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# **Sustainability Appraisal of the Hereford Area Plan Development Plan Document**

## **Housing and Employment Site Options Consultation**

Final Report  
Prepared by LUC  
August 2018

**Project Title:** Sustainability Appraisal of the Hereford Area Plan Development Plan Document – Housing and Employment Site Options Consultation

**Client:** Herefordshire Council

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# 1 Introduction

## Introduction

- 1.1 This Sustainability Appraisal Report has been prepared by LUC on behalf of Herefordshire Council as part of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the emerging Hereford Area Plan Development Plan Document (HAP DPD).
- 1.2 The aim of this SA Report is to present an appraisal of potential housing and employment sites which will assist in the subsequent preparation of the HAP DPD Preferred Options. This process will help identify reasonable alternative sites that the HAP DPD could allocate, and test them to identify their potential impacts and their relative sustainability. This SA Report focuses solely on the appraisal of site options – as opposed to the HAP DPD as a whole which will be subject to SA at a later stage. This SA Report provides an audit trail setting out how sites have been considered as part of the plan-making process. It does not appraise the strategic sites identified in policy HD1 of the Herefordshire Local Plan Core Strategy but focuses on other potential sites that are required to meet the housing targets set out in the Core Strategy.

## Geographical context for the Hereford Area Plan Development Plan Document

- 1.3 Herefordshire is a large, predominately rural, landlocked county situated in the south western corner of the West Midlands region, on the border with Wales. Herefordshire shares boundaries with five English local authorities (Worcestershire, Shropshire and Gloucestershire County Councils, and Malvern Hills and Forest of Dean District Councils) and three Welsh local authorities (Monmouthshire County Council, Powys County Council, and the Brecon Beacons National Park Authority).
- 1.4 The county area covers 217,973 hectares. High hill ranges, including the Malvern Hills and Black Mountains, encircle much of the county at its perimeter. Away from these areas, the landscape is one of gentle rolling hills, dissected by wide river valleys with lower-lying plains in the centre. River crossing points have provided a natural focus for the development of many settlements, with others dispersed across Herefordshire's rich and diverse landscape.
- 1.5 The meandering river valley landscape which is the county's principal geographical feature is that of the River Wye; which enters Herefordshire near the Welsh town of Hay-on-Wye, flowing east to Hereford before leaving the county at the Wye Gorge, downstream of Ross-on-Wye. Herefordshire contains parts of two protected landscapes of national importance: the Wye Valley and Malvern Hills Areas of Outstanding Natural Beauty (AONB).
- 1.6 At the county's heart is the city of Hereford which is the main centre for civil and ecclesiastical administration, health, education and leisure facilities, shopping and employment. The five market towns of Bromyard, Kington, Ledbury, Leominster and Ross-on-Wye surround the city. Outside these urban areas, villages and smaller settlements, farms and other isolated properties characterise much of Herefordshire.

## Hereford Area Plan Development Plan Document

### Herefordshire Local Plan Core Strategy 2011-2031

- 1.7 The [Herefordshire Local Plan Core Strategy 2011-2031](#) was adopted in October 2015 and forms part of the Local Plan for Herefordshire. The Core Strategy proposes broad strategic directions for growth in sustainable locations. The Hereford Area Plan and other DPDs and Neighbourhood

Development Plans (NDPs) will follow the Core Strategy and will allocate large, medium and small sites to meet the identified development requirements for the county. The Core Strategy together with the HAP DPD, the Minerals and Waste Local Plan, the Travellers' Sites DPD, the Rural Area Site Allocations DPD, and NDPs prepared by Town or Parish Councils, will form the statutory Development Plan for Herefordshire<sup>1</sup>.

- 1.8 The Core Strategy has a vision and 12 objectives aligned under the themes of promoting social progress (supporting strong communities by meeting housing, education and health, transport and infrastructure needs), economic prosperity (supporting new jobs, area regeneration, business, tourism and retail) and environmental quality (addressing climate change, protecting and enhancing the environmental assets of the county). The Hereford Area Plan DPD and other DPDs and NDPs must build on the principles and objectives set out in the Core Strategy regarding the development and use of land in Herefordshire.
- 1.9 The Core Strategy proposes to help deliver 16,500 homes over the 2011-31 plan period. Policy *HD1: Hereford* of the Core Strategy identifies that there is a need to allocate a minimum of 6,500 new homes within the plan period and a minimum of 15ha of new employment land. It identifies four strategic areas where half of the housing target will be met:
- 800 new dwellings in Hereford City Centre (*HD2: Hereford city centre*);
  - 500 dwellings at the Northern Urban Expansion Area (*HD4: Northern Urban Expansion [Holmer West]*);
  - 1,000 dwellings at the Western Urban Expansion Area (*HD5: Western Urban Expansion [Three Elms]*); and,
  - 1,000 dwellings at the Southern Urban Expansion Area (*HD6: Southern Urban Expansion [Lower Bullingham]*).
- 1.10 Therefore, the HAP DPD will focus on delivering the residual requirements of housing development (3,200 new dwellings) to achieve the Core Strategy targets.
- 1.11 In addition to the housing allocations, the Core Strategy provides for a supply of 148ha of employment land over the plan period. Policy *HD1: Hereford* identifies that major employment development will take place at the Western Urban Expansion area (10ha) and the Southern Urban Expansion area (5ha).

### Hereford Area Plan Development Plan Document

- 1.12 The HAP DPD will set out the detailed proposals for the delivery of sustainable growth in the historic city of Hereford including housing, employment and urban regeneration. It will include specific policies and proposals for housing; employment; town centre/retail/leisure; environmental enhancement/conservation/protection; and other significant proposals (e.g. the provision of a new university).
- 1.13 The HAP DPD is being prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012<sup>2</sup>. Regulation 18(1) consultation on the [Hereford Area Plan DPD Issues and Options Paper](#) took place between 2<sup>nd</sup> April and 22<sup>nd</sup> May 2017. High level options for the policies to be included in the HAP DPD were identified in the Issues and Options Paper alongside consultation questions in relation to housing, allotments, transport, employment, retail, tourism, and heritage/built environment.
- 1.14 A key policy area that the HAP DPD needs to address is the delivery of new housing. Supplementary to the strategic allocations already identified in the Core Strategy, it is the task of the HAP DPD to identify further deliverable site allocations to aid the delivery of Hereford's housing target to 2031. The HAP DPD will also identify non-strategic employment sites. Alongside consulting on the Issues and Options Paper on the different policy topic areas, the Council issued a "Call for Sites" in order to identify potential housing and employment allocations in the HAP DPD which ran in parallel with the seven week public consultation on the Issues and Options Paper.

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<sup>1</sup> In addition, a separate Bromyard DPD may be prepared, however it is also possible that the parish of Bromyard and Winslow may be covered within the Rural Area Site Allocations DPD.

<sup>2</sup> The Town and Country Planning (Local Planning) (England) Regulations 2012 (S.I. 2012/767)

- 1.15 Herefordshire Council is currently considering the responses received in relation to the Issues and Options Paper and gathering further evidence to help inform the preparation of the next iteration of the HAP DPD (Regulation 18[2]).
- 1.16 A SA Scoping Report of the HAP DPD (and the Rural Area Site Allocations DPD) was published in November 2016 for a five week consultation period with the statutory consultees. In April 2017, a [Sustainability Appraisal Report](#) was published for consultation alongside the Issues and Options Paper. The SA will form a key role in shaping the policies and site selection in the HAP DPD. It will also form a key part of the evidence base.

## Sustainability Appraisal and Strategic Environmental Assessment

- 1.17 Sustainability Appraisal is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.
- 1.18 Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the SEA Directive<sup>3</sup>, transposed in the UK by the SEA Regulations (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA)<sup>4</sup>. The purpose of SEA, as defined in Article 1 of the SEA Directive is *'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development'*.
- 1.19 SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the [National Planning Practice Guidance](#)), whereby users can comply with the requirements of the SEA Directive through a single integrated SA process – this is the process that is being undertaken in Herefordshire. From here on, the term 'SA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Regulations'.

## Habitats Regulations Assessment

- 1.20 Under Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) land-use plans, including Development Plan Documents, are also subject to Habitats Regulations Assessment (HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European site and to ascertain whether it would adversely affect the integrity of that site.
- 1.21 A HRA Scoping Report was prepared and sent to Natural England for consultation in April 2017. The purpose of the HRA is to identify possible impact pathways that result from HAP DPD policies or site allocations that could lead to negative likely significant effects (LSEs) on the integrity of European sites (see **Table 1.1**).

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<sup>3</sup> SEA Directive 2001/42/EC

<sup>4</sup> Under EU Directives 85/337/EEC and 97/11/EC concerning EIA.

**Table 1.1 European sites that may be affected by the Hereford Area Plan DPD**

Special Areas of Conservation (SACs)	Special Protection Areas (SPAs)	Ramsar Sites
<b>Sites inside Herefordshire boundary</b>		
River Clun		
River Wye		
Wye Valley Woodlands/ Coetiroedd Dyffryn Gwy		
<b>Sites within 15km of the boundary</b>		
Wye Valley and Forest of Dean Bat Sites / Safleoedd Ystlumod Dyffryn Gwy a Fforest y Ddena	Walmore Common	Walmore Common
Severn Estuary/ Mǎ´r Hafren	Severn Estuary	Severn Estuary
River Usk/ Afon Wysg		
Usk Bat Sites/ Safleoedd Ystlumod Wysg		
Llangorse Lake/ Llyn Syfaddan		

- 1.22 The HRA for the HAP DPD will be undertaken separately to the SA and will need to consider the potential for adverse effects on the integrity of European sites both alone and in combination with development proposed in neighbouring authorities' plans. The findings will be taken into account in the SA where relevant (for example to inform judgements about the likely effects of potential development locations proposed in the DPD on biodiversity). A HRA of the Hereford Area Plan DPD will be undertaken once the DPD is at a more advanced stage in the plan-making process.

## Structure of this SA Report

- 1.23 **Table 1.2** signposts, where relevant, how the requirements of the SEA Regulations have been met within this report.

**Table 1.2 Meeting the Requirements of the SEA Regulations**

SEA Directive Requirements	Covered in this SA Report
<b>Preparation of an environmental report</b> in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 3 and Appendix 1.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Chapter 3.
c) The environmental characteristics of areas likely to be significantly affected;	Chapter 3.
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	Chapter 3.
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	Chapter 3 and Appendix 1.

SEA Directive Requirements	Covered in this SA Report
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapters 4 and 5 and Appendices 4 and 5.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapters 4 and 5 and Appendices 4 and 5.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 4 and 5 and Appendix 6. Chapter 2 for difficulties encountered.
i) a description of measures envisaged concerning monitoring in accordance with Art. 10;	To be prepared at a later stage in the plan process.
j) a non-technical summary of the information provided under the above headings	To be prepared at a later stage in the plan process.
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2)	Addressed throughout this SA Report.
<p><b>Consultation:</b></p> <ul style="list-style-type: none"> <li>authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4)</li> </ul>	<p>Consultation on the SA Scoping Report was undertaken between November and December 2016. Consultation responses received were addressed in the Issues and Options SA Report.</p> <p>Consultation on the Issues and Options SA Report was undertaken for 8 weeks between May 2017 and June 2017. Consultation responses received are addressed in this SA Report (see Appendix 7).</p>
<ul style="list-style-type: none"> <li>authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</li> </ul>	Consultation is being undertaken in relation to the SA of the HAP DPD Housing and Employment Site Options Consultation document for 7 weeks from 20 <sup>th</sup> August 2018 to 8 <sup>th</sup> October 2018. The current consultation document is accompanied by this SA Report.
<ul style="list-style-type: none"> <li>other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).</li> </ul>	N/A
<p><b>Provision of information on the decision:</b></p> <p>When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> <li>the plan or programme as adopted</li> <li>a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>the measures decided concerning monitoring (Art. 9)</li> </ul>	To be addressed after the HAP DPD is adopted.
<p><b>Monitoring</b> of the significant environmental effects of the plan's or programme's implementation (Art. 10)</p>	To be addressed after the HAP DPD is adopted.

1.24 This chapter has described the background to the production of the HAP DPD, and the requirement to undertake SA and other assessment processes. The remainder of this report is structured into the following sections:

- **Chapter 2: Methodology** describes the approach that is being taken to the SA of the HAP DPD.
- **Chapter 3: Sustainability Context for Development in Herefordshire** describes the relationship between the HAP DPD and other relevant plans, programmes and environmental protection objectives; summarises the social, economic and environmental characteristics of Herefordshire and identifies the key sustainability issues.
- **Chapter 4: Sustainability Appraisal Findings of the Residential Site Options** summarises the SA findings of the residential site options proposed for inclusion in the HAP DPD.
- **Chapter 5: Sustainability Appraisal Findings of the Employment Site Options** summarises the SA findings of the employment site options proposed for inclusion in the HAP DPD.
- **Chapter 6: Conclusion** summarises the key findings from the SA and describes the next steps to be undertaken in the plan making process.

1.25 The appendices to the SA Report are structured as follows:

- **Appendix 1** sets out the review of relevant plans, programmes and environmental protection objectives.
- **Appendix 2** presents maps of the baseline information.
- **Appendix 3** presents the assumptions that were applied during the appraisal of residential and employment site options.
- **Appendix 4** presents the detailed SA matrices of the residential site options (summarised in Chapter 4 of the main SA Report).
- **Appendix 5** presents the detailed SA matrices of the employment site options (summarised in Chapter 5 of the main SA Report).
- **Appendix 6** details the background to identification of residential and employment site options and the reasons for selecting/discounting site options.
- **Appendix 7** presents the consultation comments received in relation to the SA Scoping Report and the Issues and Options SA Report and describes how these comments were addressed in this SA Report.

## 2 Methodology

### Introduction

- 2.1 The methodology set out in this chapter describes the approach that has been taken to the SA of the HAP DPD to date. In addition to complying with legal requirements, the approach being taken to the SA of the HAP DPD is based on current best practice and the guidance on SA/SEA set out in the National Planning Practice Guidance, which involves carrying out SA as an integral part of the plan-making process.
- 2.2 **Table 2.1** sets out the main stages of the plan-making process and shows how these correspond to the SA process.

**Table 2.1 Corresponding stages in plan making and SA**

<b>Step 1: Evidence Gathering and Engagement</b>
<b>SA stages and tasks</b>
<b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b>
1: Identifying other relevant policies, plans and programmes, and sustainability objectives
2: Collecting baseline information
3: Identifying sustainability issues and problems
4: Developing the SA Framework
5: Consulting on the scope of the SA
<b>Step 2: Production</b>
<b>SA stages and tasks</b>
<b>Stage B: Developing and refining options and assessing effects</b>
1: Testing the DPD objectives against the SA Framework
2: Developing the DPD options
3: Evaluating the effects of the DPD
4: Considering ways of mitigating adverse effects and maximising beneficial effects
5: Proposing measures to monitor the significant effects of implementing the DPD
<b>Stage C: Preparing the Sustainability Appraisal Report</b>
1: Preparing the SA Report
<b>Stage D: Seek representations on the DPD and the Sustainability Appraisal Report</b>
1: Public participation on DPD and the SA Report
2(i): Appraising significant changes
<b>Step 3: Examination</b>
<b>SA stages and tasks</b>
2(ii): Appraising significant changes resulting from representations
<b>Step 4 &amp; 5: Adoption and Monitoring</b>
<b>SA stages and tasks</b>
3: Making decisions and providing information
<b>Stage E: Monitoring the significant effects of implementing the DPD</b>
1: Finalising aims and methods for monitoring
2: Responding to adverse effects

## SA Stage A: Scoping

- 2.3 The SA process began in November 2016 with the production of a Scoping Report for the HAP DPD and the Rural Area Site Allocations DPD. It should be noted that the Scoping Report focused on the SA of both the HAP DPD and the Rural Area Site Allocations DPD due mainly to their timelines for preparation running in parallel but also as they both relate to residential and employment development within the county.
- 2.4 The scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues. The Scoping Report presented the outputs of the following tasks:
- Plans, programmes and environmental protection objectives of relevance to the DPDs were identified and the relationships between them were considered, enabling any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed.
  - Baseline information was collected on environmental, social and economic issues. This baseline information provides the basis for predicting and monitoring the likely effects of the DPDs and helps to identify alternative ways of dealing with any adverse effects identified.
  - Key sustainability issues for the county were identified.
  - A Sustainability Appraisal Framework was presented, comprising the SA objectives against which options and, subsequently, sites and policies would be appraised.
- 2.5 The SA Framework provides a way in which the sustainability impacts of implementing a particular plan can be described, analysed and compared. It sets out a series of sustainability objectives and associated questions that can be used to 'interrogate' options and policies drafted during the plan-making process. These SA objectives define the long-term aspirations of the county with regard to social, economic and environmental considerations. The SA objectives are based on those already developed for the Herefordshire Local Plan – Core Strategy, however, they have been reorganised and amalgamated to reduce duplicity (previously 23 objectives for the Herefordshire Local Plan – Core Strategy). During the SA, the performances of the HAP DPD options are assessed against these SA objectives and appraisal questions. The SA objectives are grouped into six themes to enable related sustainability issues to be considered together during the appraisal (see **Table 2.2**). The six themes are as follows:
1. Education and employment.
  2. Healthy and prosperous communities.
  3. Transport and access.
  4. Built environment.
  5. Resource consumption and climate change.
  6. Natural environment.
- 2.6 Public and stakeholder participation is an important element of the SA and wider plan-making processes. It helps to ensure that the SA Report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development. The SA Scoping Report for the DPDs was published in November 2016 for a five week consultation period with the statutory consultees (Natural England, the Environment Agency and English Heritage [now Historic England]). The HAP Issues and Options Paper was published for consultation from 2<sup>nd</sup> April to 22<sup>nd</sup> May 2017.
- 2.7 **Appendix 7** lists the comments that were received during the scoping and issues and options consultation and describes how these were assessed in the SA Report. The wording of some of the objectives has been revised since the Scoping Report to take into account the suggestions of the statutory consultees. The content of SA objective 21: *Minimise pollution* in the Scoping Report sought to minimise pollution of water, groundwater, air, soil, noise and light. However, this objective was deemed to cover too many issues and has been divided into three separate objectives to ensure each issue is thoroughly appraised in the SA (SA objective 20: *Value, protect and enhance the quality of watercourses and maximise the efficient use of water*; SA objective

22: *Minimise noise, light and air pollution*; and, SA objective 23: *Value, protect and enhance soil quality and resources*). Following consultation on the HAP DPD Issues and Options Paper, Historic England advised that SA objective 14: *Value, protect and enhance the character and built quality of settlements and neighbourhoods and the county's historic environment and cultural heritage* should be split into two separate objectives with one relating solely to the historic environment and cultural heritage (now SA objective 14: *Value, protect and enhance the county's historic environment and cultural heritage*) and the other relating to the built environment (now SA objective 15: *Value, protect and enhance the character and built quality of settlements and neighbourhoods*).

**Table 2.2 SA Framework for the Hereford Area Plan DPD**

SA Objective	Appraisal Question	SEA Topic covered by objective
<b>Education and Employment</b>		
1. Support, maintain or enhance the provision of high quality, local or easily accessible employment opportunities, suited to the changing needs of the local workforce.	1.1 Maintain or increase current employment rates in knowledge and technology intensive sectors.	Material assets <sup>5</sup>
	1.2 Provide flexible employment land near to the workforce or provide opportunities easily accessible by public transport.	
	1.3 Encourage fair and decent work conditions and increase median weekly earnings.	
	1.4 Help to increase diversity of job opportunities.	
2. Maintain or enhance conditions that enable a sustainable economy and continued investment.	2.1 Improve the resilience and/or diversity of business and the economy.	Material assets, population
	2.2 Provide or facilitate availability of appropriate sites and properties for new business opportunities or growth whilst using natural resources efficiently.	
	2.3 Encourage and support a culture of enterprise, innovation and lifelong learning, including social enterprise or the voluntary sector.	
	2.4 Promote and support the development of new high value and low impact technologies, especially resource-efficient technologies and environmental technology initiatives.	
	2.5 Support lifelong learning and training to attract and retain a highly skilled workforce.	
3. Sustainable regeneration	3.1 Help create an appropriate range of independent, competitive and national retailers.	Material assets
	3.2 Help reduce the number of vacant properties and support vitality.	
4. Raise educational achievements throughout the county	4.1 Ensure that education infrastructure meets projected future demand and need.	Material assets, population
<b>Healthy and Prosperous Communities</b>		
5. Improve the health of the people of Herefordshire, reduce disparities in health geographically and demographically, and encourage healthy living for all.	5.1 Help to ensure there is adequate provision of healthcare services appropriate to local needs, which are accessible by sustainable modes of transport.	Population, human health
	5.2 Help to reduce inequalities in health.	
	5.3 Provide opportunities to improve health and amenity through delivery of green infrastructure, enhanced public rights of way and improved access to recreation as part of developments.	
	5.4 Avoid or minimise adverse effects on the quality and	

<sup>5</sup> 'Material assets' is listed as one of the topics to be considered in the SEA, but there is no clear definition of what this topic should cover in the SEA Directive or Regulations, and it has been variously defined in different SEA reports as relating to natural resources, e.g. minerals, or built infrastructure, e.g. transport infrastructure. For the purposes of this SEA, the material assets topic is assumed to include resources such as water, minerals and waste, as well as built infrastructure, including transport and waste infrastructure, but also economic and employment infrastructure and interests.

SA Objective	Appraisal Question	SEA Topic covered by objective
	extent of existing recreational assets.	
6. Improve public realm.	6.1 Support or create high quality public realm and community/amenity space that is safe and encourages positive community interaction.	Material assets, population
7. Reduce and prevent crime/fear of crime and anti-social behaviour in the county.	7.1 Enhance community safety and security through design measures, and reduce crime or fear of crime and anti-social behaviour. 7.2 Help improve quality of life and address the opportunity for crime or anti-social behaviour through design measures. 7.3 Encourage respect for people and the environment.	Population
8. Reduce poverty and, promote equality and social inclusion by closing the gap between the most deprived areas in the county and the rest of the county.	8.1 Ensure easy and equitable access to and provision of services and opportunities, including jobs and learning, and avoid negative impacts on different groups of people because of their ethnicity, gender, religion, disability, sexuality or age. 8.2 Enable the involvement of all affected parties, including hard-to-reach groups. 8.3 Promote equality, fairness and respect for people and the environment. 8.4 Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantages.	Population, human health
<b>Transport and Access</b>		
9. Reduce road traffic and congestion, pollution and accidents and improve health through physical activity by increasing the proportion of journeys made by public transport, cycling and walking.	9.1 Reduce the need to travel. 9.2 Promote more sustainable transport patterns in areas suffering from congestion. 9.3 Improve the quality and/or provision of integrated transport options in areas of need and that are accessible to all. 9.4 Increase the use of public transport, cycling and walking. 9.5 Secure the implementation of green travel plans. 9.6 Minimise risks associated with car travel. 9.7 Promote a shift of freight from road to rail.	Material assets
10. Improve equality of access to and engagement in quality cultural, educational, leisure, sporting, recreational and community activities for all.	10.1 Maintain or increase the type or quality of facilities (including open space) in areas where there is need, ensuring easy and equitable access by sustainable modes of transport. 10.2 Promote Herefordshire's facilities to local people and tourists encouraging appreciation of the heritage of the county and participation by all. 10.3 Promote the use of inland waterways for leisure, recreation, telecommunication, freight transport and/or as a catalyst for urban and rural regeneration.	Material assets, population
11. Improve access to services and facilities.	11.1 Support viability or develop services and facilities appropriate to the community, function, character and scale of the centre and existing facilities using sustainable, resource-efficient designs.	Material assets, population
<b>Built Environment</b>		
12. Provide everyone with the opportunity to live in good quality, affordable housing of the right type and tenure, in clear, safe and pleasant local environments.	12.1 Increase access to good quality housing to meet people's needs (e.g. tenure, aspirations, location, affordability, size and type, accessible to disabled people). 12.2 Increase the supply of affordable housing. 12.3 Reduce the percentage of unfit homes/empty homes. 12.4 Improve the energy and resource efficiency of homes and reduce fuel poverty and ill-health. 12.5 Increase the use of sustainable design techniques,	Population, material assets

SA Objective	Appraisal Question	SEA Topic covered by objective
	improve the quality of housing and use sustainable building materials in construction. 12.6 Improve the wider built environment and sense of place.	
13. Ensure integrated, efficient and balanced land use.	13.1 Ensure new developments are in appropriate locations, optimising the use of previously developed land and buildings, primarily focussed on the urban areas which are accessible by walking, cycling or sustainable transport and/or will increase the share of these transport modes, thereby reducing the need to travel. 13.2 Encourage an appropriate density and mix of uses using sustainable resource-efficient design. 13.3 Promote ways of meeting local needs by encouraging local sourcing of food, goods and materials.	Soil
14. Value, protect and enhance the county's historic environment and cultural heritage.	14.1 Conserve, protect and enhance designated and undesignated heritage assets in a manner appropriate to their significance, including the Hereford Area of Archaeological Importance, Conservation Areas, Scheduled Monuments, Registered Historic Parks and Gardens Listed Buildings, archaeological remains, and areas of historical heritage and cultural value e.g. locally listed buildings.	Cultural heritage, including architectural and archaeological heritage
15. Value, protect and enhance the character and built quality of settlements and neighbourhoods.	15.1 Prevent development which is inappropriate in scale, form or design to its setting or to its function or local area. 15.2 Encourage development that creates and sustains well-designed, high quality built environments that incorporate green space and biodiversity, and promote local distinctiveness and sense of place. 15.3 Encourage cleanliness and/or improve the general appearance of the area.	Material assets, soil
<b>Resource Consumption and Climate Change</b>		
16. Reduce the amount of waste requiring disposal and minimise the use of non-reusable materials and encourage recycling.	16.1 Minimise the use of non-reusable materials. 16.2 Minimise waste from households, businesses etc. including hazardous waste. 16.3 Promote re-use, recovery and recycling of waste. 16.4 Deal with waste locally and/or through the best Practical Environmental Option.	Material assets
17. Use natural resources and energy more efficiently.	17.1 Maximise energy efficiency and minimise the consumption of non-renewable energy i.e. from fossil fuels. 17.2 Minimise the consumption of water, land, soil, minerals, aggregates and other raw materials by all e.g. through integrated transport, sustainable resource-efficient design, local sourcing of food, goods, materials, etc. 17.3 Encourage the re-use/enhancement (to high standards of sustainable resource-efficient design) of existing buildings and minimise the need for new build.	Material assets, air, water, soil
18. Reduce Herefordshire's vulnerability to the impacts of climate change as well as its contribution to the problem.	18.1 Reduce the county's contribution to climate change by reducing greenhouse gas emissions from transport, domestic, commercial and industrial sources. 18.2 Increase the proportion of energy generated from renewable and low carbon sources including by micro-generation, Combined Heat and Power (CHP), district heating, etc.	Climatic factors
<b>Natural Environment</b>		
19. Value, maintain, restore and expand county biodiversity.	19.1 Protect and enhance habitats of international, national, regional or local importance. 19.2 Protect international, national, regional or locally	Biodiversity, fauna, flora

SA Objective	Appraisal Question	SEA Topic covered by objective
	<p>important terrestrial or aquatic species.</p> <p>19.3 Maintain wildlife corridors and minimise fragmentation of ecological areas and green spaces.</p> <p>19.4 Manage access to sites in a sustainable way that protects or enhances their nature conservation value.</p> <p>19.5 Create new appropriate habitats.</p>	
20. Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces.	<p>20.1 Value, enhance and protect natural environmental assets including AONB's, open spaces, parks and gardens and their settings.</p> <p>20.2 Encourage local stewardship of local environments, for example by promoting best practices in agricultural management.</p> <p>20.3 Promote the use of rural areas and open space by all, encourage easy non-car based access, and accommodate the needs of disabled users.</p>	Landscape, fauna, flora
21. Value, protect and enhance the quality of watercourses and maximise the efficient use of water	<p>21.1 Protect and enhance the quality of watercourses.</p> <p>21.2 Maximise the efficient use of water.</p>	Water
22. Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment.	<p>22.1 Reduce flood risk both presently and taking into account climate change.</p> <p>22.2 Prevent inappropriate development of the floodplain, and include flood protection systems.</p> <p>22.3 Include sustainable drainage systems (SuDS) where appropriate.</p>	Water
23. Minimise noise, light and air pollution.	<p>23.1 Minimise air, noise and light pollution from current activities and the potential for such pollution.</p> <p>23.2 Help achieve the objectives of Air Quality Management Plans by increasing the use of public transport, cycling and walking.</p>	Air
24. Value, protect and enhance soil quality and resources.	<p>24.1 Provide opportunities to improve soil quality or reduce contaminated land.</p> <p>24.2 Avoid the loss of the best and most versatile agricultural land by prioritising the location of housing and employment developments to previously developed sites in preference to greenfield locations.</p>	Soil

## SA Stage B: Developing and Refining Options and Assessing Effects

### Introduction

2.8 Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan.

2.9 Regulation 12 (2) of the SEA Regulations requires that:

*"The (environmental or SA) report must identify, describe and evaluate the likely significant effects on the environment of—*

*(a) implementing the plan or programme; and*

*(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme*

- 2.10 Therefore, the SA must appraise not only site and policy opportunities, but “reasonable alternatives” to these. This implies that alternatives that are not reasonable do not need to be subject to appraisal. It is important to note that when considering the scope of alternatives the Regulations do not specify whether this means considering an alternative plan, programme, or strategy, or different alternatives within the plan, programme, or strategy itself that should be assessed. Part (b) of Regulation 12(2) above notes that reasonable alternatives will take into account the objectives of the plan, as well as its geographical scope. Therefore, alternatives that do not meet the objectives of national policy are unlikely to be reasonable.
- 2.11 It also needs to be recognised that the SEA and SA findings are not the only factors taken into account when determining which options to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to ‘rank’ them based on sustainability performance in order to select an option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting options for their plan.
- 2.12 Consideration will continue to be given to the issue of reasonable alternatives as the HAP DPD develops. Taking a narrative approach enables us to provide explanatory text to support the findings of the assessment, record the evidence used in reaching its conclusions and set out recommendations for mitigation and monitoring.
- 2.13 In summary, the SA should identify:
- What reasonable alternatives have been identified and on what basis;
  - How they have been assessed and compared; and,
  - What are the preferred options and why they are preferred over other alternatives.

### Hereford Area Plan DPD Issues and Options Paper

- 2.14 High level options for the policies to be included in the HAP DPD were identified in the [Hereford Area Plan DPD Issues and Options Paper](#). These were subject to SA and published for consultation in April 2017. The Issues and Options Paper posed a number of consultation questions in relation to housing, allotments, transport, employment, retail, tourism, and heritage/built environment. No sites options were proposed at this stage however, it was identified in the Issues and Options Paper that a key aim of the HAP DPD will be to set out where the remaining 3,200 dwellings<sup>6</sup> will be built and where 15ha of new employment land will be delivered over the plan period.
- 2.15 As the HAP DPD and the Rural Area Site Allocations DPD were both at the Issues and Options stage of the plan-making process, a single SA Report was prepared<sup>7</sup>. With respect to the HAP DPD, the options proposed by the Council were based on the overall vision for Hereford identified in the Core Strategy. Different approaches for addressing the issues identified were identified by the Council in relation to each of the consultation questions from the Hereford Area Plan DPD Issues and Options document. These different approaches (or options) constituted the reasonable alternatives and are outlined in **Table 2.3**. The findings of the SA of these options are summarised below the table.

**Table 2.3 Reasonable alternative options for the Hereford Area Plan DPD Issues and Options Paper**

Consultation Question	Option
<b>Housing</b>	
Do you agree that the HAP should only identify sites for a minimum of ten or more dwellings?	Option A – Only identify sites capable of accommodating 10 or more dwellings.
	Option B – Include sites that can accommodate less than 10 dwellings.
Should there be a boundary	Option A – Include a boundary.

<sup>6</sup> Policy SS2 of the Herefordshire Local Plan Core Strategy identified a need for a minimum of 6,500 new homes: 800 new dwellings in Hereford City Centre; 500 dwellings at the Northern Expansion Area; 1,000 dwellings at the Western Urban Expansion Area; and, 1,000 dwellings at the Southern Urban Expansion Area. The remaining 3,200 dwellings will be delivered by the HAP DPD.

<sup>7</sup> LUC (2017) Sustainability Appraisal of the Hereford Area Plan and the Rural Area Site Allocations Development Plan Documents.

Consultation Question	Option
drawn to show where new development can happen and where it should be limited to protect the countryside?	Option B – No boundary.
Which option should be considered when planning for Houses of Multiple Occupation (HMOs)?	Option A – To set out a criteria based policy to guide the development of HMOs, referring to the consideration of matters such as: <ul style="list-style-type: none"> <li>• The impact on the amenity of adjoining premises and on the character of the area;</li> <li>• The provision for car parking and the traffic situation;</li> <li>• The standard of accommodation, including private amenity space;</li> <li>• Intensification of existing HMOs;</li> <li>• Flexible planning conditions to allow for HMOs to be returned to a single dwelling house without planning permission;</li> <li>• Design.</li> </ul>
	Option B - To set a restrictive policy for HMOs, stating that they generally will 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).
	Option C - 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 small criteria-based policy through which to guide planning applications for this type of development, large or small.
<b>Allotments</b>	
Do you think there is a need for more allotment provision, for example as part of new housing developments or on existing open spaces?	Option A - The HAP should seek more allotment provision.
	Option B - The HAP should not seek any further allotment provision.
<b>Transport</b>	
Is there a need for more parking to be identified? If so, what form should new parking take?	Option A – Yes- more parking should be identified
	Option B – No- no more parking needs to be identified
	Option C – Yes- more parking should be identified in the form of multi-storey provision
	Option D – Yes- more parking should be identified in the form of park and choose provision
	Option E – Yes- more parking should be identified in the form of other
<b>Employment</b>	
Should the Hereford Area Plan identify more land for new employment development? If so, what type of development should be identified?	Option A – Yes- more land for employment should be identified
	Option B – No- do not identify any more land for employment
	Option C – Yes- more employment land should be identified in the form of offices
	Option D – Yes- more employment land should be identified in the form of manufacturing
	Option E – Yes- more employment land should be identified in the form of warehousing
	Option F – Yes- more employment land should be identified in the form of other
Should the Hereford Area Plan allow for a broader range of activities on existing employment sites of poorer quality? If so, what would be	Option A – Yes- the HAP should allow for other uses on poorer quality employment sites
	Option B – No- the HAP should not allow for other uses on any existing employment sites

Consultation Question	Option
considered appropriate alternative uses on existing employment sites of poorer quality?	Option C – Yes- a broader range of activities on existing employment sites of poorer quality should be identified in the form of leisure uses
	Option D – Yes- a broader range of activities on existing employment sites of poorer quality should be identified in the form of sports/recreational uses
	Option E – Yes- a broader range of activities on existing employment sites of poorer quality should be identified in the form of retail uses
	Option F – Yes- a broader range of activities on existing employment sites of poorer quality should be identified in the form of other
<b>City centre and retail</b>	
Should the Hereford Area Plan identify further land for new retail development?	Option A - The HAP should seek further retail development.
	Option B - There is no need for the HAP to identify any further retail development.
<b>Tourism</b>	
Should additional hotel and/or conference facilities be provided in Hereford?	Option A - The HAP should seek additional hotel and conference facilities.
	Option B - The HAP does not need to seek any additional hotel or conference facilities.
<b>Heritage/Built Environment</b>	
Do you think more specific and detailed policies for the historic environment and heritage assets than those in the Core Strategy are required in the Hereford Area Plan?	Option A - The HAP should include Hereford-specific policies for the historic environment and heritage assets.
	Option B - The existing policies in the Core Strategy are sufficient.

- 2.16 For the housing options relating to the size of the sites, more significant positive and negative effects were identified for Option A, particularly with respect to SA objectives **4: Education, 5: Health, 9: Sustainable Transport, 12: Housing, 14: Built Environment, 17: Climate Change, 18: Biodiversity, 19: Landscape, 21: Flooding, 22: Pollution** and **23: Soil**. For the settlement boundary options, Option A, which proposes that a settlement boundary is identified, will have positive effects for the majority of SA objectives while Option B, which proposes that a boundary is not identified, will have mostly negative effects. The options relating to Houses of Multiple Occupation (HMO) will generally have negligible effects with the exception of Option A which will have a significant positive effect on SA objective **12: Housing** as it supports a criteria-based policy to guide development of HMOs which will diversify housing tenures and ensure the provision of good quality housing in Hereford.
- 2.17 In general, minor positive or negligible effects were identified in relation to the options relating to allotments.
- 2.18 Mixed effects were identified for the transport options with some significant negative effects being identified for SA objectives **9: Sustainable Transport, 17: Climate Change** and **22: Pollution** as Options A and E support the provision of car parks which may be seen to encourage private car use by increasing the attractiveness and convenience of car travel thereby contributing to air pollution.
- 2.19 Significant positive effects were identified for the employment options relating to the amount of employment land to be allocated for SA objectives **1: Employment, 2: Sustainable Economy** and **3: Sustainable Regeneration**. Conversely, significant negative effects are also identified for these options in relation to the more environmental objectives. The options relating to the use of poor quality employment sites identified positive effects for the majority of the objectives with significant positive effects expected for SA objectives **3: Sustainable Regeneration, 13: Efficient Use of Land, 14: Built Environment, 16: Natural Resources, 18: Biodiversity, 19: Landscape** and **23: Soil**.
- 2.20 The city centre and retail options proposing to identify further land for retail development and the development of additional hotels in the City were identified as having significant positive effects

for the economic and social objectives with minor positive effects expected for the majority of the remaining objectives.

- 2.21 The heritage/built environment option proposing to include Hereford-specific policies for the historic environment was identified as having more positive effects than the option which would rely on the existing historic environment policies in the Core Strategy, particularly with respect to SA objectives **14: Built Environment** and **19: Landscape**.

### Hereford Area Plan DPD – Housing and Employment Site Consultation document SA Report

- 2.22 This SA Report presents an appraisal of potential housing and employment sites that the HAP DPD could allocate.

#### Stage 1

- 2.23 Potential sites for inclusion in the HAP DPD were identified by Herefordshire Council from a number of sources, namely:
- The Hereford Housing and Economic Land Availability Assessment (HELAA) 2015<sup>8</sup>.
  - The Hereford Area Plan – Topic Paper – Emerging potential housing options<sup>9</sup>.
  - The “Call for Sites” carried out in parallel with the HAP DPD Issues and Options Paper consultation from April to May 2017.
  - Representations on the HAP DPD Issues and Options Paper.
- 2.24 The HELAA provided a technical and theoretical assessment of sites which have the potential to contribute towards the supply of land for housing and economic development in Hereford City. The assessment identified all greenfield and brownfield sites/broad locations within and/or adjacent to Hereford City. The assessment considered sites capable of accommodating five or more dwellings or economic development on sites of 0.25ha or 500m<sup>2</sup> and above. Sites excluded from the assessment at an early stage included sites constrained by national environmental designations (i.e. Ancient Woodlands; areas entirely within Flood Risk Zone 3; Local Nature Reserves; Sites of Special Scientific Interest; Special Area of Conservation; and Registered Parks and Gardens), which would entirely preclude development. Sites were also assessed for their suitability and availability. The total number of sites originally considered as part of the HELAA was 291. A number of these were ruled out at an early stage as they were not within or adjoining the urban area of Hereford. The number of sites assessed as part of the HELAA was 126. 71 sites were found to be suitable, available and achievable.
- 2.25 A Housing Topic Paper<sup>10</sup> was published in April 2017 alongside the HAP DPD Issues and Options Paper and set out details of an initial sieving exercise of HELAA sites. As identified above, the threshold in the HELAA focused on capacities of five or more dwellings on sites of 0.25ha and above. As there were only a small amount of sites of this size identified, the Council decided to raise the threshold to capacities of 10 dwellings or more (or 0.4ha for developable land), which it considered appropriate in Hereford due to the scale and nature of the city. This also reflects the Housing White Paper<sup>11</sup> intentions for consideration of smaller sites that could be suitable for allocation. The Housing Topic Paper assessed 140 sites and identified that 31 sites offer potential for housing development, yielding a minimum of 3,545 dwellings and a maximum of 5,488 dwellings over the plan period. A total of 109 sites were not considered appropriate for further assessment (and therefore not reasonable alternatives) because:
- sites were deemed to have potential but there was a lack of information on whether sites were available as no information was forthcoming from landowners;

<sup>8</sup> URS, 2015. Herford Housing and Economic Land Availability Assessment (HELAA) Final Report [pdf]. Available at: [https://www.herefordshire.gov.uk/downloads/download/215/hereford\\_housing\\_and\\_economic\\_land\\_availability\\_asses](https://www.herefordshire.gov.uk/downloads/download/215/hereford_housing_and_economic_land_availability_asses)

<sup>9</sup> Herefordshire Council, 2017. Hereford Area Plan – Topic Paper – Emerging potential housing options [pdf]. Available at: [https://www.herefordshire.gov.uk/downloads/file/13985/hereford\\_area\\_plan\\_-\\_potential\\_housing\\_options](https://www.herefordshire.gov.uk/downloads/file/13985/hereford_area_plan_-_potential_housing_options)

<sup>10</sup> Herefordshire Council, 2017. Hereford Area Plan – Topic Paper – Emerging potential housing options [pdf]. Available at: [https://www.herefordshire.gov.uk/downloads/file/13985/hereford\\_area\\_plan\\_-\\_potential\\_housing\\_options](https://www.herefordshire.gov.uk/downloads/file/13985/hereford_area_plan_-_potential_housing_options)

<sup>11</sup> Department for Communities and Local Government, 2017. Fixing our broken housing market [pdf]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/590464/Fixing\\_our\\_broken\\_housing\\_market\\_-\\_print\\_ready\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf)

- sites were outwith the HAP Area Boundary;
- sites were deemed as unsuitable for housing, even if they were available due to technical issues or environmental constraints which suggest they should not be identified for housing development; and,
- sites had achieved planning permission.

### Stage 2

- 2.26 As a result of discussions with the HAP Officer Working Group and the HAP Reference Group which comprised officers from various departments in Herefordshire Council, it was agreed that a reassessment of sites that had been discounted previously in stage 1 where availability was unknown should be undertaken. In addition to the sources outlined in stage 1, Herefordshire Council explored a number of additional sources to facilitate the identification of site options. Several Council-owned sites that are potentially available, suitable and achievable for development have been proposed for assessment alongside a number of sites where there is local knowledge that the current occupiers are seeking to relocate.
- 2.27 Taking all of the above into account, the Council provided LUC with 57 reasonable alternative site options (57 housing sites and five employment sites) for assessment. Although sites Cen23 and Tup01 were considered to have potential for further assessment in the Housing Topic Paper, these sites were not subject to SA as they have planning permission and were not considered to be 'reasonable' alternatives. Therefore, a total of 62 housing sites and five employment sites were subject to SA.
- 2.28 **Appendix 6** outlines the audit trail of sites and details the background to identification of residential and employment sites options and the reasons for selecting/discounting site options for assessment.

## SA Stage C: Preparing the SA Report

- 2.29 This SA Report describes the process that has been undertaken to date in carrying out the SA of the Hereford Area Plan DPD. It focuses on a single element of the emerging DPD (the site options) – as opposed to the HAP DPD as a whole which will be subject to SA at a later stage. As such it is limited to providing an assessment of the likely significant effects of the principle of residential and employment development within the boundary of each site option to help inform further development of the DPD in the period leading up to Regulation 19 consultation on the Proposed Submission version.

## SA Stage D: Consultation on the Hereford Area Plan DPD and the SA Report

- 2.30 Herefordshire Council is inviting comments on the HAP DPD Housing and Employment Site Options Consultation document and this SA Report, both of which will be published on the Council's website under Regulation 18(2) of the Town and Country Planning (Local Planning) (England) Regulations (2012). The consultation period will be open from 20<sup>th</sup> August 2018 to 8<sup>th</sup> October 2018. Consultation comments on the HAP DPD and this SA Report will be taken into account in the subsequent iteration of the DPD and the SA Report.

## SA Stage E: Monitoring implementation of the Hereford Area Plan DPD

- 2.31 Recommendations for monitoring the social, environmental and economic effects of implementing the Hereford Area Plan DPD will be presented in the next iteration of the SA Report, once a Preferred Approach for the DPD has been identified.

## Appraisal Methodology

- 2.32 The site options for the HAP DPD have been appraised against the 23 SA objectives in the SA Framework (see **Table 2.2** earlier in this section), with scores being attributed to each option to indicate its likely sustainability effects on each objective, as shown in **Table 2.4**.

**Table 2.4 Key to symbols and colour coding used in the SA of the Hereford Area Plan DPD**

++	The option is likely to have a <b>significant positive</b> effect on the SEA objective(s).
++/-	The option is likely to have a mixed effect ( <b>significant positive</b> and <b>minor negative</b> ) on the SEA objective(s).
+	The option is likely to have a <b>positive</b> effect on the SEA objective(s).
0	The option is likely to have a <b>negligible</b> or no effect on the SEA objective(s).
-	The option is likely to have a <b>minor negative</b> effect on the SEA objective(s).
-/+	The option is likely to have a mixed effect ( <b>significant negative</b> and <b>minor positive</b> ) on the SEA objective(s).
--	The option is likely to have a <b>significant negative</b> effect on the SEA objective(s).
?	It is <b>uncertain</b> what effect the option will have on the SEA objective(s), due to a lack of data.
+/- or ++/--	The option is likely to have a <b>mixture of minor positive and minor negative</b> effects or a <b>mixture of significant positive and significant negative</b> effects on the SEA objective(s).

- 2.33 Where a potential positive or negative effect is uncertain, a question mark is added to the relevant score (e.g. +? or -?) and the score is colour coded as per the potential positive, negligible or negative score (e.g. green, yellow, orange, etc.).
- 2.34 The likely effects of the options needs to be determined and their significance assessed, and this inevitably requires a series of judgments to be made. This appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option on the SA objective in question is considered to be of such magnitude that it would have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.
- 2.35 The SA findings for the reasonable alternative site options in the HAP DPD are summarised in **Chapters 4** and **5**. Detailed appraisal matrices for the proposed site options are presented in **Appendices 4** and **5**.

### Assumptions applied during the SA

- 2.36 SA inevitably relies on an element of subjective judgement. However, in order to ensure consistency and transparency in the appraisal of the sites, assumptions to help guide the approach to scoring were developed and used in the appraisal. The assumptions were tailored to inform the different site allocations, and are presented in **Appendix 3**. The assumptions used for the appraisal of site options relied primarily on the use of Geographical Information Systems (GIS) data.

## Difficulties Encountered and Data Limitations

- 2.37 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process and these are outlined below.
- 2.38 The site capacities were being decided on during the assessment of sites. This involved a revision of the site assessment criteria and the matrices as site capacities were not identified for all sites. It was decided by LUC to remove the criteria which related to site capacities and only refer to site areas to ensure a consistent approach to the site assessments was undertaken. This applied to SA objectives **11: Access to Services**, **12: Housing** and **16: Waste**. Where site capacities are identified, these are referred to in the assessments for SA objective **12: Housing**.
- 2.39 Herefordshire Council prepared a Strategic Flood Risk Assessment (SFRA) in 2009 and is currently in the process of preparing a revised SFRA. Due to the passage of time since the previous SFRA was prepared, it was decided not to use this dataset to identify areas at risk of flooding but the Environment Agency Flood Zones dataset which is more up-to-date but only shows Flood Zones 2 and 3. Therefore, the sub-categories of Flood Zone 3 (3a and 3b) were not available in the assessment criteria. This resulted in a revision to the site criteria which previously referenced Flood Zones 3a and 3b.
- 2.40 The only dataset Herefordshire Council has on undesignated heritage assets relates solely to unregistered parks and gardens. Therefore, proximity to unregistered parks and gardens is the only proxy used for impacts on undesignated heritage assets during the site assessments.
- 2.41 There is no a separate dataset which identifies locally important geological sites. These sites are identified within the Sites of Importance for Nature Conservation and Special Wildlife Sites datasets.
- 2.42 Sites on the 2018 Brownfield Register are identified as points rather than polygons and therefore the extent of the brownfield is uncertain. Furthermore, datasets on contaminated land and greenfield sites are not available.

### 3 Sustainability Context for Development in Herefordshire

#### Review of Plans, Programmes and Environmental Protection Objectives

- 3.1 The Hereford Area Plan DPD is not being prepared in isolation, and is greatly influenced by other plans and programmes and by broader sustainability objectives. The HAP DPD needs to be consistent with international and national guidance and strategic planning policies, and should contribute to the goals of a wide range of other programmes and plans. It must also conform to environmental protection legislation and the sustainability objectives established at the international, national and local levels.
- 3.2 Schedule 2 of the SEA Regulations requires:
  - (1) "an outline of the...relationship with other relevant plans or programmes"; and
  - (5) "the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation"
- 3.3 During the Scoping stage of the SA, a review was undertaken of the plans, programmes and environmental protection objectives that are relevant to the HAP DPD. This review has been revised and updated in light of comments received during the Issues and Options consultation. The updated review can be seen in full in **Appendix 1** and the key findings are summarised below.

#### Key international plans, programmes and environmental protection objectives

- 3.4 At the international level, [Directive 2001/42/EC](#) on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and [Directive 92/43/EEC](#) on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the HAP DPD. These processes should be undertaken iteratively and integrated into the production of the HAP DPD in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.
- 3.5 There are a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy; however the international directives have been included in **Appendix 1** for completeness.
- 3.6 **Table 3.1** lists the international plans, programmes and environmental protection objectives which are of relevance to the HAP DPD.

**Table 3.1 Key international plans, programmes and environmental protection objectives reviewed for the SA of the HAP DPD**

INTERNATIONAL
IPCC's Fifth Assessment Report on Climate Change (IPCC, 2014)
Johannesburg Declaration on Sustainable Development (2002)
Aarhus Convention (1998)
Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)
Bonn Convention on the Conservation of Migratory Species of Wild Animals (1979)

<b>INTERNATIONAL</b>
Ramsar Convention – Convention on Wetlands of International Importance (1971)
UNESCO World Heritage Convention (1972)
Paris Agreement (2015)
<b>EU DIRECTIVES</b>
SEA Directive 2001/42/EC
The Birds Directive 2009/147/EC
The Habitats Directive 92/43/EEC
The Water Framework Directive 2000/60/EC
The Floods Directive 2007/60/EC
The Drinking Water Directive 98/83/EC
The Bathing Water Quality Directive 2006/7/EC
The Urban Waste Water Directive 91/271/EEC
The Nitrates Directive 91/676/EEC *
The Waste Framework Directive 2008/98/EC
The Landfill Directive 99/31/EC
The Packaging and Packaging Waste Directive 94/62/EC
EU Management of Waste from Extractive Industries (2006/21/EC)
The Air Quality Directive 2008/50/EC (amended by Directive 2015/1480/EC)
The Industrial Emissions Directive 2010/75/EU
The Noise Directive 2000/14/EC
<b>EUROPEAN</b>
EU Seventh Environmental Action Plan to 2020
EU Biodiversity Strategy to 2020
European Spatial Development Perspective (1999)
European Landscape Convention (Florence, 2002)
European Convention on the Protection of the Archaeological Heritage (Valletta, 1992)
The Convention for the Protection of the Architectural Heritage of Europe (Granada, 1985)

### **Key national plans, programmes and environmental protection objectives**

- 3.7 The most significant development in terms of the policy context for the HAP DPD has been the publication of the revised [National Planning Policy Framework](#) (NPPF) (2018). The Local Plan must be consistent with the requirements of the NPPF. The NPPF sets out information about the purposes of local plan-making, stating that plans should:
- a) *"be prepared with the objective of contributing to the achievement of sustainable development;*
  - b) *be prepared positively, in a way that is aspirational but deliverable;*
  - c) *be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
  - d) *contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
  - e) *be accessible through the use of digital tools to assist public involvement and policy presentation; and*
  - f) *serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant".*

- 3.8 The NPPF requires local planning authorities to set out the strategic priorities for the development and use of land in its area. This should include strategic policies for:
- a) *"housing (including affordable housing), employment, retail, leisure and other commercial development;*
  - b) *infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
  - c) *community facilities (such as health, education and cultural infrastructure); and*
  - d) *conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation".*
- 3.9 Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Broad locations for development should be indicated on a key diagram, and land-use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.
- 3.10 Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.
- 3.11 The NPPF is supported by [Planning Practice Guidance](#) which includes guidance on various topics such as air quality, flood risk and coastal change, the natural environment, and waste.
- 3.12 **Table 3.2** lists the national plans, programmes and environmental protection objectives which are of relevance to the HAP DPD.

**Table 3.2 Key national plans, programmes and environmental protection objectives reviewed for the SA of the HAP DPD**

NATIONAL
Ministry of Housing, Communities and Local Government (2018) National Planning Policy Framework
Planning Practice Guidance:
DCLG (2014) Planning Practice Guidance on air quality
DCLG (2014) Planning Practice Guidance on climate change
DCLG (2014) Planning Practice Guidance on conserving and enhancing the historic environment
DCLG (2014) Planning Practice Guidance on ensuring the vitality of town centres
DCLG (2014) Planning Practice Guidance on flood risk and coastal change
DCLG (2017) Planning Practice Guidance on health and wellbeing
DCLG (2018) Planning Practice Guidance on local plans
DCLG (2014) Planning Practice Guidance on minerals
DCLG (2016) Planning Practice Guidance on the natural environment
DCLG (2014) Planning Practice Guidance on noise
DCLG (2014) Planning Practice Guidance on light pollution
DCLG (2014) Planning Practice Guidance on open space, sports and recreation facilities, public rights of way and local green space
DCLG (2016) Planning Practice Guidance on rural housing
DCLG (2015) Planning Practice Guidance on renewable and low carbon energy
DCLG (2015) Planning Practice Guidance on waste

<b>NATIONAL</b>
DCLG (2015) Planning Practice Guidance on water supply, wastewater and water quality
DCLG (2015) Planning Policy for Traveller Sites
DCLG (2014) National Planning Policy for Waste
DEFRA (2013) National Waste Management Plan for England
HM Government (2013) Waste prevention programme for England: Prevention is better than cure – The role of waste prevention in moving to a more resource efficient economy
DEFRA (2012) National Policy Statement for Waste Water
DEFRA (2013) National Policy Statement for Hazardous Waste
HM Government (2009) The UK Low Carbon Transition Plan
HM Government (2011) The Carbon Plan: Delivering our low carbon future
HM Government (2017) The UK Climate Change Risk Assessment
DECC (2009) The UK Renewable Energy Strategy
HM Government (2017) The Clean Growth Strategy
DECC (2014) Community Energy Strategy
DECC (2012) The Energy Efficiency Opportunity in the UK
DEFRA (2013) The National Adaptation Programme – Making the Country Resilient to a Changing Climate
HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment
Environment Agency (2011) The National Flood and Coastal Erosion Risk Management Strategy for England
DEFRA (GP3) Underground, Under threat – Groundwater Protection: Policy and Practice
DEFRA (2008) Future Water: The Government’s Water Strategy for England
Environment Agency (2009) Water for People and the Environment: Water Resources Strategy for England and Wales
DEFRA (2009) Safeguarding our Soils: A Strategy for England
DEFRA (2018) Draft Clean Air Strategy 2018
DEFRA and DfT (2017) Improving air quality in the UK: tackling nitrogen dioxide in our towns and cities: Draft UK Air Quality Plan for tackling nitrogen dioxide
DEFRA (2017) UK plan for tackling roadside nitrogen dioxide concentrations
DEFRA (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland
DEFRA (2011) Biodiversity 2020: A strategy for England’s wildlife and ecosystem services
DEFRA (2011) Securing the Future: Delivering UK Sustainable Development Strategy
DCLG (2011) Laying the Foundations: A Housing Strategy for England
HM Treasury (2015) Fixing the Foundations – Creating a more prosperous nation
DfT (2013) Door to Door: A Strategy for Improving Sustainable Transport Integration
DoH (2010) Healthy Lives, Healthy People: Our Strategy for public health in England
HM Government (2015) Sporting Future: A New Strategy for an Active Nation
Sport England (2016) Towards an Active Nation – Strategy 2016-2021
DfT (2016) Cycling and Walking Investment Strategy
Natural England (2003, 2010) Accessible Natural Green Space Standards in Towns and Cities: A Review and Toolkit for their Implementation, and Nature Nearby: Accessible Green Space Guidance
<b>WHITE AND GREEN PAPERS</b>
DCLG (2017) Housing White Paper - Fixing our broken housing market *
DCLG (2017) Part of the Housing White Paper - Fixing our broken housing market - Planning for the right homes in the right places: consultation proposals
HM Government (2017) Industrial Strategy: Building a Britain fit for the future (White Paper)
DEFRA (2011) Natural Environment White Paper - The Natural Choice: Securing the value of nature

<b>NATIONAL</b>
DEFRA (2011) Electricity Market Reform White Paper - Planning our Electric Future: A White Paper for Secure, Affordable and Low-Carbon Electricity
DEFRA (2011) Water White Paper - Water for Life
DfT (2004) Transport White Paper - The Future of Transport White Paper 2004: A network for 2030
DCLG (2000) Urban White Paper - Our Towns and Cities: The Future – delivering an urban renaissance
<b>NATIONAL LEGISLATION</b>
Localism Act 2011
Housing Act 2004
Flood and Water Management Act 2010
Climate Change Act 2008
The Countryside and Rights of Way Act 2000
Planning (Listed Buildings and Conservation Areas Act 1990)
Ancient Monuments and Archaeological Areas Act 1979
The Natural Environment and Rural Communities Act 2006
<b>REGULATIONS</b>
The Conservation of Habitats and Species Regulations (2010) (as amended)

### Key local plans, programmes and environmental protection objectives

- 3.13 At the sub-regional and local levels there are a wide range of plans and programmes that are specific to Herefordshire which provide further context for the HAP DPD. These plans and programmes relate to issues such as the economy, transport, climate change and green infrastructure. Some of the key documents are discussed below. A full list can be found in **Appendix 1**.

#### *Herefordshire Local Plan - Core Strategy*

- 3.14 The Hereford Area Plan and Rural Area Site Allocations DPDs will sit alongside the adopted [Herefordshire Local Plan - Core Strategy](#) (adopted 2015) as part of the statutory Development Plan for Herefordshire. The Core Strategy provides the strategic planning framework for the county's future development needs up to 2031. The Core Strategy requires a minimum of 16,500 homes between 2011 and 2031, with at least 6,500 new homes in Hereford and 5,300 homes in rural areas. Neighbourhood Plans should allocate land for the relevant housing need in their area and those areas without Neighbourhood Plans will have land allocated through the Rural Area Site Allocations DPD. The Core Strategy sets a target of 148ha of new employment land over the plan period with 15ha of new employment land to be delivered in Hereford.

#### *Herefordshire Local Transport Plan 4 (LTP4) 2016-2031*

- 3.15 The [Herefordshire Local Transport Plan 4](#) was adopted in May 2016 and covers the period 2016-2031. It sets out the Council's strategy for supporting economic growth, improving health and wellbeing and reducing environmental impacts of transport. Objectives of the plan include ensuring transport infrastructure enables economic growth and reducing single occupant, short-distance car journeys.
- 3.16 The Hereford Transport Package will incorporate a number of schemes contained in the Local Transport Plan, 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. As part of the Hereford Transport Package, the City Link Road was opened in December 2017 in Hereford which links Commercial Road and Edgar Street. Future transport and infrastructure improvements identified in the Hereford Transport Package include:
- the Southern Link Road in the South Wye area which will reduce congestion on Belmont Road and provide improved access to the Enterprise Zone at Rotherwas; and,

- the Hereford Bypass which will provide an alternative route for through traffic.

*Waste Management Strategy for Herefordshire and Worcestershire 2004-2034*

- 3.17 The aim of the joint [Waste Management Strategy for Herefordshire and Worcestershire 2004-2034](#) (2011) is to decrease waste production and increase the recovery of value from waste, by treating it as a resource. The strategy is guided by a number of principles, including commitment to the waste hierarchy and waste prevention, minimising the use of landfill and consideration of social, environmental and economic impacts.

*Invest Herefordshire – Herefordshire’s Economic Vision (2017)*

- 3.18 [Invest Herefordshire – Herefordshire’s Economic Vision](#) identifies a series of private sector investment opportunities that will contribute to the growth of the county. It also sets out what the public sector will provide in terms of creating the conditions to encourage economic growth. The economic vision has four key roles: (1) to support the growth of the Herefordshire economy by identifying priority projects; (2) to attract investment to Herefordshire and guide it within the county; (3) to raise the profile of Herefordshire and the investment opportunities; and (4) to provide Herefordshire with clear priorities for negotiations.

*Herefordshire Local Flood Risk Management Strategy (2017)*

- 3.19 The [Herefordshire Local Flood Risk Management Strategy](#) (2017) sets out the framework for how the Council will work with other local flood risk management authorities and the general public to better understand and manage existing and future flood risks from all potential sources of flooding.

*Wye Valley AONB Management Plan 2015-2020*

- 3.20 The [Wye Valley AONB Management Plan 2015-2020](#) (2016) is intended to provide guidance and strategic objectives to support and steer positive landscape change. Aims include conservation and enhancement of landscape, biodiversity and heritage assets as well as guiding sustainable land management and development.

*Malvern Hills AONB Management Plan 2014-2019*

- 3.21 The purpose of the [Malvern Hills AONB Management Plan 2014-2019](#) (2014) is to help all those involved in managing the AONB to conserve its special qualities, manage pressures on these qualities and improve the AONB for current and future generations of people who live in and visit the area. Aims include conservation, enhancement and wise use of biodiversity, geodiversity, landscape and resources within the AONB. Aims also include supporting tourism and reducing the impact of car traffic in the AONB.

*Brecon Beacons National Park Management Plan 2015-2020*

- 3.22 The [Brecon Beacons National Park Management Plan 2015-2020](#) (2016) establishes six management themes to: (1) manage park landscapes to maximise conservation and public benefits; (2) conserve and enhance biodiversity; (3) provide opportunities for outdoor access and recreation; (4) raise awareness and understanding of the Park; (5) build and maintain sustainable communities, towns and villages; and (6) support sustainable economic development.

*River Wye SAC Nutrient Management Plan (2014)*

- 3.23 The 2010 HRA for the Herefordshire Local Plan - Core Strategy identified likely significant effects on water quality as a result of the plan at that stage. In light of this result, Herefordshire Council established a Water Steering Group comprising officers from the Council, Natural England, the Environment Agency and Dwr Cymru Welsh Water.
- 3.24 The key outcome of the Water Steering Group discussions has been extensive joint working on the production of a [River Wye SAC Nutrient Management Plan](#) (NMP). The NMP sets out measures which could be implemented in order to ensure the favourable conservation status of the SAC in respect of phosphate levels as soon as possible and at the latest by 2027 taking into account the existing river phosphate levels and existing water discharge permits. The NMP also seeks to identify actions that would enable additional development (beyond existing consents) to proceed during the period 2013 to 2031 of the type and amount, and in the locations specified in or pursuant to the emerging Herefordshire Core Strategy and other relevant development plans.

3.25 The NMP comprises three parts: Evidence Base, Options Appraisal and Action Plan. The Environment Agency commissioned consultants to carry out the first two parts. The [Evidence Base](#) has been produced using source apportionment modelling software to identify the phosphate contributions from the different sources within the catchment. The evidence base also contains the predicted impact of growth in Powys and Herefordshire on the SAC. The Options Appraisal section explores some of the measures available to reduce the phosphate loads. The [Action Plan](#) was published in November 2014 and aims to be a 'living document' in that it will undergo regular review and be adapted through time to take account of new evidence. Actions include reviewing the discharge permitting process and community engagement. The first review of the Action Plan is anticipated to be completed later in 2017. An NMP Board has been established comprising a range of partner organisations with the aim of identifying and delivering the actions that achieve the phosphorous conservation target of the River Wye SAC.

#### *The Urban Panel Review Paper*

3.26 In October 2017, Historic England published a [Urban Panel Review Paper](#) of Hereford City. The document provides an evaluation of the city centre area and how the proposed university could integrate within the city.

#### *A Conservation Management Plan for Hereford's City Defences*

3.27 [A Conservation Management Plan for Hereford's City Defences](#) (2011) was developed in response to the declining condition of parts of Hereford's city defences which had been placed on Historic England's Heritage at Risk Register.

3.28 The underlying aim is to better preserve heritage assets whilst simultaneously improving their exploitation as an asset in heritage-led regeneration for Hereford City, adding materially to the historic character of the city as a whole.

3.29 Strategic priorities are set out within the Conservation Management Plan for the period 2012-2026, intended to facilitate the implementation of the strategic policies in the Local Development Framework. These are as follows:

- planning and strategic development - enhancement of the visibility/interpretation of the city's defences in all localities;
- tourism and economic development;
- case-led or area-led development; and,
- research and documentation.

#### *Neighbourhood Development Plans*

3.30 Within the Hereford Area Plan boundary there are a number of Neighbourhood Development Plans (NDPs) adopted or in preparation:

- Lower Bullingham neighbourhood plan area includes much of the Hereford Enterprise Zone, which also falls within the HAP boundary. The Lower Bullingham NDP was adopted in May 2017.
- Belmont Rural neighbourhood plan area falls entirely within the HAP area. The Belmont Rural NDP was adopted in October 2017.
- Dinedor Parish Council submitted their draft NDP to Herefordshire Council on 31 October 2017. As with Lower Bullingham, part of the area includes a section of the Hereford Enterprise Zone.
- Holmer and Shelwick Parish Council published an informal Consultation Draft of the Holmer and Shelwick NDP in April 2018.

3.31 It will be important to ensure that the HAP policies and proposals are consistent with the policies in the NDPs. Where there are emerging NDPs that fall within the HAP 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.

3.32 In addition, all other parishes which adjoin the HAP boundary have either prepared a NDP or are in the process of preparing one.

### *Neighbouring Local Plans*

- 3.1 Throughout the preparation of the HAP DPD and the SA process, consideration will be given to the Local Plans being prepared by the authorities around Herefordshire. The development proposed in those authorities could give rise to in-combination effects with the effects of the HAP DPD, and the effects of the various plans may travel across local authority boundaries.

### *Shropshire Local Development Framework: Adopted Core Strategy 2006-2026*

- 3.2 Shropshire lies to the north of Herefordshire. The [Adopted Core Strategy 2006-2026](#) (2011) sets out Shropshire Council's vision, strategic objectives and the broad spatial strategy to guide future development and growth in Shropshire, until 2026. It aims to deliver more sustainable places at all levels and in both urban and rural settings. It places particular importance on ensuring that Shropshire's market towns and rural settlements become more sustainable and resilient. The Core Strategy aims to deliver 27,500 new homes in the plan period and around 290ha employment land. Shropshire also has a [Site Allocations and Management of Development Plan](#), adopted in 2015, which identifies specific sites for delivering development.

### *Powys Local Development Plan 2011-2026*

- 3.3 Powys lies to the west of Herefordshire. The [Powys Local Development Plan 2011-2026](#) (adopted April 2018) sets out Powys County Council's policies for development and land use in Powys, excluding the Brecon Beacons National Park, up to 2026. The LDP provides land to meet the housing requirement of 2,500 dwellings, including 949 affordable homes, over the plan period. The LDP also provides for 45ha employment land and includes policies to meet the needs of the local economy. The LDP also aims to support the character, distinctiveness and heritage of Powys.

### *Monmouthshire Local Development Plan 2011-2021*

- 3.4 Monmouthshire lies to the southwest of Herefordshire. The vision of the [Monmouthshire Local Development Plan 2011-2021](#) (adopted 2014) is to make Monmouthshire a place where people live in inclusive, cohesive, prosperous and vibrant communities, the distinctive character of the natural and built environment is protected and enhanced and where people enjoy more sustainable, healthy lifestyles. The LDP makes provision for development of 4,950 dwellings over the plan period. In addition, the LDP provides for 37ha new employment land at Magor and around 5-6ha new employment land at Abergavenny, Chepstow and Monmouth.

### *Forest of Dean Adopted Core Strategy*

- 3.5 The Forest of Dean lies to the southeast of Herefordshire. The [Forest of Dean Adopted Core Strategy 2012-2026](#) (2012) is the principal document in the Forest of Dean's Local Development Framework. The vision of the Core Strategy is to make the Forest of Dean a thriving, sustainable community with a high quality environment, a developing local economy, housing which meets the needs of residents and safer communities. The Core Strategy aims to deliver 5,162 dwellings and approximately 85ha employment land by 2026. New housing and employment provision is to be focused in Lydney, Cinderford, Coleford and Newent.

### *South Worcestershire Development Plan*

- 3.6 South Worcestershire lies to the east of Herefordshire. The [South Worcestershire Development Plan](#) (2016) sets the strategic planning policies for the administrative areas of Malvern Hills District Council, Wychavon District Council and Worcester City Council (South Worcestershire Councils), from 2006 to 2030. Objectives of the plan relate to economic success shared by all, stronger, safer communities, a better environment and improving health and wellbeing. The Development Plan provides for about 28,400 dwellings and about 280ha employment land over the plan period.

- 3.7 **Table 3.3** lists the local plans and programmes which are of relevance to the HAP DPD.

**Table 3.3 Key local plans and programmes reviewed for the SA of the HAP DPD**

LOCAL
Herefordshire Council (2015) Herefordshire Core Strategy 2011 – 2031
Herefordshire Council (2017) Herefordshire Local Plan Travellers’ Sites Development Plan Document – Pre-submission Publication
Herefordshire Council (2017) Invest Herefordshire – Herefordshire’s Economic Vision
Herefordshire Council (2011) Waste Strategy for Herefordshire and Worcestershire 2004-2034
Herefordshire Council (2016) Herefordshire Local Transport Plan 4 2016-2031
Herefordshire Council (2005) Biodiversity Action Plan
Malvern Hills AONB Partnership (2014) Malvern Hills AONB Management Plan 2014-2019
Wye Valley AONB Partnership (2015) Wye Valley AONB Management Plan, 2015-2020
Environment Agency & Natural England (2014) River Wye SAC Nutrient Management Plan (NMP)
Environment Agency (2015) Water for life and livelihoods: The Severn River Basin District Management Plan
Herefordshire Council (2017) Local Flood Risk Management Strategy
Herefordshire Council (2009) Strategic Flood Risk Assessment for Herefordshire
Environment Agency Wales (2010) The Wye and Usk Catchment Flood Management Plan and The Severn Catchment Flood Management Plan
Herefordshire Council (2010) Green Infrastructure Strategy Herefordshire
Visit Herefordshire (2017) Hereford City Destination Management Plan 2018-2022
Visit Herefordshire (2017) Rural Herefordshire Sustainable Destination Management Plan 2018-2022
Herefordshire Council (2011) Hereford City Defences: A Conservation Management Plan
Lower Bullingham Parish Council (2017) Lower Bullingham Neighbourhood Development Plan
Belmont Rural Parish Council (2017) Belmont Rural Neighbourhood Development Plan
Dinedor Parish Council (2017) Dinedor Draft Neighbourhood Development Plan
Holmer and Shelwick Parish Council (2018) Holmer and Shelwick Neighbourhood Development Plan Informal Consultation Draft
Shropshire Council (2011) Shropshire Local Development Framework: Adopted Core Strategy 2006-2026
Powys Council (2018) Powys Local Development Plan 2011-2026
Monmouthshire Council (2014) Monmouthshire Local Development Plan 2011-2021
Forest of Dean District Council (2012) Forest of Dean Adopted Core Strategy
Malvern Hills District Council, Worcester City Council and Wychavon District Council (2016) South Worcestershire Development Plan

## Baseline Information

- 3.8 Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps to identify key sustainability issues and means of dealing with them.
- 3.9 Schedule 2 of the SEA Regulations requires information to be provided on:
- (2) *The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.*
- (3) *The environmental characteristics of areas likely to be significantly affected.*
- (4) *Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC on the conservation of wild birds and the Habitats Directive.*

- 3.10 Schedule 2 of the SEA Regulations requires data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter relationship between these factors. As an integrated SA and SEA is being carried out, baseline information relating to other 'sustainability' topics has also been included, for example information about housing, social inclusiveness, transport, energy, waste and economic growth.
- 3.11 Baseline information collated for the HAP DPD Issues and Options has been revised and updated to make use of the most recent available information sources.

### The Plan Area

- 3.12 The county town of Hereford is the main urban centre in Herefordshire. There are five market towns in the county, namely: Bromyard; Kington; Ledbury; Leominster; and, Ross-on-Wye.
- 3.13 The Hereford Area Plan will include the parishes of Hereford City, Belmont Rural and Holmer & Shelwick, as well as the parts of Dinedor and Lower Bullingham parishes which include the Hereford Enterprise Zone (see **Appendix 2** for maps). The main urban area of Hereford lies primarily in Hereford City parish.

### Social baseline information

#### Population

- 3.14 The 2011 Census estimated the resident population of Herefordshire to be 183,600 people of which 90,400 are male (49.2%) and 93,300 are female (50.8%)<sup>12</sup>. The latest population estimate for Herefordshire, the predicted mid-2016 population estimate was 189,500, of which 93,900 were male and 95,600 were female<sup>13</sup>. Almost a third of the county's residents (60,800) live in Hereford city with one-fifth of the population living in the three largest market towns – including Ross (11,200 people) Leominster (12,000) and Ledbury (10,000). Just over half of the residents (99,900) live in areas classified as rural, with around two in five (79,800) living in the most rural 'village and dispersed'<sup>14</sup>. The population projections for Herefordshire predict that the population will increase to 209,000 by 2039<sup>15</sup>.
- 3.15 Herefordshire has the 4<sup>th</sup> lowest overall population density in England at 87 people per square kilometre (or 0.87 per hectare), and the population is scattered across the 842 square miles of the county. This is substantially lower than the West Midlands average of 4.3 persons per hectare and the England average of 4.1 persons per hectare<sup>16</sup> which reflects the rural nature of the county<sup>17</sup>.
- 3.16 According to the mid-2016 population estimates<sup>18</sup>, the highest proportion of residents in Herefordshire are within the 50-54 and 65-69 year age brackets. However, the overall percentage of people in Herefordshire of working age (16-64) (59.6%) is below the national average (64.16%). Nearly 16% of the population is within the age bracket 0-15, which is below the national (16.5%) and regional averages (17.2%). The 15-19 year old age group has the highest internal migration outflow (822), followed by 20-24 year olds (1025) (however, this age bracket also has the highest internal migration inflow). The age brackets with the highest internal net migration are 55-59 year olds and 60-64 year olds.
- 3.17 Herefordshire is also predicted to experience a demographic change with an increasing elderly population. In 2014 those aged over 65 accounted for 1.4% of the population. By 2039 this age group is expected to account for 1.1% of the total population in Herefordshire. This will have implications for the economy, service provision, accommodation and health. There will be 2919 less people of working age (16-64) in 2039 compared to 2014 (60% in 2014 to 52.4% in 2039)

<sup>12</sup> 2011 Census population figure for Herefordshire Council.

<sup>13</sup> ONS (2018) Mid-2016 population estimates (by single year of age and sex) for Herefordshire Council.

<sup>14</sup> Herefordshire Council (2018) Facts and Figures about Herefordshire [online]. Available at: <https://factsandfigures.herefordshire.gov.uk/about-a-topic/population-and-demographics/population-around-the-county.aspx>

<sup>15</sup> ONS (2016) Subnational Population Projections for Local Authorities in England – 2014-based projections.

<sup>16</sup> ONS (2011) Population density.

<sup>17</sup> ONS (2011) Population density.

<sup>18</sup> ONS (2017) Population Estimates Analysis Tool. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/mid2016/relateddata>

and similarly there will be a decrease in the number of people in the 0-15 year age group (from 16.9% in 2014 to 15.8% in 2039)<sup>19</sup>.

- 3.18 93.7% of Herefordshire's population is white English/Welsh/Scottish/Northern Irish/British. This is less diverse than both the West Midlands (79.2%) and England (79.8%). This pattern is also reflected in Hereford City and Holmer and Shelwick parishes<sup>20</sup>.

**Trend/key sustainability issue:**

The age structure of the population currently shows a higher than average level of retired people. This will have implications for the economy, service provision, accommodation and health.

Population projections predict that the population of Herefordshire will increase by 8.4% by 2039 which is lower than the 16.5% rise predicted for England as a whole.

Two-fifths of residents live in rural areas of the county.

*Housing*

- 3.19 In 2011, Herefordshire contained 81,528 dwellings, of which 24,236 (29.7%) were located in Hereford City and Holmer and Shelwick parishes. Approximately 67.7% of dwellings in Herefordshire are owner occupied, which is slightly higher than the West Midlands (64.9%) and England (63.3%) averages. Only 0.98% of housing in Herefordshire is in shared ownership. Socially rented accommodation accounts for 13.9% dwellings in Herefordshire, whereas 15.5% of dwellings are privately rented. Herefordshire has less socially rented housing than both the West Midlands (19.0%) and England (17.7%). In Hereford City and Holmer and Shelwick parishes, the most common tenure is owner occupied housing. Holmer and Shelwick parish has a much higher proportion of owner occupied households, accounting for 91% of all households. A higher proportion of housing is socially rented in Hereford City (21%), which is more than in the West Midlands and England. Social housing only accounts for 1.5% dwellings in Holmer and Shelwick<sup>21</sup>. There is a high demand for affordable housing in Hereford, particularly in comparison to the rest of the county<sup>22</sup>.
- 3.20 Herefordshire has a much higher proportion of detached households (42.3%) than both the West Midlands (23.8%) and England (22.4%). Some 27.8% households are semi-detached and 17.6% are terraced. Flats, maisonettes or apartments make up 11.4% of households and the remainder of households are mobile or temporary structures, shared dwellings or other private rented accommodation<sup>23</sup>. Hereford City has a much lower proportion of detached households compared to the county average, at 16.9%. The most common housing type in Hereford City is semi-detached housing, which accounts for 34.0% of all households. Holmer and Shelwick parish consists primarily of detached housing (72.9%) with almost all other dwellings consisting of semi-detached housing (19.8%)<sup>24</sup>. In 2007-2008, 3.3% of dwellings in Herefordshire were vacant (excluding second homes) and 1.1% dwellings were second homes<sup>25</sup>.
- 3.21 The median house price in Herefordshire in September 2017 was £217,750<sup>26</sup>. House prices in Herefordshire are 8.9 times earnings<sup>27</sup>. Herefordshire has the worst housing affordability ratio in the West Midlands<sup>28</sup>.
- 3.22 The Local Housing Requirements Study Update<sup>29</sup> identified an objectively assessed need of an additional 15,400 to 16,200 homes between 2011 and 2031. The Core Strategy (2015) provides

<sup>19</sup> ONS (2016) Subnational Population Projections, Local Authorities in England: SNPP Z1.

<sup>20</sup> *Ibid*

<sup>21</sup> ONS (2011) Neighbourhood Statistics, Tenure tables KS402EW

<sup>22</sup> Herefordshire Council (2010) Hereford Area Plan Scoping Report

<sup>23</sup> ONS (2011) Neighbourhood Statistics, Households tables QS402EW

<sup>24</sup> *Ibid*

<sup>25</sup> ONS (2009) Neighbourhood Statistics, Vacant Dwellings (2007-2008)

<sup>26</sup> ONS (2018) House price to residence-based earnings ration. Available at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoresidencebasedearningslowerquartileandmedian>

<sup>27</sup> *Ibid*.

<sup>28</sup> Herefordshire Council (2015) Herefordshire Local Plan Core Strategy

for a minimum of 16,500 homes in this period. Of the 16,500 homes required by the Core Strategy, 6,500 of these are allocated to Hereford, 4,700 of them to other urban areas (Bromyard, Kington, Ledbury, Leominster and Ross-on-Wye) and 5,300 of them to rural settlements.

- 3.23 According to the 2017 Herefordshire Authority Monitoring Report, in 2016/17 there were 405 net completions, of which 45% were in Hereford. The provision of affordable housing is increasing each year and in 2016/17 there were 135 affordable houses provided. When compared to the net requirements from the Core Strategy with the net completions since 2011, there is a difference of -1,471 dwellings<sup>30</sup>.
- 3.24 The five year housing land supply (2017-2022) published in April 2017 states that 191 dwellings have been completed in Hereford since 2011. This completion figure set against the target for delivery of 800 dwellings shows that a further 600 dwellings should be delivered to meet the Core Strategy growth targets for this area. In addition, commitments within this area amount to 162 dwellings yet to come forward some of which are under construction. Based on recent year's performance, a build out rate of 50 dwellings per annum for years 4 and 5 is forecast<sup>31</sup>.
- 3.25 The projected number of households in the authority is forecast to grow by 18.3% between 2014 and 2039 which is below the England average (23.1%).

#### **Trend/key sustainability issue:**

In Herefordshire 3.3% of dwellings were vacant (excluding second homes) and 1.1% dwellings were second homes, this is higher than the national average of 2.5%.

The median house price in Herefordshire is £217,750, with house prices being 8.9 times earnings, making Herefordshire the county with the worst housing affordability ratio in the West Midlands. There is a need for affordable housing, particularly in Hereford, due to average house prices being higher than the regional and national averages. Provision of affordable housing is increasing each year and in 2016/17 there were 135 affordable houses provided.

#### **Social inclusion and deprivation**

- 3.26 The English Indices of Deprivation 2015<sup>32</sup> is a measure of multiple deprivation in small areas or neighbourhoods, called Lower-layer Super Output Areas (LSOA), in England. Seven domains of deprivation are measured: Income Deprivation; Employment Deprivation; Health Deprivation and Disability; Education, Skills and Training Deprivation; Crime; Barriers to Housing and Services; and Living Environment Deprivation. Each domain contains a number of indicators. The seven domains are combined to give a multiple deprivation score. There are 116 LSOAs in Herefordshire and 32,844 nationally<sup>33</sup>.
- 3.27 Herefordshire contains one LSOA in the 10% most deprived in the country (Herefordshire 017D) (see **Appendix 2**). This lies within the Hereford City parish boundary. Four of the 20% most deprived LSOAs in the country surround this and also lie within the Hereford City parish. Two of the 10% least deprived LSOAs lie to the east of Hereford, within the Hereford City parish. Three of the 20% least deprived LSOAs also lie within the Hereford City parish boundary, one to the northwest, one to the northeast and one to the east, which borders the two LSOAs in the 10% least deprived<sup>34</sup>.

<sup>29</sup> Herefordshire Council (2014) Local Housing Requirements update 2014 [online] Available at: [https://www.herefordshire.gov.uk/downloads/download/97/local\\_housing\\_requirements\\_study](https://www.herefordshire.gov.uk/downloads/download/97/local_housing_requirements_study)

<sup>30</sup> Herefordshire Council (2017) Authority monitoring report for the Local Development Scheme [online] Available at: [https://www.herefordshire.gov.uk/downloads/download/71/authority\\_monitoring\\_reports](https://www.herefordshire.gov.uk/downloads/download/71/authority_monitoring_reports)

<sup>31</sup> Herefordshire Council (2017) Five year housing land supply (2017-2022) Available at: [https://www.herefordshire.gov.uk/downloads/file/13203/amr\\_2017\\_-\\_appendix\\_b\\_5\\_year\\_supply\\_april\\_17](https://www.herefordshire.gov.uk/downloads/file/13203/amr_2017_-_appendix_b_5_year_supply_april_17)

<sup>32</sup> Department for Communities and Local Government (2015) *The English Indices of Deprivation 2015*. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2015>

<sup>33</sup> Ibid.

<sup>34</sup> Ibid.

- 3.28 In 2016, the Department for Business, Energy & Industrial Strategy published detailed statistics on the level of fuel poverty in 2014, which shows that the area's fuel poverty fell to 15.1%. This is higher than fuel poverty rates for the West Midlands (12.1%) and England (10.6%)<sup>35</sup>. A household is considered to be fuel poor if they have required fuel costs that are above the national median level and were they to spend that amount, they would be left with a residual income below the poverty line<sup>36</sup>. Fuel poverty is a significant factor contributing to excess winter deaths (225 in total in 2014/15)<sup>37</sup>.
- 3.29 Herefordshire is generally performing well under the health deprivation and disability domain of the indices with 1 LSOA within the 10% most deprived in the country, 1 LSOA within the 20% most deprived and a further 15 LSOAs within the 30% most deprived nationally which highlights the poor state of health of some residents in the county. Furthermore, there are over 40 LSOAs within the 10% most deprived and 9 LSOAs within the 20% most deprived under the living environment deprivation domain. Additionally, 41 LSOAs are within the 10% most deprived in the country which are classified as having barriers to housing and services.

**Trend/key sustainability issue:**

While the overall level of deprivation is low in the county, there are pockets of high deprivation in Hereford City, and the county performs particularly poorly under the barriers to housing and services domain and the living environment deprivation domain.

A higher than average number of households are considered to be fuel poor in the county.

*Health*

- 3.30 Residents of Herefordshire experience varied health. About 14.7% (4,400) of children live in poverty<sup>38</sup>. This is significantly lower than the national average of 28% of children living in poverty<sup>39</sup>. Life expectancies for both men and women are higher than the national average, at 83.9 years for women and 80.4 years for men<sup>40</sup>. Health inequalities exist, as the average life expectancy for men in the least deprived areas is 4.3 years more than those in the most deprived areas. Women in the least deprived areas can expect to live 2.3 years longer than those in the most deprived areas<sup>41</sup>.
- 3.31 In children the prevalence of obesity is 19.8%, while the combined figure for obese and overweight children is 33.8%. These figures are higher than the regional and national averages<sup>42</sup>. Alcohol-specific hospital stays and levels of smoking for those under 18 are worse than the England average, although these are better than the England average for adults<sup>43</sup>. 63.3% adults in Herefordshire are physically active, which is greater than both the West Midlands (55.5%) and England as a whole (57.0%). Participation in sport at least once a week has generally been increasing year on year since 2011/12<sup>44</sup>. The local priorities for health and wellbeing in Herefordshire include reducing alcohol-related harm, stopping smoking and improving the dental health of children<sup>45</sup>.

<sup>35</sup> Department for Business, Energy & Industrial Strategy (2014) Sub-regional fuel poverty data: low income high costs indicator

<sup>36</sup> Department for Business, Energy & Industrial Strategy (2016) Fuel poverty statistics, available at: <https://www.gov.uk/government/collections/fuel-poverty-statistics>, accessed 17/10/16

<sup>37</sup> Herefordshire Council (2018) Understanding Herefordshire Joint Strategic Assessment 2017 [pdf] Available at: <https://factsandfigures.herefordshire.gov.uk/media/53992/understanding-herefordshire-2017-jsna-final-v20-23-08-17.pdf>

<sup>38</sup> Public Health England (2017) Herefordshire Health Profile 2017

<sup>39</sup> Herefordshire Council (2017) Facts and Figures about Herefordshire, available at: <https://factsandfigures.herefordshire.gov.uk/media/53992/understanding-herefordshire-2017-jsna-final-v20-23-08-17.pdf>, accessed 18/05/18

<sup>40</sup> Herefordshire Council (2017) Facts and Figures about Herefordshire, available at: <https://factsandfigures.herefordshire.gov.uk/media/53992/understanding-herefordshire-2017-jsna-final-v20-23-08-17.pdf>, accessed 18/05/18

<sup>41</sup> Public Health England (2017) Herefordshire Health Profile 2017

<sup>42</sup> *Ibid*

<sup>43</sup> *Ibid*

<sup>44</sup> Sport England (2016) Local Sport Profile for Herefordshire

<sup>45</sup> Public Health England (2017) Herefordshire Health Profile 2017

- 3.32 There are 30 GP surgeries in Herefordshire, four of which are in Hereford (see **Appendix 2**). There are also 30 dental surgeries in the county. There are seven hospitals within Herefordshire. The primary NHS hospital is the County Hospital in Hereford, which has an accident and emergency department. This hospital has been upgraded from 'inadequate' to 'requires improvement' by the Care Quality Commission<sup>46</sup>. There is one private hospital, two specialist mental health hospitals and three community hospitals<sup>47</sup>.

#### **Trend/key sustainability issue:**

The population of Herefordshire performs generally better than the averages for nationally against the majority of health indicators. However childhood obesity prevalence is higher in Herefordshire than the regional and national averages, and alcohol specific hospital stays and smoking levels for under 18s is worse than the average for England.

#### *Education, skills and training*

- 3.33 There are over 100 publicly funded primary, secondary and special schools in Herefordshire. Some 59% of pupils achieve 5 or more GCSEs at grades A\*-C or equivalent, including English and mathematics. This is better than the West Midlands (55%) and England (56.6%) averages. 33.6% of Herefordshire residents have qualifications equivalent to NVQ level 4 and above. This is higher than the figure for the West Midlands as a whole (31.2%) but lower than the rate for England (37.1%)<sup>48</sup>.
- 3.34 Educational attainment is poor within six LSOAs which are classified as being within the 10% most deprived under the education, skills and training domain<sup>49</sup>. There are also an additional nine LSOAs within the 20% most deprived under the education deprivation domain.
- 3.35 In 2020, it is hoped that a new university will open in Hereford: the New Model in Technology and Engineering (NMiTE). As the name suggests, this university will focus on training in engineering and technology, with a strong practical aspect which will help 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. It will have 5,000 students by 2032<sup>50</sup>.

#### *Crime*

- 3.36 Herefordshire generally has low levels of crime and crime per 1000 population continues to be below, or at the average, for West Mercia<sup>51</sup>. From April 2017 to March 2018, the most reported crimes related to anti-social behaviour, followed by violent crim and criminal damage and arson<sup>52</sup>.

#### *Culture, leisure and recreation*

- 3.37 Leisure activities contribute to the quality of life of residents, providing amenity and opportunities for enhancing intellectual, spiritual and physical wellbeing. Additionally, they represent a tourism asset and their provision can result in economic benefits to the area.
- 3.38 Herefordshire has a range of cultural and leisure opportunities, including Eastnor Castle and Hampton Court Castle, a number of houses and gardens to visit, as well as its characteristic

<sup>46</sup> Updated in November 2016.

<sup>47</sup> NHS Choices website, available at: <http://www.nhs.uk/service-search/Hospital/Herefordshire/Results/3/-2.746/52.102/7/10126?distance=25>, accessed 17/10/16

<sup>48</sup> ONS (2011) Neighbourhood Statistics, Qualifications Gained

<sup>49</sup> Department for Communities and Local Government (2015) *The English Indices of Deprivation 2015*. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2015>

<sup>50</sup> <http://nmite.org.uk/about/>

<sup>51</sup> Herefordshire Council (2018) Facts and Figures about Herefordshire [online] Available at: <https://factsandfigures.herefordshire.gov.uk/about-a-topic/community-safety/overall-crime-levels.aspx>

<sup>52</sup> UKCrimeStats (2018) Herefordshire County Council, England [online] Available at: <http://www.ukcrimestats.com/Subdivisions/CTY/2228/>

market towns. Hereford city is home to the Hereford Museum and Art Gallery and The Old House, a well preserved example of a 17<sup>th</sup> century timber framed building.

- 3.39 Many visitors to Herefordshire come for its countryside, including the Wye Valley in the south of the county and the wealth of walking opportunities across the county. There is a network of public rights of way (PROW) across the countryside including promoted routes such as the Wye Valley Walk and the Three Rivers Ride (see **Appendix 2**). The Offa's Dyke Path, a National Trail, passes through the county near Kington. National Cycle Network (NCN) routes 44 and 46 start from Hereford. Route 44 is local but route 46 offers a cycle route between Hereford and Abergavenny. Route 825 passes through Kington and route 423 offers a scenic link between Goodrich and south east Wales<sup>53</sup>. The county also contains Queenswood Country Park near Bodenham. This includes an arboretum, semi-natural ancient woodland (a SSSI) and a Local Nature Reserve (LNR).
- 3.40 Herefordshire has a number of leisure centres managed by Halo, on behalf of Herefordshire Council. There are Halo leisure facilities in Bromyard, Kington, Ledbury, Leominster, Hereford, Ross-on-Wye and Wigmore<sup>54</sup>.
- 3.41 Herefordshire Council has prepared a number of Playing Pitch Assessments, which review provision in various parts of the county. Hereford has its own Playing Pitch Assessment<sup>55</sup>, which states that there are a total of 119 pitches for football, cricket, rugby and hockey in the area (public and private). There are also 21 tennis courts, five bowling greens, four golf courses and the county's only athletics track.
- 3.42 The Herefordshire Play Facilities Study<sup>56</sup> identified 145 sites in the county that have equipped provision for children and young people of which 48% are in the rural parishes and 52% are in urban areas.

### **Economic baseline information**

#### *Economy and employment*

- 3.43 The latest labour market statistics<sup>57</sup> from January 2017 to December 2017 show that 94,500 people in Herefordshire were employed, accounting for 78.7% of the population, which is above the national average of 78%. The three main occupations in Herefordshire in the same period were professional occupations (16.6%), skilled trades and occupations (14.9%), and elementary occupations (12%). The county's largest employment industries are wholesale and retail trade (repair of motor vehicles and motorcycles) (19.2%), and human health and social work activities (16.4%). The percentage of people employed in the motor vehicle repair and the human health and social work industry is higher in Herefordshire than in the West Midlands (17.2% and 14.2% respectively) and the UK as a whole (15.3% and 13.3% respectively). Conversely, the number of people employed in professional, scientific and technical activities (5.5%) is below the regional (6.8%) and national (8.6%) averages.
- 3.44 The proportion of people who are unemployed is 3.1% of the population which is the lower than the regional average (5.2%) and the national average (4.4%).
- 3.45 Herefordshire has a lower proportion of people with no qualifications (8.2%) compared to the regional average (10.4%) but higher than national average (7.7%), and lower earnings per worker (£466.5) compared to the averages for the West Midlands (£517.4) and the UK as a whole (£552.7). The percentage of people claiming out-of-work benefits is also lower than both the regional and national averages. The level of job density calculated as the ratio of total jobs to population aged 16-64 in Herefordshire is 0.85%, which is higher than both the regional average (0.79%) and the national average (0.84%).

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<sup>53</sup> Sustrans (2016) National Cycle Network map

<sup>54</sup> <https://www.herefordshire.gov.uk/leisure-and-culture/sports-and-sporting-venues/sports-facilities-information>

<sup>55</sup> Ruth Jackson, on behalf of Herefordshire Council (2012) Hereford Area; Herefordshire Playing Pitch Assessment

<sup>56</sup> Ruth Jackson, on behalf of Herefordshire Council (2012) Herefordshire Play Facilities Study

<sup>57</sup> Nomis (2018) Labour Market Profile – Herefordshire. Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157169/report.aspx>

### **Trend/key sustainability issue:**

78.7% of the population of Herefordshire are employed which is just above the national average. Unemployment remains below regional and national averages. Gross weekly earnings remain lower than the regional and national averages.

Reliance on traditional employment sectors and service, whereas Herefordshire has aspirations to attract business in technology and knowledge intensive sectors.

Retaining skilled members of the population is an issue for the local economy, and there is a need to improve training levels to enhance the quality of the local workforce.

### *Retail and tourism*

- 3.46 In 2015, 6.86 million people visited Herefordshire, 2.65m overnight visitors and 4.21m day visitors who between them contributed £442.81 m to the local economy. This supports about 6,688 full time equivalent jobs in the tourism industry. Tourism is strong in all the market towns, which are characteristic of the region. These provide attractions as well as places to stay, eat and shop<sup>58</sup>.
- 3.47 The main retail and cultural centre of Herefordshire is Hereford city, although market towns also play a key role. Hereford cathedral contains nationally important treasures, such as the Mappa Mundi and the Magna Carta, which draw many visitors each year. Other key attractions include Hereford Racecourse, Hereford Football Club, and the Courtyard Theatre. There are a number of festivals in Hereford throughout the year, which attract both locals and visitors. These include the Borderlines Film Festival and Herefordshire Art Week.
- 3.48 There are only around 25 hotels in Herefordshire, offering approximately 820 bedrooms (excluding guest houses / bed and breakfasts, etc.). The majority of these hotels are located around Hereford and Ross-on-Wye<sup>59</sup>.

### *Transport and accessibility*

- 3.49 The primary road network in Herefordshire generally radiates out from Hereford and Leominster (see **Appendix 2**). The A49 and A438 provide north-south and east-west links across the county respectively, via Hereford. The A44 provides an east-west link via Leominster. The A465 connects Hereford with Abergavenny and the A438 links Hereford with parts of Eastern Wales. The A40 changes into the M50 at Ross-on-Wye, offering residents access to the motorway network.
- 3.50 Herefordshire's Local Transport Plan<sup>60</sup> (LTP) covers the period 2016-2031 and sets out the Council's strategy for supporting economic growth, improving health and wellbeing and reducing the environmental impacts of transport through a range of policies and proposals. The Hereford Transport Package<sup>61</sup> 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, particularly around the main river crossing of the A49 and the bridge at St Martin's Street, which is controlled by traffic lights. As part of the Hereford Transport Package, the City Link Road was opened in December 2017 in Hereford which links Commercial Road and Edgar Street. Future transport and infrastructure improvements in Hereford include:
- the Southern Link Road in the South Wye area which will reduce congestion on Belmont Road and provide improved access to the Enterprise Zone at Rotherwas; and,

<sup>58</sup> Herefordshire Council (2018) Hereford City Destination Management Plan [pdf] Available at: <https://www.brightspacefoundation.org.uk/sites/default/files/imce/City-DMP%20Version%201.0%2030th%20November%202017.pdf>

<sup>59</sup> Bridget Baker Consulting Ltd (2012) Marches LEP Board Research into Hotel demand across the MArches

<sup>60</sup> Herefordshire Council (2016) Herefordshire Council Local Transport Plan 2016 – 2031 [online] Available at: [https://www.herefordshire.gov.uk/info/200136/travel\\_and\\_transport/220/local\\_transport\\_plan/1](https://www.herefordshire.gov.uk/info/200136/travel_and_transport/220/local_transport_plan/1)

<sup>61</sup> Herefordshire Council (2016) Hereford Transport Package [online] Available at: [https://www.herefordshire.gov.uk/info/200196/roads/252/hereford\\_2020/4](https://www.herefordshire.gov.uk/info/200196/roads/252/hereford_2020/4)

- the Hereford Bypass which will provide an alternative route for through traffic.
- 3.51 There are no commercial airports within Herefordshire, with the nearest airports being at Birmingham and Cardiff. There are four train stations within Herefordshire at Hereford, Leominster, Colwall and Ledbury. These are served by the following services:
- Arriva Trains Wales services from Milford Haven to Manchester Piccadilly.
  - Arriva Trains Wales service from Cardiff to Holyhead.
  - Great Western Railway service from Hereford to London Paddington.
  - London Midland service from Hereford to Birmingham.
- 3.52 Two further stations lie just outside the county boundaries, near Leintwardine - Hopton Heath train station and Bucknell train station.
- 3.53 Bus operators for the main services in Herefordshire are given in **Table 3.4**. Generally, urban areas (Hereford and the market towns) have a more extensive range of bus services and these are more frequent than rural areas.

**Table 3.4 Bus operators and main services in Herefordshire**

Bus operators	Bus services
Arriva Midlands North	738/740
Aston Coaches	417, 675
Belfitt Mini Coach Hire	24B
D R M (Bromyard)	420, 469, 476, 672, 674
First (in Herefordshire)	71/71A/71B, 420, 426, 437, 446, 453, 454, 477, 492
H & H Coaches / James Bevan	35
Lugg Valley Primrose Travel/Lugg Valley Travel	490, 492, 494, 495/496, 501, 502, 802
Sargeants Bros. Coaches	41, 461/462
Stagecoach in South Wales	X4, 39/39A, 39B,
Stagecoach in Wye and Dean	32, 33, 34, 36, 44, 132
Yeomans Canyon Travel	39/39A, 412, 440, 447, 449

- 3.54 The majority of households in Herefordshire own either one (41.6%) or two (30.4%) cars or vans. Car ownership is generally higher in Herefordshire than in the West Midlands and England, as 11.7% households own three or more compared to 8.0% in the West Midlands and 7.4% in England. In the City of Hereford parish, more households have at least one car (46.4%) but 26.2% households have no car, compared to 16.4% county-wide. Car ownership is much higher in Holmer and Shelwick parish, with 78.0% households owning either one or two cars and only 6.0% not owning a car or van<sup>62</sup>.
- 3.55 The most common method of travel to work is driving a car or van, which is a trend seen across the country. Some 6.3% of people in Herefordshire work from home, which is greater than in the West Midlands (3.0%) and England (3.5%). Nearly 10% of people in Herefordshire walk to work, which is similar to England as a whole, although higher than for the West Midlands. In Hereford, slightly less people drive to work (37.4%) and slightly more travel to work on foot (15.3%). More people also cycle to work (5.2%) compared to 2.5% in Herefordshire as a whole. Conversely, more people drive to work in Holmer and Shelwick (52.6%) and fewer people travel to work on foot (5.5%)<sup>63</sup>.

<sup>62</sup> ONS (2011) Neighbourhood Statistics, Car or Van Availability, table QS416EW

<sup>63</sup> ONS (2011) Neighbourhood Statistics, Method of Travel to Work, Table QS701EW

- 3.56 In 2017/18, 89 people were killed or seriously injured on Herefordshire's roads. The rate has remained, statistically speaking, unchanged since 2016, and is also one of the lowest rates in the West Midlands region for deaths or serious injuries resulting from road traffic collisions<sup>64</sup>.

**Trend/key sustainability issue:**

Traffic congestion in Hereford and strain on existing infrastructure. Poor journey times and journey time reliability, severance resulting from queueing traffic and poor air quality.

Opportunities should be sought to reduce dependence on the private car and increase public transport use and other forms of sustainable transport.

**Environmental baseline information**

*Biodiversity and geodiversity*

- 3.57 Herefordshire is a largely rural county and as such has a rich biodiversity offering (see **Appendix 2**). The countryside consists primarily of arable fields, interspersed with pasture and woodland. There are four sites of international importance for nature conservation within Herefordshire: the River Wye Special Area of Conservation (SAC), which passes through the county from Symonds Yat to Clifford, via Hereford; Wye Valley Woodlands SAC, which sit alongside the River Wye in the southern tip of the county; Downton Gorge SAC and River Clun SAC, which lie in the northern part of the county.
- 3.58 There are three National Nature Reserves (NNRs) within Herefordshire: Moccas Park, The Flits and Downton Gorge. There are also a number of NNRs bordering, or close to the boundary of Herefordshire, to the south and west. There are seven Local Nature Reserves (LNRs) in Herefordshire. These include Queenswood, which is part of the Queenswood Country Park. Queenswood LNR partially coincides with Dinmore Hill Woods SSSI. There are a total of 77 Sites of Special Scientific Interest (SSSIs) in Herefordshire, making up a total area of 5769.97 ha. Some of these are cross-boundary, including the River Teme SSSI, River Wye SSSI, Malvern Hills SSSI and Upper Wye Gorge SSSI. Of the 5,769.97ha of SSSIs, 38.05% is in favourable condition; 40.01% is in unfavourable but recovering condition; 19.89% is in unfavourable condition; and, 2.04% is classed as being in declining condition<sup>65</sup>.
- 3.59 There are 685 Local Wildlife Sites (LWS) in Herefordshire. These are spread across the county but there is generally a higher density of LWS in the west. There are also 122 Local Geological Sites in the county.
- 3.60 Within the Hereford Area Plan boundary, there are a number of notable wildlife and geodiversity sites including the River Wye SAC, three SSSIs (River Lugg; Lugg and Hampton Meadows; and River Wye), three LNRs (Belmont Meadows, Broadlands and Tupsley Quarry), eight Special Wildlife Sites and numerous Sites of Interest for Nature Conservation.
- 3.61 The county includes a range of habitats listed on the Priority Habitat Inventory, including lowland deciduous woodland, lowland meadows and pasture and lowland dry acid grassland.
- 3.62 Herefordshire Council have published an Ecological Network map<sup>66</sup>, which identifies the key areas for biodiversity in the county. This shows core areas for biodiversity, buffers around those core areas, biodiversity corridors and stepping stones, and sustainable land use areas (areas with proposals for habitat restoration or creation).

**Trend/key sustainability issue:**

Herefordshire contains many areas of high ecological value including sites of international and national importance which are under pressure from the adaptation and diversification of farming and forestry employment.

<sup>64</sup> Herefordshire Council (2018) Facts and Figures about Herefordshire [online] Available at: <https://factsandfigures.herefordshire.gov.uk/about-a-topic/community-safety/road-casualties.aspx>

<sup>65</sup> Natural England (2018) Designated Sites View [online] Available at: <https://designatedsites.naturalengland.org.uk/ReportConditionSummary.aspx?countyCode=20&ReportTitle=HEREFORDSHIRE>

<sup>66</sup> Herefordshire Biological Records Centre (2013) Herefordshire Ecological Network Map

### *Air quality*

- 3.63 The Environment Act 1995 introduced the National Air Quality Strategy and the requirement for local authorities to determine if statutory air quality objectives (AQOs) are likely to be exceeded. All local authorities now report to DEFRA on an annual basis, and have the obligation to declare Air Quality Management Areas (AQMAs) and develop action plans for improvement of air quality if objectives are likely to be exceeded.
- 3.64 There are two designated AQMAs in Herefordshire (see **Appendix 2**). The annual mean objective for nitrogen dioxide is being exceeded at Hereford AQMA. This AQMA consists of part of the A49 corridor from Holmer Road in the north, to Belmont Road in the south and extending along New Market/Blueschool Street and along Eign Street<sup>67</sup>.
- 3.65 Bargates Leominster AQMA encompasses the junction between the A44 Bargates and B4361 Dishley Street/Cursneh Road in Leominster. The annual mean objective for nitrogen dioxide is also being exceeded at this AQMA<sup>68</sup>.

#### **Trend/key sustainability issue:**

Poor air quality is experienced in certain parts of Herefordshire due to high concentrations of Nitrogen Oxide, and two AQMAs have been declared in Hereford and Leominster.

### *Water resources and flooding*

- 3.66 Herefordshire lies largely within the River Wye management catchment. Operational river catchments in the county include the Wye catchment, the Arrow, Lugg and Frome catchment and the Monnow catchment:
- The River Wye flows through Herefordshire and Hereford city. The source of the River Wye lies in the Cambrian Mountains and the river flows from the west to the southeast of the county. After leaving Herefordshire, the river flows south to join the River Severn.
  - The River Lugg flows from Pool Hill in Wales, through Leominster to join the River Wye near Hampton Bishop.
  - The River Arrow flows from west to east to join the River Lugg just south of Leominster.
  - The River Dore flows through Hereford to join the River Monnow, which forms the southern border of the county.
  - The River Monnow runs along the county's southern boundary to join the River Wye near Symonds Yat.
  - The River Frome flows roughly north to south through Herefordshire, passing through Bromyard then joining the River Lugg east of Hereford.
- 3.67 Information from the Environment Agency details the peak river flow allowances by river basin districts in England showing the anticipated changes to peak flow with consideration for climate change allowances.
- 3.68 **Table 3.5** below shows the peak river flow allowances for the River Severn Basin for a period which includes the plan period using the period 1961 to 1990<sup>69</sup> as a baseline.

**Table 3.5 Peak river flow allowances for the River Severn Basin**

Allowance category	Total potential change anticipated for the '2020s' (2015 to 2039)
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<sup>67</sup> *Ibid*

<sup>68</sup> DEFRA (date not available) AQMAs declared by Herefordshire Council, available at: [https://uk-air.defra.gov.uk/aqma/local-authorities?la\\_id=126](https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=126), accessed 17/10/16

<sup>69</sup> Environment Agency (2017) Flood risk assessments: climate change allowances [online] Available at: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances#high-allowances>

Upper end (based on scenarios at 90 <sup>th</sup> percentile)	20%
Higher central (based on scenarios at 70 <sup>th</sup> percentile)	15%
Central (based on scenarios at 50 <sup>th</sup> percentile)	10%

- 3.69 Information available from Herefordshire County Council relating to fluvial risk identifies that there is a need to consider different climate change allowances (peak river flows) to inform the location, impacts and design of a scheme depending on development vulnerability. For example, residential development allocations and proposals will need to consider a 35% and 70% increase for peak river flows, on top of the 1 in 100 year flood level. The Environment Agency has produced maps which set out the likelihood of surface water flooding in England and these should also be taken account of when considering other types of flooding. A small area of the county, around Ledbury, lies within the Severn Vale management catchment and the Leadon operational catchment. The River Leadon flows north to south through Ledbury, to join the River Severn<sup>70</sup>. In addition, the River Teme which runs from west to east in the north of the county is also within the catchment of the River Severn. The River Teme is also designated as a Surface Water Safeguarding Zone to ensure the protection of drinking water in the area.
- 3.70 The Wye catchment contains 22 natural rivers, all of which have achieved 'good' chemical status. Only 5 of these rivers are recorded as being of good ecological status, whilst 11 are of moderate and six of poor status. A total of 21 rivers are expected to achieve good status by 2027. The main reasons for not achieving good status are: sewage discharge, barriers to fish migration, impoundment for water storage, and changes in nutrient and sediment loads from agriculture<sup>71</sup>. The River Wye SAC Nutrient Management Plan (2014) is seeking to address issues of water quality, particularly in terms of nutrient loading.
- 3.71 The Arrow, Lugg and Frome catchment contains 35 natural rivers. Whilst all of these have achieved good chemical status, only six have achieved good ecological status. Of the remaining rivers, 18 are of moderate ecological status, eight are of poor and three are of bad status. By 2027, all rivers are expected to achieve good status.
- 3.72 The Monnow catchment contains ten natural rivers. All of these have achieved good chemical status, but only three have achieved good ecological status. Six rivers are of moderate ecological status and one is of poor status. All ten rivers are expected to achieve good status by 2027.
- 3.73 The Leadon catchment contains eight natural rivers. Whilst all of these are of good chemical status, none are of good ecological status. Five rivers are of moderate ecological status and three of poor status, but a total of seven rivers are expected to achieve good status by 2027.
- 3.74 There are a number of Groundwater Source Protection Zones in the county including at Leominster and Hereford.
- 3.75 Fluvial flooding (from rivers) is the largest single source of flooding in Herefordshire, accounting for 25% of flooding (see **Appendix 2**). Land drainage accounts for 11% of flooding and the source of flooding is unknown for 43% of reported flooding. It is thought that the unknown sources of flooding are likely to be largely fluvial or land drainage. Herefordshire Council has prepared a Strategic Flood Risk Assessment to assess levels and types of flooding in the county<sup>72</sup> and a new Assessment is currently being prepared to inform the development plan documents currently in production. Areas of high flood risk are primarily within the Lower Wye sub-catchment (including Hereford) extending along the River Wye between Belmont and Monmouth, with a significant amount of properties at risk from flooding events (1,253 properties). The catchment with the greatest proportional flood risk is the Upper Lugg with approximately 17% of properties at risk. Smaller settlements with a significant history of flood disruption include Bosbury, Eardisland, Ewyas Harold, Hampton Bishop, Hereford, Kington, Leintwardine, Leominster and Ross-on-Wye.

<sup>70</sup> Environment Agency (2016) Catchment Data Explorer, available at: <http://environment.data.gov.uk/catchment-planning/ManagementCatchment/3077>, accessed: 18/10/16

<sup>71</sup> *Ibid*

<sup>72</sup> Herefordshire Council (2009) Strategic Flood Risk Assessment

- 3.76 Water supply and wastewater treatment in Herefordshire is managed by Welsh Water (Dŵr Cymru) and Severn Trent Water. There are nine Wastewater Treatment Works in the county (at Eign, Rotherwas, Fownhope, Kingsland, Leominster, Ivington, Ross-on-Wye, Bredwardine and Kington), one Sewage Pumping Station at Bromyard, and three Water Pumping Stations (at Leominster, Ross-on-Wye, and Bredwardine). Welsh Water's 2014 Water Resources Management Plan identifies Hereford as being in water surplus (i.e. supply is greater than demand) and identifies a number of measures to increase the efficiency of water provision<sup>73</sup>. According to the Water Cycle Study<sup>74</sup>, the River Teme, Leadon and Wye are all designated Sensitive Waters (susceptible to eutrophication) under the Urban Wastewater Treatment Directive. It also identifies that there are five Environment Agency defined Water Resource Management Units in Herefordshire (four in the Wye system and one in the Teme), all of which are at 'No Water Available' status which means that at the fully licenced uptake scenario, the ecological river flow objective would be compromised. This means that any increases in demand for water e.g. population growth will have to be met through a combination of: decreased demand; increased efficiency of use; licence revocations; and seasonally or flow constrained licences. Specific to the Core Strategy (2015) and capacity at existing Sewage Waste Treatments (SWTs) the Water Cycle Study Addendum identified at the settlements of Hereford and Leominster, new permits would be required to achieve the total level of growth proposed. It was also identified that capacity at SWTs would not impact upon the delivery of housing over the plan period or such development could potentially be accommodated with appropriate monitoring of the SWT flow at the settlements of Ledbury, Ross-on-Wye, Bromyard and Kington. The addendum concluded that the Core Strategy growth target can be achieved, although significant proposals may require consultation with water companies. The River Wye Abstraction Licensing Strategy<sup>75</sup> demonstrates that there will be water available for licensing in the entirety of the catchment, with the exception of in dry, low rainfall conditions, when abstraction licenses are likely to be restricted.
- 3.77 Welsh Water confirmed in their response to the HAP Issues and Options paper that all new connections to the water network will be subject to a Grampian style planning condition on development. Furthermore, they advise that there ought to be no issues with the two Hereford Wastewater Treatment Works accommodating the level of growth proposed, however, further advice will be provided once site locations and capacities are identified.

#### **Trend/key sustainability issue:**

Significant improvements to water quality in the country are required to meet the target of 'Good Ecological Status' in all natural water bodies, or 'Good Ecological Potential' in all heavily modified water bodies, as required by the Water Framework Directive.

Herefordshire is affected to varying degrees by fluvial and surface water flooding which is primarily associated with the River Wye. The effects of climate change may increase the incidence of flooding within the county.

#### *Soil*

- 3.78 The Agricultural Land Classification (ALC) system<sup>76</sup> provides a framework for classifying land according to the extent to which its physical or chemical characteristics impose long-term limitations to agricultural use. The principal factors influencing agricultural production are soil wetness, drought and erosion. These factors together with interactions between them form the basis for classifying land use into one of five grades, where 1 describes land as excellent (land of high agricultural quality and potential) and 5 describes land as very poor (land of low agricultural quality and potential). Land falling outside these scores is deemed to be 'primarily in non-agricultural use', or 'predominantly in urban use'. Grade 3 can be further separated into grades 3a

<sup>73</sup> Dŵr Cymru Welsh Water (2014) Water Resources Management Plan

<sup>74</sup> Herefordshire Council (2009 and 2015) Water Cycle Study as updated by the Water Cycle Study - Addendum [pdf]. Available at: [https://www.herefordshire.gov.uk/downloads/file/2271/water\\_cycle\\_study\\_2009\\_and\\_at\\_https://www.herefordshire.gov.uk/download/downloads/id/4866/water\\_cycle\\_study\\_addendum.pdf](https://www.herefordshire.gov.uk/downloads/file/2271/water_cycle_study_2009_and_at_https://www.herefordshire.gov.uk/download/downloads/id/4866/water_cycle_study_addendum.pdf) [Accessed 5 June May 2018]

<sup>75</sup> Environment Agency (2016) River Wye Abstraction Licensing Strategy

<sup>76</sup> Natural England (2013) Agricultural Land Classification (ALC) system

and 3b, although this requires further local surveys and therefore such data is only available for small areas. Grades 1, 2 and 3a are considered to be best and most versatile agricultural land.

- 3.79 The majority of Herefordshire consists of grade 2 and grade 3 agricultural land (see **Appendix 2**). There are scattered areas of grade 1 land and some areas of lower quality, grades 4 and 5 land, particularly in the west of the county. Larger settlements, such as Hereford, Leominster, Ross-on-Wye, Ledbury and Bromyard do not have associated ALC grades as they are predominantly in urban use. However, the Pre-1988 Agricultural Land Classification does identify areas comprising Grade 1, 2 and 3a best and most versatile agricultural land in Hereford, Lower Bullingham and Homer & Shelwick.

**Trend/key sustainability issue:**

The majority of Herefordshire consists of best and most versatile agricultural land, which could be lost to development.

*Historic environment*

- 3.80 Herefordshire possesses a rich historic environment which includes numerous Iron Age hill forts, sites of Roman towns, defensive features such as Offa's Dyke and the border castles, together with some of the best preserved traditional framed buildings in the country. The richness of the historic environment is reflected in the number of designated heritage assets encompassing a wealth of listed buildings, registered historic parks and gardens, scheduled ancient monuments and conservation areas. There are 5,897 Listed Buildings in Herefordshire (127 Grade 1, 357 Grade II\* and 5,413 Grade II), 33 of which are on the Heritage at Risk register. There are 265 Scheduled Monuments, 30 of which are on the Heritage at Risk register and 25 Registered Parks and Gardens (11 Grade II\* and 14 Grade II), of which only Shobdon is considered to be at risk. There are also 179 Unregistered Parks and Gardens in Herefordshire.
- 3.81 There are 64 Conservation Areas in Herefordshire, including country house estates, the historic centre of Hereford, market towns and villages. Of these, two are listed on the Heritage at Risk Register namely Kington and Ross-on-Wye / Bridstow. Both conservation areas are assessed as being in very bad condition which is deteriorating. Of the total 64 Conservation Areas in the county 31 have either draft brief, brief or full appraisals<sup>77</sup> completed.
- 3.82 The Hereford Area of Archaeological Importance (AAI) encompasses the whole zone within the medieval walls of the city, together with some of the early suburbs and former monastic precincts. It was designated an AAI in 1983 (under the 1979 Ancient Monuments and Archaeological Areas Act<sup>78</sup>) due to the national significance of the historic core of Hereford. Hereford is only one of five national AAIs. Notable historic sites in the Hereford AAI include Hereford Cathedral, a place of Christian worship since the 8<sup>th</sup> century, Hereford Castle, the City Wall, Wye Bridge, Blackfriars Friary, St Francis Xavier's Church and The Old House. Hereford Cathedral is also home to one of Britain's finest medieval treasures: the Hereford Mappa Mundi. This is the largest medieval map in the world and dates back to around 1285AD. In addition to the Hereford AAI, within the Hereford Area Plan boundary, there are also 373 Listed Buildings, nine Conservation Areas, nine Scheduled Monuments, and five Unregistered Parks and Gardens.
- 3.83 There are a number of documents in the Herefordshire Core Strategy evidence base that further describe and explore the historic environment of the area. These include 'A Characterisation of the Historic Townscape of Central Hereford'<sup>79</sup> and 'Rapid Townscape Assessments' for Ledbury, Ross-on-Wye and Hereford.

**Trend/key sustainability issue:**

There are areas of significant historical importance in Herefordshire and aesthetic quality, settings and important views should be preserved and enhanced. These are continuously facing pressures

<sup>77</sup> Herefordshire Council (2011) Review of Conservation Areas within Herefordshire

<sup>78</sup> Ancient Monuments and Archaeological Areas Act 1979

<sup>79</sup> Herefordshire Council and English Heritage (2010) A Characterisation of the Historic Townscape of Central Hereford

for change.

There are 33 Listed Buildings, 30 Scheduled Monuments, one Registered Park and Garden and two Conservation Areas on the Heritage at Risk Register.

### *Landscape and townscape*

- 3.84 Herefordshire is characterised by being a largely rural area, consisting mainly of farmland with scattered woodland and settlements. The area has varied topography, with a number of hills and ridges. Herefordshire's varied landscape is reflected by the fact that it lies within five National Character Areas (NCAs):
- 98: Clun and North West Herefordshire Hills.
  - 99: Black Mountains and Golden Valley.
  - 100: Herefordshire Lowlands.
  - 101: Herefordshire Plateau.
  - 104: South Herefordshire and Over Severn<sup>80</sup>.
- 3.85 The Herefordshire Landscape Character Assessment Supplementary Planning Document (SPD)<sup>81</sup> identifies a hierarchy of landscape character units below NCA level. There are 12 Sub-Regional Character Areas, the largest and most central of which being Central Herefordshire, which includes the city of Hereford. There are 22 Landscape Types (excluding urban areas) as well as several Landscape Description Units and Land Cover Parcels, which are at a fine-grain scale.
- 3.86 The Wye Valley Area of Outstanding Natural Beauty (AONB) and the Malvern Hills AONB lie partially within Herefordshire (see **Appendix 2**). The Wye Valley AONB broadly follows the River Wye, ending just southeast of Hereford and the Malvern Hills AONB incorporating an area east and northeast of Ledbury. The Shropshire Hills AONB lies almost adjacent to the north-western part of Herefordshire, near Leintwardine. There are no national parks or Green Belt designations in or adjacent to the county.
- 3.87 The Urban Fringe Sensitivity Analysis<sup>82</sup> characterises the areas surrounding Hereford and each of the five market towns. It identifies areas of low, medium-low, medium, high-medium and high sensitivity, depending on how vulnerable key landscape characteristics are to change. **Table 3.6** provides details on the landscape sensitivity analysis of Hereford (see **Appendix 2**).
- 3.88 Hereford City Centre is currently undergoing a second phase of upgrade work, refurbishing Commercial Street which will run from May 2018 until early 2019. This project will be linked to plans to upgrade the area to be consistent with the appearance of Widemarsh Street and High Street, which will enhance the city centre as an attractive and easily accessible visitor destination for visitors and shoppers<sup>83</sup>.

**Table 3.6 Landscape sensitivity analysis of Hereford**

Sensitivity	Area
<b>Land with low sensitivity</b>	None of the land around the periphery of Hereford was assessed as falling into the lowest category of sensitivity.
<b>Land with medium-low sensitivity</b>	Holmer – Shelwick Grafton – Lower Bullingham Stretton Sugwas – Huntington
<b>Land with medium sensitivity</b>	Holmer – Shelwick King's Acre

<sup>80</sup> Natural England (2013-2014) National Character Area profiles

<sup>81</sup> Herefordshire Council and NHS Herefordshire (2004) Landscape Character Assessment

<sup>82</sup> Herefordshire Council and NHS Herefordshire (2010) Urban Fringe Sensitivity Analysis: Hereford and the Market Towns

<sup>83</sup> Herefordshire (2018) Hereford High Town Improvements [online] Available at: [https://www.herefordshire.gov.uk/info/200196/roads/252/hereford\\_2020/2](https://www.herefordshire.gov.uk/info/200196/roads/252/hereford_2020/2)

Sensitivity	Area
	Stretton Sugwas – Huntington Burghill – Pipe & Lyde
<b>Land with high-medium sensitivity</b>	Holmer – Shelwick Aylestone Hill – Hampton Bishop Grafton – Lower Bullingham Breinton King’s Acre Burghill – Pipe & Lyde
<b>Land with high sensitivity</b>	Holmer – Shelwick Aylestone Hill – Hampton Bishop River Wye Corridor Dinedor/Grafton – Lower Bullingham Grafton – Lower Bullingham Ruckhall – Merryhill Belmont Breinton Stretton Sugwas – Huntington

#### Trend/key sustainability issue:

The county has significant areas of landscape importance including the Wye Valley AONB and the Malvern Hills AONB, and areas of high landscape sensitivity around Hereford.

#### *Mineral resources*

- 3.89 The majority of mineral deposits in Herefordshire consist of superficial river sand and gravel deposits, which are largely related to the course of the main rivers in the county, such as the River Wye and the River Lugg (see **Appendix 2**). There are also areas of glacial sand and gravel resources, as well as limestone<sup>84</sup>. Herefordshire is largely underlain by Devonian Old Red Sandstone, which is a source of building stone. There are small amounts of coal in the area and the area generally has low hydrocarbon productivity<sup>85</sup>.
- 3.90 Herefordshire is in the process of preparing a Minerals and Waste Local Plan, to guide minerals and waste development and use until 2031<sup>86</sup>.

#### *Resource use / waste and recycling*

- 3.91 In 2016/17, Herefordshire Council collected 89,968 tonnes of waste, of which 78,232 tonnes was household waste and 11,737 tonnes comprised non-household waste<sup>87</sup>. Of the total amount of Local Authority Collected Waste (LACW), 38,759 tonnes was sent for recycling, composting or reuse (43%) with 51,209 tonnes (56%) not sent for recycling. Approximately 35,865 tonnes of waste was sent to landfill and 15,258 tonnes was incinerated (Energy from Waste) by Herefordshire Council. The total amount of household waste per Herefordshire household in

<sup>84</sup> British Geological Survey and Environment Transport Regions (1999) Herefordshire and Worcestershire Mineral Resources map

<sup>85</sup> British Geological Survey and Environment Transport Regions (1999) Herefordshire and Worcestershire: Resources and Constraints

<sup>86</sup> The Herefordshire Minerals and Waste Local Plan Issues and Options Paper was consulted on from 14<sup>th</sup> August to 6<sup>th</sup> October 2017.

<sup>87</sup> DEFRA (2017) ENV18 – Local authority collected waste from April 2000 to March 2017 (England and regions) and local authority data April 2016 to March 2017 (Excel). Available at: <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables>

2016/17 was 549.2kg of which 41.2% was sent for reuse, recycling, or composting. Furthermore, there was a decrease of 10kg of residual waste per household since 2015/16.

- 3.92 Herefordshire Council operate a kerbside recycling scheme. Households have a black wheeled bin for general rubbish and a green wheeled bin for mixed recycling. Recycling centres can be found at 21 locations in Herefordshire (see **Appendix 2**) including: Hereford; Bromyard; Kington; Ledbury; Leominster; and, Ross-on-Wye.

**Trend/key sustainability issue:**

57% of LACW was not sent for recycling, composting or reuse in 2016/17. Herefordshire Council’s recycling/composting rate of 43% is around average for the West Midlands authorities.

*Climate change, energy consumption and energy efficiency*

- 3.93 The [UK Climate Projections](#) (UKCP09) show that West Midlands temperatures are projected to increase, particularly over the summer months when the mean temperature could increase by 2.9°C (2050s high emissions scenario). Another key change is the intensification of a seasonal variation in rainfall patterns. The winter months are projected to become wetter with 14% more rainfall (2050s high emissions scenario), whilst summers are projected to become 17% drier under the same scenario and probability level. In addition to this seasonal variation, the intensity of rainfall events is also anticipated to increase, with the amount of precipitation falling on the wettest days in both winter and summer increasing (2050s high emissions scenario, central estimate). The projections also suggest small changes in relative humidity in summer and winter, a reduction in summer cloud cover and an increase in winter cloud cover.
- 3.94 The future changes in climate may have significant impacts across a range of sectors in North West England including health, infrastructure, economy and biodiversity<sup>88</sup>. According to the [UK Climate Change Risk Assessment 2017](#) there are a number of risks and opportunities arising from climate change for the UK which are outlined in **Table 3.7**.

**Table 3.7 Risks and opportunities arising from climate change in the UK**

Risks	Opportunities
The number of incidents of food poisoning, heat stress and heat related deaths may increase in summer.	Milder winters should reduce the costs of heating homes and other buildings, helping to alleviate fuel poverty and reducing the number of winter deaths from cold.
Domestic energy use may increase during summer months as refrigeration and air conditioning demand increases.	Domestic energy use may decrease in winter due to higher temperatures.
Wetter winters and more intense rainfall events throughout the year may result in a higher risk of flooding from rivers.	Warmer and drier summers may benefit the recreation and tourism economy.
More intense rainstorms may in some locations result in the amount of surface water runoff exceeding the capacity of drainage systems, consequently leading to more frequent and severe localised flash flooding.	UK agriculture and forestry may be able to increase production with warmer weather and longer growing seasons.
More frequent storms and floods may cause increased damage to property and infrastructure, resulting in significant economic costs.	
Periods of drought in summer could lead to soil shrinking and subsidence, causing damage to buildings and transport networks. Drought may also impact negatively on agriculture, industry and biodiversity.	

<sup>88</sup> EcoCities, 2010. The future climate of North West England. Available at: [http://media.adaptingmanchester.co.uk.ccc.cdn.faelix.net/sites/default/files/ThefutureclimateofNorthWestEngland\\_000.pdf](http://media.adaptingmanchester.co.uk.ccc.cdn.faelix.net/sites/default/files/ThefutureclimateofNorthWestEngland_000.pdf)

Risks	Opportunities
Warmer and drier summers are likely to affect the quantity and quality of water supply, which will need careful management.	
The changing climate will impact on the behaviour and distribution of species, and may encourage the spread of invasive species.	

- 3.95 The latest DECC figures<sup>89</sup> are set out in **Table 3.8** and show generally decreasing trends for CO<sub>2</sub> emissions (kilotonnes) in Herefordshire 2005-2014. The decreasing trend in emissions reflects the decrease in overall emissions for the UK during this period driven mainly by reductions in emissions from power stations, industrial combustion and passenger cars. The reduction from power stations is driven by change in the fuel mix used for electricity generation with a reduction in the amount of coal, which is a carbon intensive fuel. Emissions for many Local Authorities are heavily influenced by activities at industrial sites, and changes at a single site can have a big impact on emissions trends<sup>90</sup>.
- 3.96 In addition, the latest DECC figures<sup>91</sup> for energy consumption (in thousand tonnes of oil equivalent (ktoe)) per consuming sector and household in Herefordshire are set out in **Table 3.9**. There has been a general decreasing trend in energy consumption as well as CO<sub>2</sub> emissions. This also reflects a steady year on year decrease in total energy consumption in Great Britain with the only anomaly occurring between 2009 and 2010, when there was a small increase due to the particularly cold winter that year, resulting in a higher consumption of fuels used for heating purposes. The decreasing trend has been attributed to the impacts of the recession, as well as energy efficiency improvements and declining use particularly in the industrial and commercial sector of petroleum products and gas<sup>92</sup>.

**Table 3.8 Source of CO<sub>2</sub> Emissions in Herefordshire per Sector (2005-2015)**

Year	Industry and Commercial (kt CO <sub>2</sub> )	Domestic (kt CO <sub>2</sub> )	Transport (kt CO <sub>2</sub> )	Total (kt CO <sub>2</sub> )
2005	683.0	479.1	469.9	1,704.5
2006	685.1	483.9	461.2	1,698.3
2007	668.7	468.0	467.4	1,666.8
2008	656.4	468.7	445.4	1,630.1
2009	606.5	431.7	432.4	1,531.3
2010	652.7	465.8	431.0	1,606.3
2011	603.4	398.3	420.1	1,476.0
2012	608.6	422.6	414.5	1,495.6
2013	616.1	408.6	410.3	1,483.0
2014	589.9	347.8	419.6	1,398.2
2015	521.5	320.7	425.1	1,303.5

<sup>89</sup> DECC (2016) UK local authority and regional carbon dioxide emissions national statistics: 2005-2014

<sup>90</sup> DBEIS (2017) Local Authority Carbon Dioxide Emissions Estimates 2015 Statistical Release [pdf] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/623015/2005\\_to\\_2015\\_UK\\_local\\_and\\_regional\\_CO2\\_emissions\\_statistical\\_release.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/623015/2005_to_2015_UK_local_and_regional_CO2_emissions_statistical_release.pdf)

<sup>91</sup> DECC (2016) Total final energy consumption at regional and local authority level

<sup>92</sup> DBEIS (2017) Sub-national total final energy consumption statistics. Regional and local authority level statistics (2013 data) [pdf] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/462932/Sep\\_2015\\_-\\_Sub-national\\_total\\_fuel\\_consumption\\_factsheet\\_FINAL\\_publication\\_version\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/462932/Sep_2015_-_Sub-national_total_fuel_consumption_factsheet_FINAL_publication_version_.pdf)

**Table 3.9 Energy Consumption in Herefordshire per Sector (2005-2015)**

Year	Industry and Commercial (ktoe)	Domestic (ktoe)	Transport (ktoe)	Total (ktoe)
2005	160.2	139.3	135.8	444.2
2006	152.8	137.9	136.8	436.6
2007	149.9	133.3	139.4	431.8
2008	143.3	131.9	136.9	422.9
2009	138.0	125.8	134.1	409.7
2010	146.0	130.1	132.5	423.6
2011	136.6	117.1	130.0	396.9
2012	132.3	117.1	127.8	395.6
2013	137.9	116.1	127.3	403.6
2014	143.9	112.0	130.2	406.5
2015	138.38	110.4	130.9	392.8

**Trend/key sustainability issue:**

Herefordshire is likely to experience more extreme impacts as a result of climate change – wetter winters with greater incidences of flooding, and warmer, drier summers with greater incidences of low flow rivers (during the summer months). However, climate change also presents a number of opportunities - milder winters should reduce the costs of heating homes and other buildings, helping to alleviate fuel poverty and reducing the number of winter deaths from cold.

## Key Sustainability Issues and Likely Evolution without the Plan

- 3.97 A set of key sustainability issues for Herefordshire was identified during the Scoping stage of the SA and was presented in the Scoping Report. It is also a requirement of the SEA Regulations that consideration is given to the likely evolution of the environment in the plan area if the Hereford Area Plan DPD is not implemented. This analysis is presented in **Table 3.10** in relation to each of the key sustainability issues summarised in the boxes above.

**Table 3.10 Key sustainability issues and likely evolution without the Hereford Area Plan DPD**

Key sustainability issue	Likely evolution of the issue without implementation of the Hereford Area Plan DPD
<b>Population</b>	
<p>The age structure of the population currently shows a higher than average level of retired people. This will have implications for the economy, service provision, accommodation and health.</p> <p>Population projections predict that the population of Herefordshire will increase by 8.4% by 2039 which is lower than the 16.5% rise predicted for England as a whole.</p> <p>Two-fifths of residents live in rural areas of the county.</p>	<p>The age structure of the county is changing with an increasing elderly population. The adopted Core Strategy supports the retention of young people in the county through the provision of appropriate housing and the improvement of higher education, skills development and training facilities. Without the allocation of additional residential and employment sites in appropriate locations (through the DPD), it is less likely that the county will retain or attract young working people resulting in unchanged population characteristics for the area.</p> <p>The amount of people living in rural areas is expected to increase as the adopted Core Strategy specifies a target of 5,300 new dwellings to be provided primarily in seven rural Housing Market Areas. A number of policies in the Core Strategy aim to address the issue of access to services in rural communities. The DPD is expected to take into account the need to travel and access to services when allocating sites and so this issue will be less well</p>

Key sustainability issue	Likely evolution of the issue without implementation of the Hereford Area Plan DPD
	addressed without this document.
<b>Housing</b>	
<p>In Herefordshire 3.3% of dwellings were vacant (excluding second homes) and 1.1% dwellings were second homes, this is higher than the national average of 2.5%.</p> <p>The median house price in Herefordshire is £217,750, with house prices being 8.9 times earnings, making Herefordshire the county with the worst housing affordability ratio in the West Midlands. There is a need for affordable housing, particularly in Hereford, due to average house prices being higher than the regional and national averages. Provision of affordable housing is increasing each year and in 2016/17 there were 135 affordable houses provided.</p>	<p>The need for affordable housing would increase as house prices are expected to rise. Affordable housing and the right type of housing may not be delivered in the most appropriate locations where there is the most need. Policy H1 of the Core Strategy provides targets for the provision of affordable housing. These targets would not be met without the allocation of sites within the DPD.</p>
<b>Social inclusion and deprivation</b>	
<p>While the overall level of deprivation is low in the county, there are pockets of high deprivation in Hereford City, and the county performs particularly poorly under the barriers to housing and services domain and the living environment deprivation domain.</p> <p>A higher than average number of households are considered to be fuel poor in the county.</p>	<p>The adopted Core Strategy contains policies for employment development which will help to address deprivation. The DPD offers the opportunity to allocate sites for employment where there is the greatest need. Without the implementation of the DPD, this issue would be less well addressed.</p>
<b>Economy and employment</b>	
<p>78.7% of the population of Herefordshire are employed which is just above the national average. Unemployment remains below regional and national averages. Gross weekly earnings remain lower than the regional and national averages.</p> <p>Reliance on traditional employment sectors and service, whereas Herefordshire has aspirations to attract business in technology and knowledge intensive sectors.</p> <p>Retaining skilled members of the population is an issue for the local economy, and there is a need to improve training levels to enhance the quality of the local workforce.</p>	<p>Policy E1 in the adopted Core Strategy supports proposals which enhance employment provision and help diversify the economy of Herefordshire. The DPD offers the opportunity to allocate new employment sites which may attract technology and knowledge intensive sectors (that may otherwise not have occurred without implementation of the DPD).</p>
<b>Transport and accessibility</b>	
<p>Traffic congestion in Hereford and strain on existing infrastructure. Poor journey times and journey time reliability, severance resulting from queueing traffic and poor air quality.</p> <p>Opportunities should be sought to reduce dependence on the private car and increase public transport use and other forms of sustainable transport.</p>	<p>New development may increase congestion but the DPD offers the opportunity to allocate new, housing and employment sites that could encourage the use of sustainable transport and are allocated following consideration of their impacts on transport patterns through the SA. Without the implementation of the DPD this issue may be less well addressed.</p>

Key sustainability issue	Likely evolution of the issue without implementation of the Hereford Area Plan DPD
<b>Biodiversity and geodiversity</b>	
Herefordshire contains many areas of high ecological value including sites of international and national importance which are under pressure from the adaptation and diversification of farming and forestry employment.	Although the adopted Core Strategy has a policy on the protection of biodiversity and geodiversity (Policy LD2), the implementation of the DPD can help to conserve and enhance biodiversity by directing site allocations away from sensitive locations. Without the implementation of the DPD this issue would be less well addressed.
<b>Air quality</b>	
Poor air quality is experienced in certain parts of Herefordshire due to high concentrations of Nitrogen Oxide, and two AQMAs have been declared in Hereford and Leominster.	The Core Strategy supports improvements to air quality particularly within urban areas. Without action from the DPD to direct new development in Hereford and the rural areas to sustainable locations (close to sustainable transport modes), the trend for private car ownership and travel is likely to continue with associated emissions of air pollutants likely to increase.
<b>Water Quality</b>	
<p>Significant improvements to water quality in the country are required to meet the target of 'Good Ecological Status' in all natural water bodies, or 'Good Ecological Potential' in all heavily modified water bodies, as required by the Water Framework Directive.</p> <p>Herefordshire is affected to varying degrees by fluvial and surface water flooding which is primarily associated with the River Wye. The effects of climate change may increase the incidence of flooding within the county.</p>	Policy SD3 of the adopted Core Strategy states that development proposals should not lead to the deterioration of EU Water Framework Directive water body status. Policy SS7 seeks to minimise the risk of flooding and to make use of sustainable drainage systems. The DPD is expected to take water quality and flooding into account in the allocation of sites and so this issue will be less well addressed without the implementation of these documents.
<b>Soil</b>	
The majority of Herefordshire consists of best and most versatile agricultural land, which could be lost to development.	Policy SS7 of the adopted Core Strategy seeks to protect the best agricultural land where possible. The DPD offers the opportunity to allocate residential and employment sites in Herefords and the rural areas on brownfield or previously developed land, thereby avoiding prime quality agricultural land. Without the implementation of the DPD this issue would be less well addressed.
<b>Historic environment</b>	
<p>There are areas of significant historical importance in Herefordshire and aesthetic quality, settings and important views should be preserved and enhanced. These are continuously facing pressures for change.</p> <p>There are 33 Listed Buildings, 30 Scheduled Monuments, one Registered Park and Garden and two Conservation Areas on the Heritage at Risk Register.</p>	Policy LD4 of the adopted Core Strategy seeks to protect, conserve and enhance heritage assets and their settings. The DPD offers the opportunity to allocate sites following consideration of their impacts on the historic environment through the SA. Without the implementation of the DPD this issue may be less well addressed.
<b>Landscape</b>	
The county has significant areas of landscape importance including the Wye Valley AONB and the Malvern Hills AONB, and areas of high landscape sensitivity around Hereford.	Policy LD1 of the adopted Core Strategy seeks to conserve and enhance the natural, historic and scenic beauty of important landscapes and features. However, without the site allocations to be made in the DPD, further development may not come forward in the most appropriate locations and impacts on the landscape could be inappropriate.
<b>Climate change</b>	
Herefordshire is likely to experience more extreme impacts as a result of climate change – wetter winters with greater incidences of flooding, and warmer, drier summers with greater	Climate change is likely to have an ongoing effect regardless of the implementation of the DPD. The adopted Core Strategy sets out policies relating to mitigating and adapting to climate change. Without the implementation of the DPD, site allocations may be less well planned and could potentially be located in vulnerable

Key sustainability issue	Likely evolution of the issue without implementation of the Hereford Area Plan DPD
<p>incidences of low flow rivers (during the summer months). However, climate change also presents a number of opportunities - milder winters should reduce the costs of heating homes and other buildings, helping to alleviate fuel poverty and reducing the number of winter deaths from cold.</p>	<p>areas.</p>

## 4 Sustainability Appraisal Findings of the Residential Site Options

### Introduction

- 4.1 It is standard practice for the SA to assist in the comparison of all reasonable alternative site options being considered by the Local Planning Authority in order to identify the most sustainable options for inclusion in the Hereford Area Plan. The detailed SA matrices for the residential site options are presented in **Appendix 4** of the SA Report, and this chapter presents a summary of the findings following the appraisal of all 57 site options against the SA framework and assumptions presented in **Appendix 3**.
- 4.2 **Table 4.1** at the end of this chapter presents an overview of the assessment scores for the residential site options.

### SA Findings of the Residential Site Options

#### **SA Objective 1: Support, maintain or enhance the provision of high quality, local or easily accessible employment opportunities, suited to the changing needs of the local workforce**

- 4.3 All 57 residential site options will have minor positive effects on SA objective **1: Employment** as they are all located within Hereford (the main employment centre in the county) which will enable residents to have easy access to job opportunities. Being the hub for public transport provision, residents of the 57 site options should also have easy access to employment opportunities further afield, without necessarily having to rely on private car.

#### **SA Objective 2: Maintain or enhance conditions that enable a sustainable economy and continued investment**

- 4.4 Negligible effects have been identified for all 57 sites in relation to SA objective **2: Sustainable Economy**. Whilst the development of new residential sites are likely to draw an increased number of economically active people to Hereford seeking employment, the provision of these jobs, inward economic investment and future economic growth will be independent and not linked to the location of residential sites. Rather, this will be dependent on the provision of employment sites which will help improve the resilience of the economy and diversity of business and jobs available to the population.

#### **SA Objective 3: Sustainable regeneration**

- 4.5 The location of residential sites will not influence the range of retailers within Hereford or the number of vacant properties available for sustainable regeneration to occur. Rather, this will depend on policies within the Hereford Area Plan and decisions taken by investors. Thus, all 57 residential site options will have negligible effects on SA objective **3: Sustainable Regeneration**.

#### **SA Objective 4: Raise educational achievements throughout the county**

- 4.6 The effects of residential sites on SA objective **4: Education** will be dependent upon the proximity of sites to existing primary schools, secondary schools and further education establishments such as colleges and universities, however scores are uncertain as it is not known at this stage, or indeed the stage at which sites will be developed, if there is or will be sufficient capacity to accommodate new students. Uncertain significant positive effects are identified for eight residential sites (Ayl14, Ayl15, Hol13, Stn05, Stn21, Tup26, Tup27 and Tup28) as they are within

500m of a primary school and 1km of a secondary school. Of the 57 sites appraised, 19 sites are not within close proximity of either a primary school or secondary school and therefore uncertain significant negative effects are expected for this SA objective. Uncertain minor positive effects are identified for the remaining 30 sites as they are either within close proximity of a primary school or secondary school.

#### **SA Objective 5: Improve the health of the people of Herefordshire, reduce disparities in health geographically and demographically, and encourage healthy living for all**

- 4.7 The close proximity (800m) of healthcare facilities, open spaces and recreational routes such as public paths and cycle paths, will encourage residents to travel more on foot or bicycle and be active outdoors, which provides opportunities to lead healthier and active lifestyles. Sites which are within 800m of at least one of all three of these facilities will maximise the opportunities for residents and significant positive effects have been identified for SA objective **5: Health**. This is the case for 22 sites. A further six sites (Bel14, Cen21, Thr23, Tup25, Tup26 and Tup27) are within 800m of at least one of all three of these facilities, however these sites contain an existing area of open space which could be lost to development. It is also recognised that opportunities may be available to incorporate these into the development. Thus, mixed effects (significant positive/uncertain minor negative) are identified for these sites. The remaining sites are all within 800m of at least one of these facilities and will have minor positive effects, although six sites (Ayl14, Ayl16, Bel08, THr26a, Thr37 and Tup28) also contain an area of open space, again owing to mixed effects (minor positive/uncertain minor negative). There are no sites which are further than 800m from at least one of these facilities, or which are separated from these facilities by barriers such as main roads.

#### **SA Objective 6: Improve public realm**

- 4.8 All 57 residential site options will have negligible effects on SA objective **6: Public Realm** as the location of sites will not influence the development of high quality public realm or safe community/amenity space. Instead this will be determined by specific Hereford Area Plan policies and the design of residential sites, for which the latter is currently unknown.

#### **SA Objective 7: Reduce and prevent crime/fear of crime and anti-social behaviour in the county**

- 4.9 Levels of crime/ fear of crime and anti-social behaviour will not be influenced by the location of residential sites, rather this will depend on factors such as the incorporation of greenspace within developments which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. All 57 residential site options will therefore have negligible effects on SA objective **7: Crime**.

#### **SA Objective 8: Reduce poverty and, promote equality and social inclusion by closing the gap between the most deprived areas in the county and the rest of the county**

- 4.10 The location of residential developments will affect social deprivation and economic inclusion by influencing how easily people are able to access job opportunities, services and facilities, which in turn is influenced by public transport provision (bus and train) and the availability of walking and cycle paths. It is also assumed that residential sites within the top 20% deprived areas in Hereford (under the 'Barriers to Housing and Services' domain) will provide housing to the most deprived areas of the county. Sites which are within 800m of bus stops, cycle paths and a railway station or within a 20% most deprived area will provide the best access to housing and local services and facilities, and this is true for 23 site options, which will have significant positive effects for SA objective **8: Poverty and Equality**. There are 33 site options within 800m of two of the three transport modes thus minor positive effects have been identified for these sites. Only one site (Thr28) has scored negatively given that access to local services and facilities is limited to bus use only. A minor negative effect is identified for this site in relation to this SA objective.

**SA Objective 9: Reduce road traffic and congestion, pollution and accidents and improve health through physical activity by increasing the proportion of journeys made by public transport, cycling and walking**

- 4.11 Significant positive effects are expected for SA objective **9: Sustainable Transport** for eight residential sites (Ayl01, Cen08, Cen21, Cen22, Cen27, Cen30, Cen31 and Cen32) as they are located within close proximity of three or more sustainable transport modes (i.e. bus links, train stations, public rights of way and cycling routes) which would encourage residents to travel more sustainably or actively, thus reducing the need to travel by car.
- 4.12 There are 48 residential sites expected to have minor positive effects on this SA objective as they are at least within close proximity of two of the above transport modes.
- 4.13 One minor negative effect has been recorded for site Thr28 due to the lack of availability of sustainable transportation (train stations, public rights of way and cycling routes) other than bus stops which are within 800m of the site. Residents of this site may be encouraged to drive to access jobs, services and facilities which will increase road traffic and congestion.

**SA Objective 10: Improve equality of access to and engagement in quality cultural, educational, leisure, sporting, recreational and community activities for all**

- 4.14 Sites Ayl01, Cen08, Cen21, Cen22, Cen27, Cen30, Cen31 and Cen32 are expected to have significant positive effects on SA objective **10: Access to Culture, Recreation and Leisure** as they are within walking distance (800m) of three or more community services/facilities (schools, GP surgeries/hospitals, museums/galleries, libraries, village halls, sports and recreation facilities and open spaces) and three or more sustainable transport links (bus stops, railway stations or cycle paths). Housing and employment sites that are within walking distance of cultural, educational, leisure, sporting, recreational and community services and facilities will ensure that residents and employees (particularly those without a car) will be more easily able to access those facilities. Good public transport links will also be beneficial as they will enable residents and employees to reach services and facilities that are further away without having to rely on the use of private cars.
- 4.15 Minor positive effects have been identified for the remaining residential sites which are within 800m of two or more community services/facilities or two or more sustainable transport links.

**SA Objective 11: Improve access to services and facilities**

- 4.16 It has been assumed that new development, regardless of its type, would support viability or develop services and facilities appropriate to the community, either through investment in existing facilities or the development of new services and facilities. Larger sites will provide opportunities for developing more community services and facilities, and therefore are assumed to have a significant positive effect. Smaller sites are assumed to be those less than five hectares while larger sites are assumed to be those greater than five hectares. Of the 57 sites appraised, 17 residential sites have been identified as having significant positive effects on SA objective **11: Access to Services** as they are deemed to be larger sites, whilst 40 smaller sites will have minor positive effects on this objective.

**SA Objective 12: Provide everyone with the opportunity to live in good quality, affordable housing of the right type and tenure, in clear, safe and pleasant local environments**

- 4.17 All residential sites are expected to have positive effects on this SA objective, due to the nature of the proposed development. It is assumed that all housing sites will make provision for affordable housing (either onsite or by way of financial contribution). Herefordshire Council identified site capacities (i.e. number of dwellings) for 37 sites, however as not all sites had capacities identified, the range of effects on the SA objective were based on the size of the sites (in hectares). Larger sites (greater than five hectares) will provide opportunities for developing greater numbers of new and affordable homes, and therefore will have significant positive effects on SA objective **12: Housing**. This is the case for 17 sites. Smaller sites are assumed to be less than five hectares and will make a lower contribution to housing needs. This is the case for 40 sites and thus minor positive effects are expected for this objective.

### SA Objective 13: Ensure integrated, efficient and balanced land use

- 4.18 Development on brownfield land represents a more efficient use of land in comparison to the development of greenfield land as there are opportunities for the reuse of buildings and materials. Effects are uncertain depending on the design of the development and the previous use of the site. Sites which are accessible by walking, cycling or sustainable transport are also expected to reduce the need to travel thereby ensuring integrated and efficient land use.
- 4.19 Sites Ayl01, Cen08, Cen21, Cen22, Cen27, Cen30, Cen31 and Cen32 will have uncertain significant positive effects on SA objective **13: Efficient Use of Land** because they are located on brownfield land and are within 800m of three or more modes of sustainable transport. Sites Cen28, Cen29, Hol14, Stn05, Stn21, Thr28, Thr30, Thr34 and Tup22 have been identified as having uncertain minor positive effects on this objective as they are on brownfield land but are only within 800m of two sustainable transport links.
- 4.20 Of the 57 sites assessed, 24 sites will have mixed effects (minor positive/uncertain minor negative) as, whilst they are classed as small sites and within 800m of two sustainable transport links, they are located on greenfield land which means there is limited efficiency of land use compared with sites comprising brownfield land. Furthermore, 16 sites have been identified as having mixed effects (minor positive/uncertain significant negative) as they are located within 800m of two sustainable transport links but are classed as large greenfield sites.

### SA Objective 14: Value, protect and enhance the county's historic environment and cultural heritage

- 4.21 The majority of residential sites (31) are not located in, adjacent to or in close proximity to a designated or undesignated heritage asset, therefore negligible effects are identified for SA objective **14: Historic Environment** for these sites.
- 4.22 The effect of developing any site in relation to this SA objective is uncertain as it will depend on the design, scale and layout of the developments which is not known at this stage.
- 4.23 Sites Stn05, Thr30, Thr32 and Thr34 will have uncertain minor positive effects because they comprise brownfield land and either contain low quality buildings/are within a gap, or are adjacent to or have intervisibility with a Conservation Area, which could have benefits for enhancing the setting and character of Conservation Areas.
- 4.24 Moreover, sites Ayl01, Bel13, Bel15, Stm05, Stn21, Thr23, Thr24, Thr26a and Tup25 will have uncertain minor negative effects on this SA objective because they are either adjacent to the Hereford Area of Archaeological Importance, a Conservation Area that contains historic buildings or good quality open space, a Scheduled Monument, a Registered Historic Park or Garden, a large Listed Building or an existing historic building.
- 4.25 Sites Ayl15, Tup20 and Tup22 will have uncertain significant negative effects on this SA objective. Sites Ayl15 and Tup20 are both within a Conservation Area and comprise open space, therefore their development could have adverse effects on the setting of the Conservation Areas. Tup22 is in close proximity to Row Ditch Scheduled Monument and therefore intervisibility with any new development could have an adverse impact on the setting of the Scheduled Monument.
- 4.26 Sites Bel08, Cen08, Cen21, Cen22, Cen27, Cen28, Cen29, Cen30, Cen31 and Cen32 are identified as having mixed effects (uncertain minor positive/uncertain significant negative), and these scores are explained further below:
- Bel08 contains Listed Buildings including Grade II\* Belmont House and is located within an Unregistered Park and Garden (Belmont House) which may lead to adverse impacts in terms of the setting of identified heritage assets therefore an uncertain significant negative effect has been identified. However, there may be beneficial impacts in terms of the potential appropriate reuse use of the Listed Buildings within the site. Therefore, mixed effects are expected (uncertain significant negative/uncertain minor positive).
  - Cen08, Cen21, Cen22, Cen27, Cen28, Cen29, Cen30, Cen31 and Cen32 are all located within the Hereford Area of Archaeological Importance, on areas of brownfield land that are within or adjacent to a Conservation Area. Furthermore, Cen21, Cen22, Cen27, Cen30 and Cen32 also contain or intersect either a Listed Building or Scheduled Monument. As a result, all of these sites are identified as having uncertain significant negative effects. However, it is recognised

that development at these sites may provide benefits in terms of potential for enhancement of setting and character of the Conservation Area by bringing unused land into use, as well as providing opportunities for Listed Buildings to be used sustainably and thereby preserved as part of the development. Therefore, mixed effects are expected (uncertain significant negative/uncertain minor positive).

#### **SA Objective 15: Value, protect and enhance the character and built quality of settlements and neighbourhoods**

- 4.27 Where sites comprise brownfield land there may be particularly good opportunities for improving the appearance of the built environment by replacing older and possibly derelict buildings with high quality new development. However, this is uncertain as it depends largely on the appearance of the development in comparison to what was on the site previously. The character of settlements and neighbourhoods is more likely to be affected where development takes place on greenfield land and larger sites are more likely to have a more prominent impact than smaller sites. However, effects are uncertain depending on the design of the development and the contribution the land makes to the local distinctiveness and setting of an area.
- 4.28 Of the 57 residential sites, 19 have been identified as having uncertain minor positive effects on SA objective **15: Built Environment** due to being located on brownfield land. Moreover, 22 small sites which mainly or entirely comprise greenfield land have been identified as having an uncertain minor negative effect, whilst an uncertain significant negative effect is expected for 16 larger sites which entirely or mainly comprise greenfield land.

#### **SA Objective 16: Reduce the amount of waste requiring disposal and minimise the use of non-reusable materials and encourage recycling**

- 4.29 All new development will inevitably involve an increase in waste generation, particularly where sites are large in size and can therefore accommodate a higher number of households. However, new developments may offer opportunities for incorporating sustainable waste management practices although this is uncertain at this stage. Of the 57 residential sites, 40 smaller sites were identified as having uncertain minor negative effects on SA objective **16: Waste**, whilst the remaining 17 larger sites will have significant negative effects.

#### **SA Objective 17: Use natural resources and energy more efficiently**

- 4.30 Of all 57 residential sites appraised, 19 are expected to have minor positive effects in relation to SA objective **17: Natural Resources**. These sites are located on brownfield land and development may allow for opportunities to re-use buildings and materials already onsite. For one site (Hol14) the minor positive effect is expected to be combined with a minor negative effect as the site intersects with a Mineral Safeguarding Area which may result in sterilisation or loss of access to local mineral resources.
- 4.31 At the remaining 38 residential sites negative effects are expected as they mostly comprise greenfield land. Of these 38 sites, 13 also lie within or partly within a Mineral Safeguarding Area. There are 16 sites which will result in development on relatively large greenfield sites (five hectares and over) and therefore the negative effect is likely to be significant. For the remaining 22 sites, the negative effect is recorded as minor as while they would result in potentially less efficient use of natural resources at greenfield sites these sites are under five hectares. Given that the efficiency with which natural resources are used at all sites will be dependent on the design of new development coming forward, and considering that the use of materials onsite at brownfield sites will be dependent upon the former use of such sites, all effects in relation to this element of the SA objective are recorded as uncertain.

#### **SA Objective 18: Reduce Herefordshire's vulnerability to the impacts of climate change as well as its contribution to the problem**

- 4.32 Significant positive effects are expected for SA objective **18: Climate Change** for eight of the 57 residential sites (Ayl01, Cen08, Cen21, Cen22, Cen27, Cen30, Cen31 and Cen32) as they are located within close proximity of three different types of sustainable transport links (i.e. bus stops, cycle path and Hereford Railway Station) which would encourage residents to travel more sustainably, thus reducing the need to travel by car and greenhouse gas emissions in the County.

For the remaining 49 residential sites, minor positive effects are expected in relation to this SA objective as they are at least within close proximity of two types of sustainable transport links. None of the residential sites appraised are expected to have a negative effect in relation to this SA objective as they all are within close proximity of at least two different types of sustainable transport links.

#### **SA Objective 19: Value, maintain, restore and expand county biodiversity**

- 4.33 Sites that are within or close to an internationally or nationally conservation site could have a particularly adverse effect on the biodiversity or geodiversity of those sites, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure etc. Proximity of sites to locally designated sites as well as areas of ancient woodland and areas listed on the Priority Habitat Inventory have also been considered as part of this SA objective. Furthermore where a site is located within a Green Infrastructure Corridor or Green Infrastructure Enhancement Zone it is expected that an adverse effect would also result given that the integrity of green infrastructure in the County could be detrimentally impacted upon. While proximity to sites of importance in terms of biodiversity provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.
- 4.34 Uncertain significant negative effects are expected in relation to SA objective **19: Biodiversity** for four of the residential sites appraised (Ayl15, Bel08, Cen29 and Tup20) as they are located within 250m of one of the international or national biodiversity sites in the County. For the remaining 53 sites, uncertain minor negative effects are expected as they are either between 250m and 1km of an international or national conservation site or are located within a local biodiversity site, a Green Infrastructure Corridor or a Green Infrastructure Enhancement Zone.

#### **SA Objective 20: Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces**

- 4.35 Impacts on the landscape in the County are expected to be more prominent and potentially more overtly adverse where sites are on land which has been identified as having higher sensitivity to change. Assessment of this SA objective considered the findings of the Urban Fringe Sensitivity Analysis report as well as proximity to Green Infrastructure Corridors and Green Infrastructure Enhancement Zones in the County to reflect areas which may be more sensitive to change.
- 4.36 For seven residential sites (Ayl15, Bel08, Bel15, Bur10, Bur18, Thr23 and Thr24) significant negative effects have been recorded in relation to SA objective **20: Landscape** as they fall within areas of land identified as having 'high' sensitivity. The significant negative effects are uncertain for all but one of these sites (Bur08) as they also lie within a Green Infrastructure Corridor and Green Infrastructure Enhancement Zone which may allow for beneficial impacts on landscape setting if the development was to incorporate green infrastructure as part of its design.
- 4.37 For 40 residential sites, uncertain minor negative effects are expected in relation to this SA objective as they are within an area which has been identified as having 'high-medium' sensitivity or 'medium' sensitivity in the Urban Fringe Sensitivity Analysis report and/or lie within Green Infrastructure Corridors and Green Infrastructure Enhancement Areas. While the design of new development may allow for the incorporation of areas of new green infrastructure it is considered likely that there is also potential for existing green infrastructure to be fragmented as a result of new development coming forward within such areas. Only ten sites (Cen08, Cen27, Cen28, Cen29, Cen30, Cen32, Tup20, Tup22, Tup26 and Tup27) are likely to have negligible effects in relation to this SA objective as they are within areas with 'medium-low' sensitivity or are not covered by the Urban Fringe Sensitivity Analysis. These sites are also not located within Green Infrastructure Corridors or Green Infrastructure Enhancement Zones.

#### **SA Objective 21: Value, protect and enhance the quality of watercourses and maximise the efficient use of water**

- 4.38 Of the 57 residential sites, 49 are expected to have negligible effects in relation to SA objective **21: Water**. These sites are not located within a Source Protection Zone and therefore development at such locations presents a reduced risk in terms of potential for contamination to local groundwater sources. An uncertain minor negative effect is expected in relation to this SA

objective for the eight remaining sites (Cre25, Thr19, Thr21, Thr22, Thr23, Thr26a, Thr28 and Thr35) given that they are located within a Source Protection Zone. The minor negative effect is uncertain given that appropriate mitigation may be incorporated at new development to avoid adverse impacts on the quality of groundwater sources.

#### **SA Objective 22: Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment**

- 4.39 The development of greenfield land is likely to result in an increase in impermeable surfaces and may increase in flood risk in the County. Development within areas of identified high flood risk (Flood Zone 3) is similarly likely to have adverse impacts on local flood risk. Significant negative effects have been identified for six of the residential sites (Bur32, Cen21, Cen29, Hol12a, Hol12b and Thr29). Of these, five are located on greenfield land that is within Flood Zone 3 resulting in significant negative effects for SA objective **22: Flooding**. Only one of these sites (Cen29) is located on brownfield land within Flood Zone 3 resulting in an uncertain significant negative effect. Of the 57 sites appraised, 34 sites are located on greenfield land that is outside of Flood Zone 3 meaning that minor negative effects are expected in relation to this SA objective. As the remaining 17 sites are located on brownfield land outside of Flood Zone 3, development at these locations would not be expected to increase flood risk in the county and negligible effects have been recorded.

#### **SA Objective 23: Minimise noise, light and air pollution**

- 4.40 All residential sites considered are located within close proximity of at least two different types of sustainable transport link which is likely to help promote local modal shift and lead to a reduction in air pollution associated with private vehicle use. For eight of the residential sites (Ayl01, Cen08, Cen21, Cen22, Cen27, Cen30, Cen31 and Cen32) significant positive effects have been recorded for SA objective **23: Pollution** as they are within close proximity of three different types of sustainable transport links (i.e. bus stops, cycle path and Hereford Railway Station). The significant positive effects for sites Cen21, Cen22, Cen27, Cen30, Cen31 and Cen32 are expected to be combined with significant negative effects (mixed effects) as these sites are also located in close proximity to an AQMA, a railway line or main road, which would result in a high level of noise pollution to the detriment of residents at the site, and may also exacerbate air quality issues. The significant positive effect expected for site Cen08 is likely to be combined with a minor negative effect as this site is located within an area identified as likely to be subject to moderate levels of noise pollution. The minor positive effect identified for the remaining 49 residential sites is likely to be combined with a significant negative effect for 14 sites for the reasons discussed above. At seven residential sites mixed effects (minor positive/minor negative) are expected as these sites are located within close proximity to two different types of sustainable transport links, but are also identified as being within an area which may be subject to a moderate level of noise pollution from a nearby road or railway line.

#### **SA Objective 24: Value, protect and enhance soil quality and resources**

- 4.41 Of the residential sites appraised 26 sites are expected to have uncertain significant negative effects in relation to SA objective **24: Soil**. Of these 26 sites, 16 are located entirely on or mostly on Grade 1 or Grade 2 agricultural land meaning development would result in the loss of areas of higher value agricultural soils. Two of these 16 sites (Thr28 and Thr35) contain large areas of brownfield land which enables a more efficient land use to be promoted at these locations, and therefore the uncertain significant negative effects are likely to be combined with minor positive effects. Of these 26 sites, 16 sites are identified as having significant negative effects as they comprise greenfield land and are considered to be relatively large in size (over five hectares). For these sites the significant negative effects have been recorded given that development at these locations would result in the less efficient use of a large area of land. Uncertain minor negative effects have been identified for 15 sites which are smaller greenfield sites (under five hectares) and would not result in development on Best & Most Versatile Agricultural Land (i.e. Grades 1, 2 or 3a). For the remaining 16 sites, uncertain minor positive effects are expected as they would promote a more efficient use of land given that they mostly comprise brownfield land.

Table 4.1 Summary of SA scores for the residential sites

SA Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Ayl01	+	0	0	+	++	0	0	++	++	++	+	+	++?	-?	+	-?	+	++	-?	-?	0	0	++	+
Ayl14	+	0	0	++?	+/-?	0	0	+	+	+	+	+	+/-?	0?	-?	-?	-?	+	-?	-?	0	-	+	-?
Ayl15	+	0	0	++?	+	0	0	+	+	+	++	++	+/-?	--?	--?	--?	--?	+	--?	--?	0	-	+/-	--?
Ayl16	+	0	0	+	+/-?	0	0	+	+	+	+	+	+/-?	0?	-?	-?	-?	+	-?	-?	0	-	+	-?
Bel08	+	0	0	--?	+/-?	0	0	+	+	+	++	++	+/-?	+?/-?	--?	--?	--?	+	--?	--?	0	-	+	--?
Bel13	+	0	0	--?	++	0	0	++	+	+	++	++	+/-?	-?	--?	--?	--?	+	-?	-?	0	-	+	--?
Bel14	+	0	0	+	++/-?	0	0	++	+	+	+	+	+/-?	0?	-?	-?	-?	+	-?	-?	0	-	+	-?
Bel15	+	0	0	--?	++	0	0	+	+	+	++	++	+/-?	-?	--?	--?	--?	+	-?	--?	0	-	+	--?
Bur09	+	0	0	--?	++	0	0	++	+	+	++	++	+/-?	0?	--?	--?	--?	+	-?	-?	0	-	+	--?
Bur10	+	0	0	--?	+	0	0	++	+	+	+	+	+/-?	0?	-?	-?	-?	+	-?	--?	0	-	+	-?
Bur12	+	0	0	--?	+	0	0	++	+	+	+	+	+/-?	0?	-?	-?	-?	+	-?	-?	0	-	+/-	-?
Bur17	+	0	0	--?	+	0	0	++	+	+	+	+	+/-?	0?	-?	-?	-	+	-?	--?	0	-	+/-	-?
Bur18	+	0	0	--?	+	0	0	++	+	+	+	+	+/-?	0?	-?	-?	-?	+	-?	--?	0	-	+	-?
Bur21	+	0	0	--?	+	0	0	++	+	+	+	+	+/-?	0?	-?	-?	-?	+	-?	-?	0	-	+/-	--?
Bur23	+	0	0	--?	+	0	0	++	+	+	+	+	+/-?	0?	-?	-?	-?	+	-?	-?	0	-	+/-	-?
Bur29	+	0	0	--?	+	0	0	++	+	+	+	+	+/-?	0?	-?	-?	-?	+	-?	-?	0	-	+	-?
Bur30	+	0	0	--?	+	0	0	++	+	+	++	++	+/-?	0?	--?	--?	--?	+	-?	-?	0	-	+	--?
Bur31	+	0	0	--?	+	0	0	++	+	+	++	++	+/-?	0?	--?	--?	--?	+	-?	-?	0	-	+	--?
Bur32	+	0	0	--?	+	0	0	++	+	+	+	+	+/-?	0?	-?	-?	-?	+	-?	-?	0	--	+/-	-?
Cen08	+	0	0	+	++	0	0	++	++	++	+	+	++?	+?/-?	+	-?	+	++	-?	0	0	0	++/-	+
Cen21	+	0	0	+	++/-?	0	0	++	++	++	++	++	++?	+?/-?	+	--?	+	++	-?	-?	0	--?	++/-	+
Cen22	+	0	0	+	++	0	0	++	++	++	+	+	++?	+?/-?	+	-?	+	++	-?	-?	0	0	++/-	+
Cen27	+	0	0	+	++	0	0	++	++	++	+	+	++?	+?/-?	+	-?	+	++	-?	0	0	0	++/-	+
Cen28	+	0	0	+	++	0	0	+	+	+	+	+	+	+?	+?/-?	+	-?	+	-?	0	0	0	+/-	+
Cen29	+	0	0	+	++	0	0	+	+	+	+	+	+	+	+?	+?/-?	+	+	--?	0	0	--?	+/-	+
Cen30	+	0	0	+	++	0	0	++	++	++	+	+	++?	+?/-?	+	-?	+	++	-?	0	0	0	++/-	+
Cen31	+	0	0	+	++	0	0	++	++	++	+	+	+	+?	+?/-?	+	-?	+	++	-?	-?	0	++/-	+
Cen32	+	0	0	+	++	0	0	++	++	++	+	+	+	+?	+?/-?	+	-?	+	++	-?	0	0	++/-	+
Cre25	+	0	0	--?	+	0	0	+	+	+	++	++	+/-?	0?	--?	--?	--?	+	-?	-?	-?	-	+	--?
Hol12a	+	0	0	+	+	0	0	+	+	+	++	++	+/-?	0?	--?	--?	--?	+	-?	-?	0	--	+/-	--?
Hol12b	+	0	0	+	+	0	0	+	+	+	++	++	+/-?	0?	--?	--?	--?	+	-?	-?	0	--	+	--?
Hol13	+	0	0	++?	++	0	0	+	+	+	++	++	+/-?	0?	--?	--?	--?	+	-?	-?	0	-	--/+	--?
Hol14	+	0	0	+	+	0	0	+	+	+	+	+	+?	0?	+	-?	++/-	+	-?	-?	0	0	+/-	--?
Stm01	+	0	0	+	+	0	0	+	+	+	++	++	+/-?	0?	--?	--?	--?	+	-?	-?	0	-	--/+	--?
Stm05	+	0	0	+	+	0	0	+	+	+	+	+	-?/+	-?	-?	-?	-?	+	-?	-?	0	-	+	--?
Stm17	+	0	0	+	+	0	0	+	+	+	+	+	-?/+	0?	-?	-?	-?	+	-?	-?	0	-	+	--?
Stn05	+	0	0	++?	++	0	0	+	+	+	+	+	+	+	+	-?	+	+	-?	-?	0	0	--/+	+
Stn21	+	0	0	++?	++	0	0	+	+	+	+	+	+	+	-?	+	+	+	-?	-?	0	0	+	+
Thr19	+	0	0	--?	+	0	0	+	+	+	++	++	+/-?	0?	--?	--?	--?	+	-?	-?	-?	-	--/+	--?
Thr21	+	0	0	+	+	0	0	+	+	+	+	+	+/-?	0?	-?	-?	-?	+	-?	-?	-?	-	+/-	--?
Thr22	+	0	0	+	+	0	0	+	+	+	+	+	+/-?	0?	-?	-?	-?	+	-?	-?	-?	-	+	--?
Thr23	+	0	0	+	++/-?	0	0	+	+	+	++	++	+/-?	-?	--?	--?	--?	+	-?	--?	-?	-	+	--?
Thr24	+	0	0	--?	++	0	0	+	+	+	++	++	+/-?	-?	--?	--?	--?	+	-?	--?	0	-	+	--?
Thr26a	+	0	0	+	+/-?	0	0	+	+	+	++	++	+/-?	-?	--?	--?	--?	+	-?	-?	-?	-	+	--?
Thr28	+	0	0	--?	+	0	0	-	-	+	+	+	+	+	0?	+	-?	+	-?	-?	-?	0	+	+?/-?
Thr29	+	0	0	+	++	0	0	++	+	+	+	+	+/-?	0?	-?	-?	-?	+	-?	-?	0	--	+/-	-?
Thr30	+	0	0	+	++	0	0	+	+	+	+	+	+	+	+	+	-?	+	-?	-?	0	0	+/-	+
Thr32	+	0	0	+	++	0	0	+	+	+	+	+	+/-?	+	+	+	-?	+	-?	-?	0	0	+/-	+
Thr34	+	0	0	+	++	0	0	+	+	+	+	+	+	+	+	+	-?	+	-?	-?	0	0	+/-	+
Thr35	+	0	0	--?	+	0	0	+	+	+	+	+	+/-?	0?	+	-?	+	+	-?	-?	-?	0	+/-	+?/-?
Thr37	+	0	0	+	+/-?	0	0	+	+	+	+	+	+/-?	0?	-?	-?	-?	+	-?	-?	0	-	+	-?
Tup20	+	0	0	+	++	0	0	+	+	+	+	+	+/-?	--?	-?	-?	-?	+	--?	0	0	-	+	-?
Tup22	+	0	0	+	++	0	0	+	+	+	+	+	+	+	+	+	+	+	-?	-?	0	0	+	+
Tup25	+	0	0	+	++/-?	0	0	+	+	+	+	+	+/-?	--?	-?	-?	-?	+	-?	-?	0	-	+	-?
Tup26	+	0	0	++?	++/-?	0	0	++	+	+	+	+	+/-?	0?	-?	-?	-?	+	-?	0	0	-	+	--?
Tup27	+	0	0	++?	++/-?	0	0	+	+	+	+	+	+/-?	0?	-?	-?	-?	+	-?	0	0	-	+	--?
Tup28	+	0	0	++?	+/-?	0	0	+	+	+	+	+	+/-?	0?	-?	-?	-?	+	-?	-?	0	-	+	-?

## Other considerations relevant to the allocation of sites

- 4.42 In addition to preparing the Hereford Area Plan DPD, the Council is also in the process of determining a suitable route for the Hereford Bypass. Seven potential routes for the bypass were proposed in the [Hereford Transport Package](#) and subject to consultation from 6<sup>th</sup> February to 20<sup>th</sup> March 2018. The route corridor extends from the A49 (south of Hereford) to the A49 (north of Hereford). Planning permission has been granted for the Southern Link Road which stretches from the A49 (south of Hereford) to the A465. Construction of the Southern Link Road is due to begin in early 2019. The final section of the bypass from the A49 (north of Hereford) to the A4103 is not proposed in the current Hereford Transport Package and is also unlikely to come to fruition before 2031.

## Residential site options proposed for inclusion in the HAP DPD

- 4.43 Of the 57 reasonable alternative residential sites assessed in the SA Report, the following housing sites intersect the Hereford Bypass route corridor: Bel08; Cre25; Thr19; Thr21; Thr22; Thr23; Thr26a; Thr28 and Thr35. As the road route has yet to be determined, all of these sites were assessed in the SA and will be considered for inclusion in the next stage of the HAP DPD until such time as the preferred road route is finalised (expected to be announced in July 2018).
- 4.44 A number of sites are within the route corridor of the final section of the bypass, namely: Bur10; Bur12; Bur17; Bur18; Bur21; Bur23; Bur29; Bur30 and Bur31. These sites have been assessed as reasonable alternatives in this SA, however, the Council has advised that to put these sites forward for development would prejudice the road route and therefore they should not be considered for inclusion in the next iteration of the HAP DPD.
- 4.45 In addition to those sites listed in the preceding paragraph, Herefordshire Council also advised during the assessment process that several sites should not be considered further for various reasons (e.g. significant landscape or historic environment constraints) namely: Ayl01; Ayl14; Ayl15; Bel13; Bel15; Cen32; Thr24; Tup20, Tup28 and Thr30. These sites were also subject to assessment in this SA and constitute reasonable alternatives.
- 4.46 Based on the reasons above, i.e. consideration of the proposed route for the Hereford Bypass and significant landscape or historic environment constraints, out of the 57 residential reasonable alternative sites assessed in this SA Report, Herefordshire Council propose 37 residential sites as potentially suitable for development which should be considered in the Stage 3 assessment of sites (see **Table 4.2**).

**Table 4.2 Residential sites identified as potentially suitable for development**

Ayl16	Land north of St Francis Xavier's school	Stm05	Land opposite Leys Farm
Bel08	Former golf club Belmont	Stm17	Land to rear of Grafton House
Bel14	Argyll Rise, HR2 7BN	Stn05	Former health authority offices
Bur09	Land at Cot Barn Farm	Stn21	Former bus depot, Friar Street
Bur32	The Orchard, Lyde	Thr19	Land adjacent to Wyevale
Cen08	Car park opposite John Haider building	Thr21	Land west of Huntington Lane
Cen21	Edgar Street Grid	Thr22	Land east of Huntington Lane
Cen22	Land at bus station/car park	Thr23	Land north of Lower Hill Farm
Cen27	Police Station, Bath Street	Thr26a	Land at Huntington
Cen28	Fire Station, St Owens Street	Thr29	Hereford Racecourse
Cen29	Wyebridge Motors	Thr32	Land off Whitecross Road
Cen30	Land at Symonds Street	Thr34	Faraday Road
Cen31	Land adjacent to Union Walk car park	Thr35	Wyevale Garden Centre

Cre25	Wyevale nurseries	Thr37	Land at Grandstand Road (north)
Hol12a	Land at Bullingham Lane	Tup22	TA site
Hol12b	Land East of Bullingham Lane	Tup25	Land adjacent to Foley Trading Estate (Tup02)
Hol13	Grafton Lane	Tup26	Land at Queenswood Drive
Hol14	Grafton Haulage	Tup27	Land at the Paddock, Hampton Dene Road
Stm01	Land north of Redhill Cottages		

# 5 Sustainability Appraisal Findings of the Employment Site Options

## Introduction

- 5.1 This chapter presents the SA findings for the five employment site options being considered in the Hereford Area Plan. **Table 5.1** provides an overview of the SA scores given to each site following their appraisal against the SA framework and assumptions presented in **Appendix 3**. Detailed appraisal matrices for the employment sites are presented in **Appendix 5**.

## SA Findings of the Employment Site Options

### **SA Objective 1: Support, maintain or enhance the provision of high quality, local or easily accessible employment opportunities, suited to the changing needs of the local workforce**

- 5.2 The development of employment sites will have a positive impact on this objective by enhancing the provision of employment opportunities in the county. The extent of the positive impact will be affected by the size of the employment site as larger sites are likely to offer greater potential to accommodate a variety of businesses, which is likely to help increase diversity of job opportunities. All of the employment site options are greater than five hectares in size and therefore significant positive effects are identified for SA objective **1: Employment**.

### **SA Objective 2: Maintain or enhance conditions that enable a sustainable economy and continued investment**

- 5.3 The development of employment land will have a direct positive effect on this SA objective as it supports the provision of appropriate sites for new business opportunities. Larger sites offer greater potential to accommodate a variety of businesses which is likely to help improve the resilience of the economy and diversity of business. Furthermore, new employment development should result in improved opportunities for work-based training and skills development. All of the employment sites are larger than five hectares and therefore significant positive effects are identified for SA objective **2: Sustainable Economy**.

### **SA Objective 3: Sustainable regeneration**

- 5.4 The location of employment sites will not influence the range of retailers within Hereford or the number of vacant properties available for sustainable regeneration to occur. Rather, this will depend on policies within the Hereford Area Plan and decisions taken by investors. Thus, all five employment site options will have negligible effects on SA objective **3: Sustainable Regeneration**.

### **SA Objective 4: Raise educational achievements throughout the county**

- 5.5 Whilst the impact of new employment development on this SA objective is likely to be positive as it should result in improved opportunities for work-based training and skills development, the extent of this effect will be determined by the size of the employment site as larger sites are likely to offer particularly good opportunities for higher numbers of people to obtain new skills and training opportunities. All of the five employment site options are large (over five hectares) and therefore significant positive effects are identified for SA objective **4: Education**.

**SA Objective 5: Improve the health of the people of Herefordshire, reduce disparities in health geographically and demographically, and encourage healthy living for all**

- 5.6 The close proximity (800m) of open spaces, sports facilities and recreational routes such as public paths and cycle paths, will ensure that employees have good access to walking and cycle links which may encourage them to commute on foot or by bicycle and to be active in sports facilities or on open space during breaks from work. Sites which are within 800m of at least one of all three of these facilities will maximise the opportunities for employees to be active and significant positive effects are identified for all five employment sites for SA objective **5: Health**.

**SA Objective 6: Improve public realm**

- 5.7 All five employment site options will have negligible effects for SA objective **6: Public Realm** as the location of sites will not influence the development of high quality public realm or safe community/amenity space. Instead this will be determined by specific Hereford Area Plan policies and the design of employment sites, for which the latter is currently unknown.

**SA Objective 7: Reduce and prevent crime/fear of crime and anti-social behaviour in the county**

- 5.8 Levels of crime/ fear of crime and anti-social behaviour will not be influenced by the location of employment sites rather this will depend on factors such as the incorporation of greenspace within developments which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. Negligible effects have been identified for all five employment site options for SA objective **7: Crime**.

**SA Objective 8: Reduce poverty and, promote equality and social inclusion by closing the gap between the most deprived areas in the county and the rest of the county**

- 5.9 Employment sites within one of the 20% most deprived areas (according to the 'Employment Deprivation' domain in the English Indices of Deprivation) will provide employment opportunities in the most deprived areas of Herefordshire. None of the five employment site options are within such an area, therefore all sites will have negligible effects for SA objective **8: Poverty and Equality**.

**SA Objective 9: Reduce road traffic and congestion, pollution and accidents and improve health through physical activity by increasing the proportion of journeys made by public transport, cycling and walking**

- 5.10 The proximity of employment sites to public transport links will affect the extent to which employees are able to make use of non-car based modes of transport for accessing services and facilities. Where employment sites are located within walking distance to sustainable transport links there is also more likely to be good opportunities for people to commute to and from the site using non-car based modes of transport. All of the employment site options are within 800m of two sustainable transport links (bus stops, railway stations, or cycle paths). Minor positive effects are therefore expected for all five employment sites for SA objective **9: Sustainable Transport**.

**SA Objective 10: Improve equality of access to and engagement in quality cultural, educational, leisure, sporting, recreational and community activities for all**

- 5.11 Employment sites that are within walking distance (800m) of cultural, educational, leisure, sporting, recreational and community services and facilities will ensure that employees (particularly those without a car) will be more easily able to access those facilities during breaks from work. Good public transport links will also be beneficial as they will enable employees to reach services and facilities that are further away without having to rely on the use of private cars. All of the employment site options are either within 800m of two or more community services/facilities, or two or more sustainable transport links, therefore minor positive effects are expected for all five sites in relation to SA objective **10: Access to Culture, Recreation and Leisure**.

### **SA Objective 11: Improve access to services and facilities**

- 5.12 It has been assumed that new development, regardless of its type, would support viability or develop services and facilities appropriate to the community, either through investment in existing facilities or the development of new services and facilities. Larger sites will provide opportunities for developing more community services and facilities, and therefore are assumed to have a significant positive effect. All employment site options are classed as being large (more than five hectares in size) therefore significant positive effects are identified for all of these sites for SA objective **11: Access to Services**.

### **SA Objective 12: Provide everyone with the opportunity to live in good quality, affordable housing of the right type and tenure, in clear, safe and pleasant local environments**

- 5.13 The provision of good quality, affordable housing will not be influenced by the location of employment sites. Therefore, negligible effects are identified for SA objective **12: Housing** for all employment site options.

### **SA Objective 13: Ensure integrated, efficient and balanced land use**

- 5.14 Development on brownfield land represents a more efficient use of land in comparison to the development of greenfield land as there are opportunities for the reuse of buildings and materials. Effects are uncertain depending on the design of the development and the previous use of the site. Sites which are accessible by walking, cycling or sustainable transport are expected to reduce the need to travel thereby ensuring integrated and efficient land use. All employment sites are large (more than five hectares in size) therefore uncertain significant negative effects are identified for each employment site. However, the negative effects are combined with minor positive effects for each employment site as they are also within 800m of two sustainable transport links (bus stops, railway stations or cycle paths). Therefore, overall for each employment site mixed uncertain significant negative/minor positive effects are identified for SA objective **13: Efficient Use of Land**.

### **SA Objective 14: Value, protect and enhance the county's historic environment and cultural heritage**

- 5.15 Three of the employment site options are not located in, adjacent to or in close proximity to a designated or undesignated heritage asset and therefore negligible effects are identified for SA objective **14: Historic Environment** for these sites.
- 5.16 The effect of developing any site in relation to this SA objective is uncertain as it will depend on the design, scale and layout of the developments which is not known at this stage.
- 5.17 ES1 is in close proximity to the Huntington Conservation Area, which is likely to have intervisibility with the site. Given that the site is also on greenfield land, the development of such could adversely affect the Conservation Area's setting. An uncertain minor negative effect is expected for this site option.

### **SA Objective 15: Value, protect and enhance the character and built quality of settlements and neighbourhoods**

- 5.18 Where sites are on brownfield land there may be particularly good opportunities for improving the appearance of the built environment by replacing older and possibly derelict buildings with high quality new development. However, this is uncertain as it depends largely on the appearance of the development in comparison to what was on the site previously. The character of settlements and neighbourhoods is more likely to be affected where development takes place on greenfield land and larger sites are more likely to have a more prominent impact than smaller sites. However, effects are uncertain depending on the design of the development and the contribution the land makes to the local distinctiveness and setting of an area.
- 5.19 All employment site options are large (more than five hectares in size) and comprise entirely or mainly greenfield land. Therefore, uncertain significant negative effects are expected for all employment site options for SA objective **15: Built Environment**.

### **SA Objective 16: Reduce the amount of waste requiring disposal and minimise the use of non-reusable materials and encourage recycling**

- 5.20 All new development will inevitably involve an increase in waste generation, particularly where sites are large in size and can therefore accommodate a higher number of employees. However, new developments may offer opportunities for incorporating sustainable waste management practices although this is uncertain at this stage.
- 5.21 Significant negative effects are expected for all employment sites in relation to SA objective **16: Waste**, because all sites are considered to be large (more than five hectares) therefore potentially leading to a greater increase in waste generation.

### **SA Objective 17: Use natural resources and energy more efficiently**

- 5.22 All five employment sites appraised are expected to have uncertain significant negative effects in relation to SA objective **17: Natural Resources**. These sites are relatively large in size (over five hectares) and comprise greenfield land and development is therefore less likely to allow for opportunities to re-use buildings and materials already onsite. Two of these sites (ES1 and ES3) also intersect with a Mineral Safeguarding Area which may result in sterilisation or loss of access to local mineral resources. Given that the efficiency with which natural resources are used at all sites will be dependent on the design of new development coming forward, effects in relation to this element of the SA objective are recorded as uncertain.

### **SA Objective 18: Reduce Herefordshire's vulnerability to the impacts of climate change as well as its contribution to the problem**

- 5.23 All five employment sites are likely to have minor positive effects in relation to SA objective **18: Climate Change**. All sites are located within close proximity to two different types of sustainable transport link. For all sites, the transport links are bus stops and cycle paths with no sites located within close proximity to Hereford Railway Station. It is considered likely that the sites would help to promote a degree of modal shift as a result of this relatively good level of access to sustainable transport links. This, in turn, would help to reduce the level of greenhouse gas emissions which results from travel to employment sites in the County.

### **SA Objective 19: Value, maintain, restore and expand county biodiversity**

- 5.24 Uncertain minor negative effects are expected in relation to SA objective **19: Biodiversity** for all five employment sites appraised. All employment sites are located within either a Green Infrastructure Corridor or Green Infrastructure Enhancement Zone. Three sites (ES4, ES5 and ES6) are also located between 250m and 1km of a nationally or internationally designated biodiversity site. As such it is expected that there may be potential for development at all sites to result in habitat damage/loss, fragmentation, disturbance to species, air pollution and increased recreation pressure etc. Given that the design of new development which comes forward at each of these locations may present opportunities for biodiversity mitigation or even enhancement effects recorded for all sites are uncertain.

### **SA Objective 20: Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces**

- 5.25 For all five employment sites, uncertain minor negative effects have been recorded in relation to SA objective **20: Landscape**. The sites are within a Green Infrastructure Corridor and/or a Green Infrastructure Enhancement Zone. Development at these areas may result in fragmentation of such areas to the detriment of the character of the landscape, but may also allow for beneficial impacts on landscape setting if the development was to incorporate green infrastructure as part of its design. Three of these sites (ES3, ES4 and ES6) also lie within areas identified as having 'high-medium' sensitivity in the Urban Fringe Sensitivity Analysis report. The remaining two employment sites (ES1 and ES5) were identified as being within areas of 'medium-low' sensitivity.

### **SA Objective 21: Value, protect and enhance the quality of watercourses and maximise the efficient use of water**

- 5.26 Only employment site, ES1, is located within a Source Protection Zone and it is therefore considered likely that development at this location would potentially result in a risk of

contamination to local groundwater sources. A minor negative effect has been for SA objective **21: Water** for this site only. The minor negative effect is uncertain, however, given that the detailed design of development which comes forward at the site may allow for mitigation which would prevent any detrimental impacts on quality of groundwater sources. The remaining four employment sites are not located within a Source Protection Zone and therefore negligible effects are expected in relation to this SA objective.

### **SA Objective 22: Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment**

- 5.27 All five employment sites are located on mostly greenfield land. Development at these locations may result in an increase in impermeable surfaces in the County and this may increase flood risk. Only employment site ES4 is also located on Flood Zone 3 land which would place development within an area considered to be at high risk of flooding. A significant negative effect is therefore expected in relation to SA objective **22: Flooding** for this site. Minor negative effects have been recorded for the remaining four employment sites as they are not located on Flood Zone 3 land.

### **SA Objective 23: Minimise noise, light and air pollution**

- 5.28 As all employment sites are located within close proximity to at least one bus stop plus at least one cycle path, it is considered likely that providing development at these locations would help to promote modal shift amongst commuters. This approach would be beneficial in terms of helping to reduce air pollution in the County and it is expected that minor positive effects would result in relation to SA objective **23: Pollution** for all employment sites. No negative effects have been identified in relation to any of the employment sites for pollution given that they are not within or in close proximity to an AQMA. Furthermore, none of the employment sites are in close proximity to a waste management facility which might otherwise subject employees to unacceptable odour and noise emissions.

### **SA Objective 24: Value, protect and enhance soil quality and resources**

- 5.29 All of the employment sites appraised are expected to have uncertain significant negative effects in relation to SA objective **24: Soil**. All of these sites are located on greenfield land and are over five hectares and as such, development at these locations would result in the less efficient use of a large area of land. Three of these sites (ES1, ES3 and ES4) contain mostly Grade 2 agricultural land. The development of these sites would result in the loss of Best and Most Versatile Agricultural Land.

## **Employment site options proposed for inclusion in the HAP DPD**

- 5.30 Of the five reasonable alternative employment sites assessed in the SA Report, only ES1 intersects the Hereford Bypass route corridor. This site was assessed in this SA and will be considered for inclusion in the next stage of the HAP DPD until such time as the preferred road route is finalised. ES5 is within the route corridor of the final section of the bypass. This site has been assessed as a reasonable alternative in this SA, however, the Council has advised that to put this site forward for development would prejudice the road route and therefore it should not be considered for inclusion in the next iteration of the HAP DPD. Given the prominence of sites ES3 and ES4 in the landscape, the Council decided that employment buildings would not be acceptable in the northern areas of these sites and are not considered suitable for Stage 3 assessment.
- 5.31 Of the five employment reasonable alternative sites assessed in this SA Report, Herefordshire Council proposes two employment sites as potentially suitable for development which should be considered in the Stage 3 assessment of sites:
- ES1: Land at Livestock Market; and,
  - ES6: Land at Rotherwas.

**Table 5.1 Summary of SA scores for the employment sites**

SA Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
ES1	++	++	0	++	++	0	0	0	+	+	++	0	--?/+	-?	--?	--?	--?	+	-?	-?	-?	-	+	--?
ES3	++	++	0	++	++	0	0	0	+	+	++	0	--?/+	0?	--?	--?	--?	+	-?	-?	0	-	+	--?
ES4	++	++	0	++	++	0	0	0	+	+	++	0	--?/+	0?	--?	--?	--?	+	-?	-?	0	--	+	--?
ES5	++	++	0	++	++	0	0	0	+	+	++	0	+/-?	0?	--?	--?	--?	+	-?	-?	0	-	+	--?
ES6	++	++	0	++	++	0	0	0	+	+	++	0	+/-?	0?	--?	--?	--?	+	-?	-?	0	-	+	--?

## 6 Conclusion and Next Steps

### Conclusion

- 6.1 This SA Report assessed potential housing and employment site options being considered for inclusion in the Hereford Area Plan DPD against the SA Framework.

#### Residential sites

- 6.2 All residential sites will have a positive effect on SA objective **12: Housing** with significant positive effects identified for 17 sites as they are classed as large sites which will make a noteworthy contribution to meeting the housing need for the County. The residential site options are expected to have generally positive (minor or significant) effects on SA objectives **1: Employment, 8: Poverty and Equality, 9: Sustainable Transport, 10: Access to Culture, Recreation and Leisure, 11: Access to Services, 18: Climate Change** and **23: Pollution** as the sites are located in close proximity to sustainable transport links which will enable residents to access employment opportunities, services and facilities without having to rely on private cars thereby reducing the emission of greenhouse gases. For SA objective **23: Pollution**, the positive effects are combined with negative effects for half of the sites as they are located either in close proximity to an AQMA, a railway line or a main road, which would result in a high level of noise pollution for residents at the site, and may also exacerbate air quality issues.
- 6.3 Uncertain positive effects, both minor and significant, are expected for two-thirds of the sites with respect to SA objective **4: Education** as they are within close proximity to schools or colleges but the capacity to accommodate new pupils is unknown, while uncertain significant negative effects are identified for the remaining sites as they are not located within 800m of either a primary or secondary school. Positive effects are identified for the majority of sites for SA objective **5: Health**, however, for 12 sites the positive effects are combined with uncertain minor negative effects as the sites contain existing open space which may be lost to development.
- 6.4 Negative effects are more likely to occur in relation to the environmental objectives due to the potential for new development on greenfield land. Uncertain negative effects, both minor and significant, are generally expected for SA objectives **19: Biodiversity, 20: Landscape** and **22: Flooding** due to the proximity to designated nature conservation sites, sensitive landscapes, or areas of flood risk. In the main, the sites will have negligible effects on SA objective **14: Historic Environment**, however, 13 sites are expected to have uncertain significant negative effects as they are located within designated heritage assets (i.e. within the Hereford Area of Archaeological Importance or a Conservation Area).
- 6.5 For two-thirds of the sites, negative effects (both minor and significant) are expected for SA objectives **13: Efficient Use of Land, 15: Built Environment, 17: Natural Resources**, and **24: Soil** as the sites comprise greenfield land, and in some instances Best and Most Versatile Agricultural Land, which, if developed, would result in the loss of areas of higher value agricultural soils; would affect the character of settlements; and, would also represent a less efficient use of resources than development of brownfield land. For SA objective **13: Efficient Use of Land**, the negative effects are combined with positive effects as the sites are also in close proximity to sustainable transport links which are expected to reduce the need to travel thereby ensuring integrated and efficient land use. Negative effects are expected for all sites in relation to SA objective **16: Waste** as all new development will inevitably involve an increase in waste generation.
- 6.6 In general, negligible effects are identified for SA objectives **2: Sustainable Economy, 3: Sustainable Regeneration, 6: Public Realm, 7: Crime** and **21: Water** as these objectives are more likely to be influenced by the principle of development or its design, rather than by the specific location.

## Employment sites

- 6.7 Significant positive effects are identified for all five employment sites for SA objectives **1: Employment, 2: Sustainable Economy** and **4: Education** as development of these sites will enhance the provision of employment and work-based training opportunities, and the diversity of businesses within the County thereby improving the resilience of the economy. For SA objective **5: Health** significant positive effects are expected as the employment sites are within close proximity to open spaces, sports facilities and recreational routes which will encourage employees to be more active. Further significant positive effects are identified for SA objective **11: Access to Services** as the sites are relatively large in size (greater than five hectares) and will provide opportunities for the development of new community services and facilities.
- 6.8 Minor positive effects are expected for all employment sites for SA objectives **9: Sustainable Transport, 10: Access to Culture, 18: Climate Change** and **23: Pollution** as they are all within 800m of two sustainable transport links or two or more community services/facilities. This will help to promote modal shift thereby reducing the level of greenhouse gas emissions from employees using private cars to travel to employment sites or services/facilities.
- 6.9 Uncertain minor negative effects are generally identified for the employment sites with respect to SA objectives **19: Biodiversity, 20: Landscape** and **22: Flooding**. The sites are located within either a Green Infrastructure Corridor or Green Infrastructure Enhancement Zone or within close proximity to a designated conservation site. Furthermore, the sites comprise greenfield land which, if developed, may increase impermeable surfaces resulting in flood risk. Development of large greenfield sites is also a less efficient use of land than development of brownfield land and therefore mixed effects (uncertain significant negative/minor positive) are expected for SA objective **13: Efficient Use of Land**. The minor positive effect relates to the sites being in close proximity to two sustainable transport links which is expected to reduce the need to travel thereby ensuring integrated and efficient land use.
- 6.10 Uncertain significant negative effects are identified for all employment site options for SA objectives **15: Built Environment, 16: Waste, 17: Natural Resources** and **24: Soil** as the sites are relatively large greenfield sites which in some cases contain Best and Most Versatile Agricultural Land.
- 6.11 SA objectives **3: Sustainable Regeneration, 6: Public Realm, 7: Crime, 8: Poverty and Equality, 12: Housing, 14: Historic Environment** and **21: Water** will have negligible effects.

## Residential and employment site options proposed for inclusion in the HAP DPD

- 6.12 Of the 57 residential reasonable alternative sites and the five employment reasonable alternative sites, Herefordshire Council propose 37 residential sites and two employment sites as potentially suitable for development which should be considered in the Stage 3 assessment of sites. Twenty sites were discounted as potentially suitable sites for development as they were either in the route corridor of the final phase of the Hereford Bypass or for various other significant constraints (e.g. significant landscape or historic environment constraints).

## Next steps

- 6.13 Herefordshire Council will consider the assessment findings of potential housing and employment sites presented in this SA Report, alongside other technical evidence documents, which will assist in the selection of preferred site options for inclusion in the next iteration of the HAP DPD.
- 6.14 This SA Report will be available for consultation between 20<sup>th</sup> August 2018 and 8<sup>th</sup> October 2018. Following the consultation on the SA of the HAP DPD Housing and Employment Site Options Consultation document, the responses received and the findings of the SA will be considered and incorporated into the next iteration of the HAP DPD.

LUC  
August 2018