Ref-44.



Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address: www.herefordshire.gov.uk/herefordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herefordareaplan as well as at libraries and information centres across the county.

Complete the questions for as many sites as you would like to comment on. Please include the site reference for any you are making a specific comment on.

Housing

Question 1: Do you agree that the sites that have been identified as	s having potential are
the most suitable sites to consider for future housing development?	If there is a specific
site you have concerns about please identify the site in your respons	se.

If no, Site	please explain: <u>[up26</u>		
No:	х□		
Yes:			

- There is a covenant on this site preventing any future build
- My husband and I purchased this property due to the above covenant and to preserve the natural peace and pleasure it provides when overlooking such a marvellous area of outstanding beauty
- The open space is used by local and distant communities due to it being the only local site within this area
- This open space is used as access to 3 local schools, Nursery, shops and pharmacy by the local community preventing them from walking on the public highway. Essential for the health and safety of those using the schools and local amenities

- The current road network is insufficient to withstand a higher volume of traffic due to its size and
 usage, particularly when football matches/training is taking place. Accessibility to proposed site
 would be made extremely difficult and dangerous to other road users
- Queenswood Drive floods, caused by ditch overspill from water run off from grassed areas
- Existing soakaways in Queenswood Drive discharge into proposed site. Removing this system would lead to the flooding of existing property land.
- The ambiance, tranquillity and pleasure of this open space would be ruined by the removal of trees currently used by the local community and severely affect the natural wildlife using this area
- The open space is now being used by a much higher volume of people (including children) due to the additional developments currently being built within the immediate area
- Local schools ,nursery and doctors surgery are currently oversubscribed and cannot meet the demands of any additional development within this area
- The current site provides a natural habitat for wildlife including birds of prey.
- Myself and many other grandparents who do not have the facility of transport use this site as
 education for our grandchildren as a perfect place to savour the natural resources of the
 environment

	de a de Deservation de la company de la comp
	tion 2: Do you think there are other more suitable sites not shown on the plan that be considered as future housing allocations?
es:	
lo:	x□ - not in this area of Tupsley
ves	, please supply site details to identify the site:
We a	re currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18). The phases are:

	Short term, 0-5 years Medium term, 5-10 years
•	Long term, 10 + years
	stion 3: Do you think any particular sites should be developed in the short, medium or term?
Yes	
No	x□
Pleas	se explain your answer:
This	is an unreasonable question as my response is only applicable to site Tup26.
Emp	loyment
Ques	stion 4: Do you agree that the sites that have been identified as having potential are
the in	nost suitable sites to consider for future employment land development?
No:	xo
Empl	please explain: loyment in Hereford offering full time posts with salaries that can afford such erties is extremely restricted. Affordable housing is best handled by the local Housing ciations.

Yes:	x□
No:	
If yes	, please supply site details to identify the site:
	e should be on the extremities of Hereford along the line of the proposed new ring which offers direct access to a road network suitable for commuting.
(We a	are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)
for us	ation 6: Are there any sites being considered in the site options that could be suita se solely or in part for other uses such as university educational buildings, student mmodation, community and leisure uses or other commercial activities?
Yes:	VΠ
	ALL .
No:	
Ques If yes I'm su	
Ques If yes I'm su	tion 6 continued , please supply site details: ure there are, but not in a position to make this decision as more information is
Ques If yes I'm su requir	tion 6 continued , please supply site details: ure there are, but not in a position to make this decision as more information is
Ques If yes I'm su requir	tion 6 continued , please supply site details: ure there are, but not in a position to make this decision as more information is red to understand volume and type of accommodation required. tion 7: Do you think there are other more suitable sites not shown on the plan that be considered for other uses as set out in question 6 above?

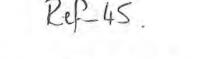
If yes, please supply site details to identify the site:	
n/a	
(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsi	ites)
Question 8: Do you have any comments on the document and the approach used identify potential sites?	d to
Yes: x□	
No: 🗆	
If yes, please explain:	
	ntaat baa
Whilst I'm sure the council has followed a legal consultation process, no direct con been made to the local community surrounding Tup26 site to provide affected local	
residents sufficient time to digest your proposals. Due to the demographic nature	
residents, not everyone has access to computers or has the ability to understand	current
processes used by the council. It is unfair and unreasonable to assume everyone	is aware
of your proposals.	
(Please use additional box at the back of questionnaire if you need more space to comment)	
About you:	
Name:Elaine	
Clayton	
Address:	
Email:	
Do you wish to be kept informed of future planning policy consultations?	

Yes	
No	
(You	have the right to withdraw your consent at any time by notifying us.)
All per 2018 share repre	ersonal data will be treated in line with our obligations under the Data Protection which includes the provisions of GDPR. This means your personal data will noted. The data collected will not be used for any other purpose. We do publish esentations but email addresses, telephone numbers and signatures will be removed.
Envir	fordshire Council is subject to the Freedom of Information Act, 2000, (Fol) and conmental Information Regulations (EIRs) which means that questionnaires may sed in response to a request for information but private information would be cted.
Detai	ils of our privacy notice can be found at www.herefordshire.gov.uk/privacynotice
	uwould like any further assistance, please contact us in one of the following way il: ldf@herefordshire.gov.uk or telephone 01432 383357
Forw Here	
Or by	email to ldf@herefordshire.gov.uk
	Please return this questionnaire by midnight on 8th October 2018
	Thank you for taking time to share your views with us.
Ques	stion 8 continued

MERSEDADSHINE COUNCIL
PLANHING SERVICES
DEVELORM VI CONTROL

0 8 OCT 2018

To:
Activity





Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address: www.herefordshire.gov.uk/herefordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herefordareaplan as well as at libraries and information centres across the county.

Complete the questions for as many sites as you would like to comment on. Please include the site reference for any you are making a specific comment on.

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:	
No:	х□

If no, please explain:

Site Tup26

- This open space is subject to a covenant that it shall always be used as a public open space and not
 to erect or permit to be erected any buildings or structures on the land at any time save for those
 appurtenant to the use of the land as a public open space
- Open space used by larger community. The impact of removing this space would be detrimental to the area and remove essential immediate open space for the well being of local (and distant) residents. It is totally unreasonable to expect families, dog owners etc to travel further afield to enjoy such a facility.
- Parents and children use this open space as access to 3 local schools, Nursery, shops and pharmacy
 preventing them from walking on the public highway. Essential for the health and safety of those
 using the schools and local amenities

- Traffic issue along Queenswood Drive is not sufficient to support additional traffic, particularly when football matches/training is taking place. Accessibility to proposed site would be made extremely difficult and dangerous to other road users
- The area is in a flood plain. Ditch overspills from run off from grassed areas which floods the road
- There are existing soakaways in this open space that takes discharge from Queenswood Drive.
 These would be removed should building take place causing back up flooding to the development.
 This is totally unacceptable to existing households.
- Trees would be felled to accommodate this proposal, totally removing the ambiance, beauty and pleasure of this open space for use by the local community
- There are already hundreds of new houses being built in the immediate area which necessitates this open space to be maintained.
- Infrastructure is not capable of withstanding more pressure from the additional developments taking place within the locality.
- Wildlife (squirrels, rabbits, hawks, buzzards etc) would be severely affected by the proposal and removing this facility from the environment would impact on the children and other users of this open space

ues ould	tion 2: Do you think there are other more suitable sites not shown on the plan that
	be considered as future housing allocations?
es:	
o:	
0:	□ x□ - not in this area of Tupsley
0:	□ x□ - not in this area of Tupsley
0:	□ x□ - not in this area of Tupsley
o:	□ x□ - not in this area of Tupsley
	□ x□ - not in this area of Tupsley

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18). The phases are:

Short term, 0-5 years

•	Medium term, 5-10 years Long term, 10 + years
	stion 3: Do you think any particular sites should be developed in the short, medium or term?
Yes	
No	x□
Pleas	se explain your answer:
This	is an unreasonable question as my response is only applicable to site Tup26.
Ques the m	loyment Stion 4: Do you agree that the sites that have been identified as having potential are nost suitable sites to consider for future employment land development?
Yes:	
No:	XD
Empl	please explain: oyment in Hereford offering full time posts with salaries that can afford such
	erties is extremely restricted. Affordable housing is best handled by the local Housing ciations.

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:	x□
No:	
If yes	, please supply site details to identify the site:
	e should be on the extremities of Hereford along the line of the proposed new ring which offers direct access to a road network suitable for commuting.
(We a	re currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)
for us	etion 6: Are there any sites being considered in the site options that could be suitable se solely or in part for other uses such as university educational buildings, student immodation, community and leisure uses or other commercial activities?
Yes:	x□
No:	
If yes	tion 6 continued , please supply site details: ure there are, but not in a position to make this decision as more information is
requii	red to understand volume and type of accommodation required.
could	tion 7: Do you think there are other more suitable sites not shown on the plan that be considered for other uses as set out in question 6 above?
Yes:	
No:	
If yes	, please supply site details to identify the site:

n/a	
(We are	currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)
Quest identify	ion 8: Do you have any comments on the document and the approach used to potential sites?
Yes:	x□
No:	
If yes,	please explain:
been n resider resider proces	I'm sure the council has followed a legal consultation process, no direct contact hat nade to the local community surrounding Tup26 site to provide affected local nts sufficient time to digest your proposals. Due to the demographic nature of local nts, not everyone has access to computers or has the ability to understand current ses used by the council. It is unfair and unreasonable to assume everyone is awar proposals.
(Please	use additional box at the back of questionnaire if you need more space to comment)
About	you:
	Peter
Addres	ss:
100000	***************************************
Fmail:	
Email:	
	wish to be kept informed of future planning policy consultations?

No	
(You	have the right to withdraw your consent at any time by notifying us.)
All per 2018 share repre	ersonal data will be treated in line with our obligations under the Data Protection A B, which includes the provisions of GDPR. This means your personal data will not be ed. The data collected will not be used for any other purpose. We do publish esentations but email addresses, telephone numbers and signatures will be remove rehand.
Envir	fordshire Council is subject to the Freedom of Information Act, 2000, (Fol) and ronmental Information Regulations (EIRs) which means that questionnaires may be used in response to a request for information but private information would be cted.
Deta	ils of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices
lf yoυ Emai	u would like any further assistance, please contact us in one of the following ways: il: ldf@herefordshire.gov.uk or telephone 01432 383357
Forw	er questionnaires can be returned by post to: ard Planning fordshire Council Offices
Ploug Herei HR4	
Or by	email to ldf@herefordshire.gov.uk
	Please return this questionnaire by midnight on 8th October 2018
	Thank you for taking time to share your views with us.
Ques	tion 8 continued



Hereford Area Plan - Housing and Employment Site Options Consultation

Contact Details

Planning and Local Authority Liaison Department

The Coal Authority 200 Lichfield Lane

Berry Hill MANSFIELD Nottinghamshire NG18 4RG

Planning Email: <u>planningconsultation@coal.gov.uk</u>

Planning Enquiries: 01623 637 119

Date

8 October 2018

<u>Hereford Area Plan - Housing and Employment Site Options Consultation</u>

Thank you for your notification of 16 August 2018 seeking the views of the Coal Authority on this above consultation.

As you will be aware Hereford area has coal mining legacy in the form of 29 mine entries, recorded and likely unrecorded coal workings at shallow depth and records of surface mining activity having taken place. Surface Coal resource is also identified as being present in the area.

We are therefore disappointed to note that land stability issues have not been identified as part of the evidence base considered to inform the site allocations. The Coal Authority provides the LPA with downloadable data in respect of Development Risk and Surface Coal Plans. We would therefore expect sites proposed for allocation to be considered against this data in order to identify any constraints to development early as early as possible in the process. Clearly any mine entries present on a site may have implications on the quantum of development which can be accommodated. The Coal Authority is of the opinion that building over the top of, or in close proximity to, mine entries should be avoided wherever possible, even after they have been capped, in line with our adopted policy:

 $\underline{https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries}\\$

The Coal Authority therefore requests that criteria are included as part of the site options process which consider land stability issues and presence of surface coal resource.

Please do not hesitate to contact me should you wish to discuss the above comments further.

Regards

Melanie Lindsley

Melanie Lindsley BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI Development Team Leader



Hereford Area Plan - Call for Sites Consultation

Contact Details

Planning and Local Authority Liaison Department

The Coal Authority 200 Lichfield Lane

Berry Hill MANSFIELD Nottinghamshire NG18 4RG

Planning Email: planningconsultation@coal.gov.uk Planning Enquiries:

01623 637 119

Date

5 October 2018

Hereford Area Plan - Call for Sites Consultation

Thank you for your notification received on the 19 September 2018 in respect of the above consultation.

I can confirm that the Coal Authority has no sites to put forward for consideration as part of your Call for Sites consultation.

Regards

Melanie Lindsley

Melanie Lindsley BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI **Development Team Leader**



Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address: www.herefordshire.gov.uk/herefordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herefordareaplan as well as at libraries and information centres across the county.

Complete the questions for as many sites as you would like to comment on. Please include the site reference for any you are making a specific comment on.

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No: 1

If no, please explain:

With reference to Tup 26 & Tup 27. We cannot believe that these are even options for building on. These are beautiful green spaces – mature trees & lovely grass areas. There is already a problem with traffic & parking in these areas. The playing fields have regular football sessions at the weekend with cars parked all over the place. The twenty extra homes plus probably two cars per household is just ridiculous - the feeder roads are just not wide enough to sustain such traffic. There is already problems with parking at the surgery too & as regards Tup 27 there is the school right opposite the proposed site again a nightmare for pedestrians & the occupants of cars parking to deliver their children to school.

If Tup 26 and Tup 27 were used for housing then that would mean removing all green space to the local area as we would only be left with the community sports playing field. The document states that any removal and loss of green space would be "compensated" but that is not possible as there

are no other green spaces available. The mature green spaces at Tup 26 & 27 are essentially beautiful and are worth saving for our children & grandchildren and it is important that we ensure that we don't send the wildlife further afield too.

We have been living in Copsewood Drive for almost a year & we have never seen so many dogs being walked from other sites in the area – heaven forbid that we are left with no field for them to run around in & we are left to clear up any dog excrement that does not reach the bin provided.

We noticed when we moved in that there was a house in Queenswood Drive that actually had sand bags at their garage. We assume this has something to do with the fact that there is a stream that runs from west to east adjacent to the playing field which we feel could be a very good reason for not plonking twenty houses there. Also we object to the inconvenience, noise & disruption to the community that these sites would produce. Unfortunately no one seems to take on board these days that noise pollution is a threat to peoples wellbeing & sanity.

We believe that Tup 26 was gifted to the community as recreational land and not to be used for building on. There may be abundance of green spaces in Hereford but that forms part of its beauty and does not mean that they should be destroyed – we should be adapting vacant buildings (of which there are many around the city) before building more.

Please leave these sites as tasters of our green Hereford countryside.

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes: √

No:

If yes, please supply site details to identify the site:

Adapt vacant buildings around the city rather than continually building afresh especially when it is at the detriment of the city's beautiful green spaces.

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No 1

Please explain your answer:

We believe Tup 26 and Tup 27 should be removed from the plan completely. More creative use of existing buildings should be planned for rather than removing green spaces.

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?
Yes:
No: √
If no, please explain:
We would ensure that we have used the current employment land sufficiently before building more – there are lots of vacant business land that could be developed before considering new builds.
Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?
Yes: √
No:
If yes, please supply site details to identify the site:
We would ensure that we have used the current employment land sufficiently before building more – there are lots of vacant business land that could be developed before considering new builds.
(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)
Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?
Yes: □
No: □
Question 6 continued
If yes, please supply site details:
Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?
Yes: □
No: □
If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?
Yes: √
No:
If yes, please explain:
The approach of removing great chunks of the city's beautiful green spaces is an absolute crime – it would be detrimental to the health and wellbeing of residents of the city, is not environmentally friendly and is not sustainable. More creative, innovative and environmentally friendly approaches would be welcomed, and ones which make use of buildings that already exist rather than continually shoving houses in every single piece of beautiful green land.
(Please use additional box at the back of questionnaire if you need more space to comment)
About you:
Name: Enid and Tony Collins
Address:
Email:
Do you wish to be kept informed of future planning policy consultations?

(You have the right to withdraw your consent at any time by notifying us.)

Yes

No

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (FoI) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways: Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to: Forward Planning Herefordshire Council Offices Plough Lane Hereford HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Question 8 continued

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

adestron o continued

Latham, James

From: ldf

Sent: 08 October 2018 08:49 **To:** Gilson, Susannah

Subject: FW: Objection to proposal of development of Foley St/Old Eign football pitch

And another

From: Thomas Craig

Sent: 07 October 2018 14:27 **To:** ldf <ldf@herefordshire.gov.uk>

Subject: Objection to proposal of development of Foley St/Old Eign football pitch

Hi,

I'm writing to voice my objection to the proposed site of Foley St/Old Eign field being used for housing development. This is one of the few sports/recreation/dog walking spots in the area, and numerous children (including myself and 2 brothers) and families have used this field to play football since the 90s when posts were first erected following a campaign from residents of Foley Street, and also beyond long in to the 70s and 80s.

A campaign is afoot to oppose this short-sighted proposal that seeks to build on green space at a time when we should in fact be creating more of such environments. Use brown land, use anything other than this vital space.

Thomas Craig

Thomas Craig



Hereford Area Plan

Housing and Employment Site Options Consultation

Forward Planning PO Box 3146 Cardiff CF30 0EH

Tel: +44 (0)800 917 2652 Fax: +44 (0)2920 740472

E.mail: Forward.Plans@dwrcymru.com

Cynllunio Ymlaen Blwch Post 3146 Caerdydd CF30 0EH

Ffôn: +44 (0)800 917 2652 Ffacs: +44 (0)2920 740472

E.bost: Forward.Plans@dwrcymru.com

Enquiries: Rhys Evans/Ryan Norman

0800 917 2652

8th October 2018 **Sent via email**

Dear Sir/Madam,

HEREFORD AREA PLAN - HOUSING AND EMPLOYMENT SITE OPTIONS CONSULTATION

I refer to your email dated the 16th August 2018 regarding the above consultation. Welsh Water appreciates the opportunity to respond and we offer the following representation:

We understand that the Hereford Area Plan (HAP) will need to deliver approximately 3,200 dwellings (minus existing planning commitments/completions since April 2011) and that as part of the current site options consultation, the city area is split into five parts and as such our response also follows this format.

Please see Appendix 1 below for the site specific detailed comments.

We hope that the above information will assist you as you continue to progress the Hereford Area Plan. In the meantime, should you require any further information please do not hesitate to contact us at Forward.Plans@dwrcymru.com or via telephone on 0800 917 2652.

Yours faithfully.

Ryan Norman Forward Plans Officer Developer Services



Forward Planning PO Box 3146 Cardiff CF30 0EH

Tel: +44 (0)800 917 2652 Fax: +44 (0)2920 740472

E.mail: Forward.Plans@dwrcymru.com

Cynllunio Ymlaen Blwch Post 3146 Caerdydd CF30 0EH

Ffôn: +44 (0)800 917 2652 Ffacs: +44 (0)2920 740472

E.bost: Forward.Plans@dwrcymru.com

Appendix 1

Site options detail comments

- 1. The whole of the City Area is served by either Eign or Rotherwas wastewater treatment works (WwTW). There are no capacity restrictions with either of these WwTW accommodating foul-only flows at present.
- 2. The plan period extends over two of our Capital Investment Programmes (AMP7 2020-205) and (AMP8 2025-2030), therefore should reinforcement works be required for either of the two WwTWs over the plan period, an investment scheme will be considered for inclusion within these future AMP programmes.
- 3. If assets need to be laid over private land, developers can serve a requisition notice on Welsh Water to undertake the works, the cost of which can be offset by the income generated from the development over a period of 12 years, with a contribution required if the income falls short of the cost.
- 4. Where there are assets crossing the site, protection measures will be required in the form of an easement width or diversion in order to maintain the integrity of the asset and allow for access if required. This will be at the developer's cost.
- 5. Notwithstanding the site specific comments, off-site water mains / public sewers may be required to enable the proposed development sites to connect to the existing networks.
- 6. With regard to water supply, we are currently in the process of undertaking a large reinforcement scheme on our water supply network within the city of Hereford, which is due for completion by 31st March 2020.
- 7. On completion of this reinforcement scheme, there should be no issue in the water supply network serving the level of growth proposed though some local mains reinforcement may be required.
- 8. Due to the size of the public sewerage system in some areas, for the larger densities (including areas where there are clusters of development) it is unlikely that the public sewers will be able to accommodate the development, and as such a hydraulic modelling assessment of the network may be required to understand the point of connection and / or any potential improvements.
- 9. The LPA may wish to contact their Environmental Health Department for their views on whether there is the potential for odour nuisance on proposed allocations that are in close proximity to our Waste Water Treatment Works (WwTW) or Sewage Pumping Stations (SPS).
- 10. The comments are subject to change as the Area Plan progresses.



Forward Planning PO Box 3146 Cardiff CF30 0EH Cynllunio Ymlaen Blwch Post 3146 Caerdydd CF30 0EH

Ffôn: +44 (0)800 917 2652

Tel: +44 (0)800 917 2652 Fax: +44 (0)2920 740472

472 Ffacs: +44 (0)2920 740472

Site na	ime	Site ref	No of	Water supply	Sewerage
			units		
				CENTRAL	
Car	Park, Gao	l Cen08	30	There are no issues in providing this site with a	There are no problems envisaged with the public
Street	raik, Gac	Centos	30	water supply.	sewerage network in accommodating the domestic foul flows from this site.
Edgar are	Street Gri	d Cen21	300	There are no issues in providing the site with a water supply. There are numerous water mains crossing the site for which protection measures will be required in the form of easement widths or diversions.	Whilst there are no issues in the public sewerage site accommodating the domestic foul flows from these sites in isolation, due to the number and clustered nature of the proposed developments sites a hydraulic modelling assessment may be required in order to determine the extent of off-site sewers / reinforcement works required to the existing network to accommodate this site. There are numerous sewers crossing the site for which protection measures will be required in the form of
Bus Comm	Statior ercial Road	, Cen22	90	There are no issues in providing this site with a water supply.	easement widths or diversions. There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.
	Mercia Polic n, Bath Stree		25	There are no issues in providing this site with a water supply.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.

				There is a 225mm combined sewer crossing the site for which protection measures will be required in the form of an easement width or diversion.		
Hereford Fire Station, St Owen's Street Venns Close Car	Cen28 Cen30	15	There are no issues in providing this site with a water supply. There is a 3" distribution water main crossing the site for which protection measures will be required in the form of an easement width or diversion. There are no issues in providing this site with a	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site. There are no problems no problems envisaged with the		
Park, Symonds Street			water supply.	public sewerage network in accommodating the domestic foul flows from this site.		
Land adjacent to Union Walk car park	Cen31	10	There are no issues in providing this site with a water supply.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site. There is a 150mm combined sewer crossing the site for which protection measures will be required in the form of an easement width or diversion.		
			NORTH EAST			
Land north of St Francis Xavier's school	Ayl16	10	There are no issues in providing this site with a water supply.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site. There is a 150mm foul rising main crossing the site for which protection measures will be required in the form of an easement width or diversion.		
NORTH WEST						

Land at Cot Barn	Bur09	435	There will be no issues in providing this site with a water supply on completion of the network reinforcement scheme, which is due for completion by 31st March 2020.	Owing to the number of units proposed, a hydraulic modelling assessment may be required in order to determine the extent of off-site sewers / reinforcement works required to the existing network to accommodate this site. There is a 150mm foul sewer crossing the site for which protection measures will be required in the form of an easement width or diversion.
The Orchard, Lyde	Bur32	25	There will be no issues in providing this site with a water supply on completion of the	There are no problems envisaged with the public sewerage network in accommodating the domestic foul
			network reinforcement scheme, which is due for completion by 31 st March 2020.	flows from this site.
Wyevale Nurseries, Wyevale Way	Cre25	200	There will be no issues in providing this site with a water supply on completion of the network reinforcement scheme, which is due for completion by 31 st March 2020.	Owing to the number of units proposed, a hydraulic modelling assessment may be required in order to determine the extent of off-site sewers / reinforcement works required to the existing network to accommodate this site.
				There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.
Opp. Conifer Walk,	Thr19	260	There will be no issues in providing this site with a water supply on completion of the	Owing to the number of units proposed, a hydraulic modelling assessment may be required in order to
Kings Acre Road			network reinforcement scheme, which is due for completion by 31 st March 2020.	determine the extent of off-site sewers / reinforcement works required to the existing network to accommodate this site.
				There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.

West of Huntington Lane, Three Elms Road	Thr21	75	There will be no issues in providing this site with a water supply on completion of the network reinforcement scheme, which is due for completion by 31 st March 2020.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.
East of Huntington Lane, Kings Acre Road	Thr22	35	There will be no issues in providing this site with a water supply on completion of the network reinforcement scheme, which is due for completion by 31 st March 2020.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.
Land at Huntington Lane, Kings Acre Road	Thr26a	520	There will be no issues in providing this site with a water supply on completion of the network reinforcement scheme, which is due for completion by 31 st March 2020.	Owing to the number of units proposed, a hydraulic modelling assessment may be required in order to determine the extent of off-site sewers / reinforcement works required to the existing network to accommodate this site.
Hereford Racecourse, Fakenham Drive	Thr29	70	There will be no issues in providing this site with a water supply on completion of the network reinforcement scheme, which is due for completion by 31st March 2020.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site. There is a 300mm foul sewer crossing the site for which protection measures will be required in the form of an easement width or diversion.
Adj. Nelson building, Whitecross Road	Thr32	35	There will be no issues in providing this site with a water supply on completion of the network reinforcement scheme, which is due for completion by 31st March 2020.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.
Land at Faraday Road	Thr34	100	There will be no issues in providing this site with a water supply on completion of the network reinforcement scheme, which is due for completion by 31st March 2020.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.

Wyevale Garden Centre, Kings Acre Rd	Thr35	80	There will be no issues in providing this site with a water supply on completion of the network reinforcement scheme, which is due for completion by 31 st March 2020.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.
Land at Grandstand Road (north)	Thr37	15	There will be no issues in providing this site with a water supply on completion of the network reinforcement scheme, which is due for completion by 31 st March 2020. There is a 9" trunk water main and a 10" distribution water main crossing the site for which protection measures will be required in the form of easement widths or diversions.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.
			SOUTH EAST	
Wye Bridge Motors, St Martin Street	Cen29	10	There are no issues in providing the site with a water supply.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.
Land east of Ross Road	Hol12a	70	There will be no issues in providing this site with a water supply on completion of the network reinforcement scheme, which is due for completion by 31st March 2020.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.
Land east of Bullingham Lane	Hol12b	190	There will be no issues in providing this site with a water supply on completion of the network reinforcement scheme, which is due for completion by 31 st March 2020. There is a 125mm distribution water main crossing the site for which protection measures	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site. There is a 150mm foul sewer crossing the site for which protection measures will be required in the form of an easement width or diversion.

			will be required in the form of an easement width or diversion.	
Land north of Redhill Cottages, Ross Road	Stm01	125	There will be no issues in providing this site with a water supply on completion of the network reinforcement scheme, which is due for completion by 31st March 2020.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.
County Records Office, Harold Street	Tupp22	20	There are no issues in providing the site with a water supply.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.
Land adj. to Foley Trading Estate	Tup25	10	There are no issues in providing the site with a water supply.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.
Land NW of Queenswood Drive	Tup26	20	There are no issues in providing the site with a water supply.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.
Land at the Paddock, Hampton Dene Road	Tup27	20	There are no issues in providing the site with a water supply.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.
			SOUTH WEST	
Former Belmont Golf Course, Ruckhall Lane	Bel08	50	There are no issues in providing the site with a water supply.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.

Land at Argyll Rise	Bel14	20	There are no issues in providing the site with a water supply. There is a 100mm distribution water main crossing the site for which protection measures will be required in the form of an easement width or diversion.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site. There is a 225mm foul sewer crossing the site for which protection measures will be required in the form of an easement width or diversion.
Land at Grafton Lane	Hol13	155	There are no issues in providing the site with a water supply. There is a 500mm trunk water main and a 90mm distribution water main crossing the site for which protection measures will be required in the form of easement widths or diversions.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.
Land at Grafton Haulage, Ross Road	Hol14	25	There are no issues in providing the site with a water supply.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.
Land opposite Leys Farm, Grafton Lane	Stm05	65	There are no issues in providing the site with a water supply. There is a 500mm trunk water main crossing the site for which protection measures will be required in the form of an easement width or diversion.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.
Land to r/o Grafton House, Grafton Lane	Stm17	50	There are no issues in providing the site with a water supply.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.

Former health authority office, Eign Street	Stn05	25	There are no issues in providing the site with a water supply.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.
Former bus depot, Friar Street	Stn21	35	There are no issues in providing the site with a water supply.	There are no problems envisaged with the public sewerage network in accommodating the domestic foul flows from this site.
Land north of Lower Hill Farm	Thr23	420	There will be no issues in providing this site with a water supply on completion of the network reinforcement scheme, which is due for completion by 31st March 2020. There is a 500mm trunk water main, a 12" trunk water main and a 160mm distribution water main crossing the site for which protection measures will be required in the form of easement widths or diversions.	Owing to the number of units proposed, a hydraulic modelling assessment may be required in order to determine the extent of off-site sewers / reinforcement works required to the existing network to accommodate this site.
			EMPOYMENT SITES	
Land at Livestock Market	ES1	28.08 ha	Although there ought to be no issues in providing this site with a clean water supply on completion of the network reinforcement scheme, which is due for completion by 31 st March 2020, we would need to know the end use before we could provide definitive comments.	Although there would appear to be no issues with the public sewerage network in accommodating the foul only flows from this proposed development site, we would need to know the end use before we could provide definitive comments. Should any proposal require to discharge trade effluent into the public sewer then the Consent of the statutory sewerage undertaker is required (Section 118 Water Industry Act 1991). Additionally, dependant on the processes involved, an element of pre-treatment may also be required.

Land at Grafton Lane	ES3 36.26 ha	Although there ought to be no issues in providing this site with a clean water supply on completion of the network reinforcement scheme, which is due for completion by 31st March 2020, we would need to know the end use before we could provide definitive comments. There is a 90mm distribution water main and a 500mm trunk water main crossing the site for which protection measures will be required in the form of easement widths or diversions.	Although there would appear to be no issues with the public sewerage network in accommodating the foul only flows from this proposed development site, we would need to know the end use before we could provide definitive comments. Should any proposal require to discharge trade effluent into the public sewer then the Consent of the statutory sewerage undertaker is required (Section 118 Water Industry Act 1991). Additionally, dependant on the processes involved, an element of pre-treatment may also be required.
Land east of Ross Road	ES4 36.26 ha	Although there ought to be no issues in providing this site with a clean water supply on completion of the network reinforcement scheme, which is due for completion by 31st March 2020, we would need to know the end use before we could provide definitive comments. There is a 125mm distribution water main and a 50mm distribution water main crossing the site for which protection measures will be required in the form of easement widths or diversions.	Although there would appear to be no issues with the public sewerage network in accommodating the foul only flows from this proposed development site, we would need to know the end use before we could provide definitive comments. Should any proposal require to discharge trade effluent into the public sewer then the Consent of the statutory sewerage undertaker is required (Section 118 Water Industry Act 1991). Additionally, dependant on the processes involved, an element of pre-treatment may also be required. There is a 150mm foul sewer crossing the site for which protection measures will be required in the form of an easement width or diversion.
Land north of Roman Road	ES5 9.84 ha	Although there ought to be no issues in providing this site with a clean water supply on completion of the network reinforcement scheme, which is due for completion by 31st	Although there would appear to be no issues with the public sewerage network in accommodating the foul only flows from this proposed development site, we would

			March 2020, we would need to know the end use before we could provide definitive comments.	need to know the end use before we could provide definitive comments. Should any proposal require to discharge trade effluent into the public sewer then the Consent of the statutory sewerage undertaker is required (Section 118 Water Industry Act 1991). Additionally, dependant on the processes involved, an element of pre-treatment may also be required.
EZ, Watery Lane	ES6	8.28 ha	Although there ought to be no issues in providing this site with a clean water supply on completion of the network reinforcement scheme, which is due for completion by 31st March 2020, we would need to know the end use before we could provide definitive comments.	Although there would appear to be no issues with the public sewerage network in accommodating the foul only flows from this proposed development site, we would need to know the end use before we could provide definitive comments. Should any proposal require to discharge trade effluent into the public sewer then the Consent of the statutory sewerage undertaker is required (Section 118 Water Industry Act 1991). Additionally, dependant on the processes involved, an element of pre-treatment may also be required.

Our ref: SV/2018/109876/SL-

01/IS1-L01 **Your ref:**

Date: 08 October 2018

Herefordshire Council Forward Planning Plough Lane Hereford HR4 0LE

F.A.O: Ms. Siobhan Riddle

Dear Madam

HEREFORD AREA PLAN - HOUSING AND EMPLOYMENT SITE OPTIONS

Thank you for consulting the Environment Agency on the Hereford Area Plan (HAP). We have reviewed the submitted Site Options document and would offer the following comments at this time.

As part of the adopted Herefordshire Council Core Strategy updates were made to both the Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS). This evidence base ensured that the proposed development in Hereford City, and other strategic sites (Market Towns), was viable and achievable. However to support forthcoming strategic submissions, such as the HAP, a robust evidence base will be required to ensure development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period.

Similar to our recommendations on previous plans, we would advise that sites are assessed using relevant environmental constraints. For example, flood risk, SPZ (groundwater risk), landfill sites. Our latest datasets are available from our datashare website at https://data.gov.uk/publisher/environment-agency

It is noted that the submitted documents detail potential housing and employment sites within the City and assess their suitability based upon a number of constraints. Whilst we recognise the work undertaken it should be noted that this assessment is not supported by an up to date Strategic Flood Risk Assessment (SFRA) or Water Cycle Study (WCS) so the impacts are not fully understood. As such we are not in a position to comment on the suitability of the sites until such a time that the necessary supporting evidence base is provided.

Environment Agency
Hafren House, Welshpool Road, Shelton, Shropshire, Shrewsbury, SY3 8BB.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
Cont/d..

In the absence of a robust evidence base the allocations are currently not fully justified, effective or consistent with National Planning Policy and it is unclear whether they are deliverable. https://www.gov.uk/guidance/plan-making#evidence-base

Specifically, to help inform your options and ensure a sound plan, as advised previously, your Council's Strategic Flood Risk Assessment (SFRA) will need to be updated to reflect the latest climate change allowances. We have recently updated our Strategic Flood Risk Assessment guidance on gov.uk at: https://www.gov.uk/guidance/local-planning-authorities-strategic-flood-risk-assessment

Our local area climate change guidance is attached.

The SFRA update should be used to assess and justify your options. It should help ensure that any sites, particularly those associated with higher levels of growth, are sequentially tested so that they are demonstrated to be located in areas of lowest flood risk - preferably Flood Zone 1 and outside of the 1% climate change floodplain. We therefore support options for land allocation outside of areas of high flood risk.

From discussions with both Kevin Singleton and your own Lead Local Flood Authority (LLFA) it is understood that a Level 1 SFRA is due for completion shortly. We have agreed to review the document under our Cost Recovery Service and will provide comment when we receive the report. There is also significant flood modelling work being undertaken for the City which should help provide a detailed indication of flood risk for the area and, consequently, the appropriateness and deliverability of the allocated sites, particularly the ESG redevelopment (Cen21). We note that this point is picked up in the submitted information with confirmation that "A detailed Flood Study is being carried out to assess the flood risk tor all sites with Hereford and this will assist in guiding the location of new development".

As you are aware the Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with your drainage team as the LLFA.

Similar to the above we would expect to see an updated WCS which will inform wastewater infrastructure delivery, water resources and water efficiency requirements. The evidence base should assess the quality and capacity of infrastructure, and its ability to meet forecast demands. Where deficiencies are identified, policies should set out how those deficiencies will be addressed. In this instance the WCS should assess the levels of growth proposed and the impact of such growth upon the City's water treatment works. This should consider the potential impact upon the River Wye (SAC/SSSI) which bisects the HAP area. We would be able to offer waste water updates to inform the WCS subject to our Cost Recovery Service as detailed below.

Groundwater: We welcome reference to the presence, and significant constraint, of a Source Protection Zone (SPZ) in the area of sites Thr21 and Thr22. Both sites fall partially with SPZ1 and may impact the viability of these two allocations. We would be happy to discuss groundwater matters in relation to these two sites and those allocations adjacent (Htr23, Thr26 and Thr28).

Meeting and/or detailed document (e.g. evidence base or policy) review We would be happy to discuss key issues, assessments etc necessary to inform the appropriateness and deliverability of specific sites, including those identified above, along with opportunities for environmental enhancement. As you are aware, detailed review of documents and/or meetings with us to discuss strategic development

Cont/d.. 2

sites/major development locations will likely be subject to our cost recovery service. Please contact us at SHWGPlanning@environment-agency.gov.uk. Please contact me for further details.

In the absence of a SFRA or WCS update we cannot make any detailed further comments at this stage.

I trust the above is of assistance at this time. Please can you also copy in any future correspondence to my team email address at SHWGPlanning@environment-agency.gov.uk

Yours faithfully

Mr. Graeme Irwin Senior Planning Advisor Direct dial: 02030 251624

Direct e-mail: graeme.irwin@environment-agency.gov.uk

End 3



Climate Change allowances for planning (SHWG area)

March 2016 (updated Feb 2018)

Environment

The National Planning Practice Guidance refers to Environment Agency guidance on considering climate change in planning decisions which is available online: https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances

This has been updated and replaces the September 2013 guidance.

It should be used to help planners, developers and advisors implement the National Planning Policy Framework (NPPF)'s policies and practice guidance on flood risk. It will help inform Flood Risk Assessments (FRA's) for planning applications, local plans, neighbourhood plans and other projects.

Fluvial flooding - peak river flows

Table 1 of the guidance advises that an allowance should be added to 'peak river flows' to account for 'climate change' which should be specific to a river basin district catchment.

In Shropshire, Herefordshire, Worcestershire and Gloucestershire area, we would refer you to the relevant extract from Table 1 below. This outlines the 'peak river flows' within the 'Severn River Basin District', and specifies the range of percentage allowances to reflect individual development's lifetime and vulnerability. For example, residential would be 100 years (so 2070-2115).

Table 1 Extract

Severn Peak River Flows: Total potential change anticipated	2015-39	2040-2069 (less vulnerable)	2070-2115 (more vulnerable)
Upper end	25%	40%	70%
Higher central	15%	25%	35%
Central	10%	20%	25%

Sea Level rise allowances

Table 3 of the guidance (extract below) indicates that net sea level risk remains unchanged from the 2013 version.

Area of England	1990 - 2025	2026 - 2050	2051 - 2080		Cumulative (1990 - 2115)
South West	3.5mm p/a	8mm p/a	11.5mm p/a	14.5mm p/a	1.14m

Flood Risk Assessment considerations:

The design flood (1% flood level fluvial, or 0.5% tidal, plus climate change allowance) should be used to inform the sequential test, including appropriate location of built development; consideration of flood risk impacts, mitigation/enhancement and ensure 'safe' development.

Vulnerability classification

- Development classed as 'Essential Infrastructure' (as defined within Table 2 Flood Risk Vulnerability Classification, Paragraph: 066 Reference ID: 7-066-20140306 of the NPPG) should be designed to the 'upper end' climate change allowance (70%).
- For highly vulnerable or more vulnerable development e.g. housing, the FRA should use the 'higher central' climate change allowance (35%), as a minimum, to inform built in resilience; but aim to incorporate managed adaptive approaches/measures for the 'upper end' allowance (70%) where feasible.
- For water compatible or less vulnerable development e.g. commercial, the FRA should use the 'central' climate change allowance (20%), as a minimum, to inform built in resilience; but aim to incorporate managed adaptive approaches/measures for the 'higher central' allowance (25%) where feasible.

Modelling approach

Major Development:

For 'major' development (as defined within The Town and Country Planning Development Management Procedure (England) Order 2015)*, see definition note below, we would expect a detailed FRA to provide an appropriate assessment (hydraulic model) of the 1% with relevant climate change ranges.

There are two options:

- Scenario 1 Produce a model and incorporate relevant climate change allowances in Table 1.
- Scenario 2 Re-run an existing model and incorporate relevant climate change allowances in Table 1.
- Non Major Development:

For 'non major' development, we would advise that a model is produced or existing model is re-run, similar to the above approach (Scenario 1 and 2). This would give a greater degree of certainty on the design flood extent to inform a safe development.

However, for 'non major' development only, in the absence of modelled climate change information it may be reasonable to utilise an alternative approach. To assist applicants and Local Planning Authorities we have provided some 'nominal' climate change allowances within the 'Table of nominal allowances' below. These should be considered as appropriate within any FRA. There are three additional options:

Scenario 3 - Where previous modelled data (for a variety of return periods) is available, you could interpolate your own climate change figure (see note iv below).

Scenario 4 - Where the 1% level is available from an existing model add on the relevant 'nominal climate change allowance' provided in the 'Table of nominal allowances' below.

Scenario 5 - Establish the 1% level, for example using topographical levels (including LiDAR) and assessment of watercourse flow and nature and then add on the relevant 'nominal climate change allowances' provided in the 'Table of nominal allowances' below.

*Note: For definitions of 'major' development see 'Interpretation 2.—(1)', on page 5, at www.legislation.gov.uk/uksi/2015/595/pdfs/uksi 20150595 en.pdf

Table of Nominal Allowances

Watercourse	20% - 25%	35% - 40%	70%
Upper Severn			
River Wye	600mm	850mm	1500mm
River Teme			
River Avon	400mm	600mm	1000mm
Lower Severn	400mm	600mm	1000mm
Tributaries and 'ordinary watercourses'	200mm	300mm	500mm

Notes to above:-

(i) Watercourse definition:

The "Upper Severn"/"Lower Severn" boundary is taken as Lincomb Weir, Worcestershire (national grid reference SO8196869458).

An 'Ordinary Watercourse' is a watercourse that does not form part of a main river. Main Rivers are indicated on our Flood Map. You can also check the classification of the watercourse with the LLFA, some of which have produced Drainage and Flooding Interactive Maps.

- (ii) Where a site is near the confluence of two, or more, watercourses, the FRA should use the larger river climate change allowances.
- (iii) We may hold more precise information for some of the "tributaries". We would recommend that you seek this information from us via a 'pre-planning enquiry/data request', to the email address below.
- (iv) We would also recommend that you contact us for our modelled '20%' allowances and associated flow data. This is available for some rivers. This data may help inform a more detailed climate change analysis (where necessary), including any interpolation of levels or flow to create a 'stage discharge rating' in order to estimate the required percentage; or be of assistance to inform 'less vulnerable' or 'water compatible' development proposals.

IMPORTANT NOTE

Please note the nominal climate change allowances are provided as a pragmatic approach, for consideration, in the absence of a modelled flood level and the applicant undertaking a detailed model of the watercourse. Use of nominal climate change allowances are not provided/ recommended as a preference to detailed modelling and historical data.

The Local Planning Authority may hold data within their Strategic Flood Risk Assessment (SFRA), or any future updates, which may help inform the above.

FREEBOARD NOTE

It is advised that Finished Floor Levels should be set no lower than '600mm' above the 1% river flood level plus climate change. Flood proofing techniques might be considered where floor levels cannot be raised (where appropriate). This 600mm freeboard takes into account any uncertainties in modelling/flood levels and wave action (or storm surge effects).

Surface Water

Table 2 of the guidance also indicates the relevant increases that surface water FRA should consider for an increase in peak rainfall intensity.

The following table is for 'peak rainfall intensity' allowance in small and urban catchments. Please note that surface water (peak rainfall intensity) climate change allowances should be discussed with the Lead Local Flood Authority (LLFA).

Peak Rainfall Intensity -	Total potential	Total potential	Total potential
Applies across all of England	change anticipated	change anticipated	change anticipated
	for 2010-2039	for 2040-2069	for 2070-2115
Upper end	10%	20%	40%
Central	5%	10%	20%

Note to above:-

For river catchments around or over 5 square kilometres, the peak river flow allowances are appropriate.

Produced by: shwgplanning@environment-agency.gov.uk

West Midlands Area -

Shropshire, Herefordshire, Worcestershire and Gloucestershire Sustainable Places Team.

Latham, James

From: ldf

Sent: 08 October 2018 11:26 **To:** Gilson, Susannah

Subject: FW: Contact us form submitted

Other reps being posted

From: Customer Resolution Team
Sent: 08 October 2018 09:26
To: ldf < ldf@herefordshire.gov.uk>
Subject: FW: Contact us form submitted

Dear team,

The attached contact us form has been received and is being forwarded for your attention.

Herefordshire Council Customer Services

Heref ordshire.gov.uk





A Please consider the environment - Do you really need to print this e-mail?

Any opinion expressed in this e-mail or any attached files are those of the individual and not necessarily those of Herefordshire Council. This e-mail and any files transmitted with it are confidential and intended solely for the use of the addressee. This communication may contain material protected by law from being passed on. If you are not the intended recipient and have received this e-mail in error, you are advised that any use, dissemination, forwarding, printing or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please contact the sender immediately and destroy all copies of it.

From: donotreply@herefordshire.gov.uk [mailto:donotreply@herefordshire.gov.uk]

Sent: 05 October 2018 17:25

To: Info (Shared Mbx)

Subject: Contact us form submitted

The contact us form has been submitted to your service area with the following details:

Caption	Value
Name	Ms D.M.Evans and Mr K.R.Kimber
Email	
Nature of enquiry	Another service
Message	Hereford Area Plan site ID Tup25. Foley Street Field. How have the residents been consulted with. How do you object to the proposals other than the mainly irrelevant foprm you have provided. You propose to

develop Foley Street's recreational park without asking the community. You put before the existing community some theoretical people. With one breath you advocate exercise, outdoors for children particularly, mental and physical health with the other you take away all green spaces, trees and wildlife. The Council put in charge to care for Hereford is spoiling it .Why? Please pass on my comments to be taken into account since I can't see how to do this otherwise.

Ref_48.



Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address: www.herefordshire.gov.uk/herefordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herefordareaplan as well as at libraries and information centres across the county.

Complete the questions for as many sites as you would like to comment on. Please include the site reference for any you are making a specific comment on.

00

<u>H</u>	ous	ing	UP	26	/	Tha	ukgo	u-Br	fo	rwardy	29	this	100
th	e m	ost suitab	le sites	gree that to to consid s about plo	the sites er for fut	that ha ture ho	ave bee using d	n ident evelopr	ified : ment	as having If there	g pot e is a	ential a	re
Y	es:									-4	OCT	2018	
N	o:									13WU;		100	
TOUT MY	his soll eld his orel ove	area sul nes are ! seus wood	Space for the de yards fers for bride	E IS ESSE whit drew whit it wo consever played More d	e traffic Justien houses	Loud Velue woul	show, les and I mea	espeer e parl u wor	ally ced i	when the work the work wow, en	poly sle c	sall leughti ngestro	isp isp
4) Sha	thu Vale	e away	the e	ity has	an ove	rempph green	space	reea s	pace	is mol	a	reason	6

No:	
If yes	, please supply site details to identify the site:
(We a	are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/herefordareaplan)
The S	Site Allocations Plan may need to also control the phasing of housing
delive	ery/development. (Please refer to the report, para 5.18).
ine t	ohases are: Short term, 0-5 years
	Medium term, 5-10 years
•	Long term, 10 + years
Ques	stion 3: Do you think any particular sites should be developed in the short, medium of term?
long Yes	
long Yes No	
long Yes No	□ □ se explain your answer:
long Yes No	

Employment Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development? Yes: No: If no, please explain: Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations? Yes: No: □ If yes, please supply site details to identify the site:

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

(We are currently running a Call for Sites - Please refer to www.herefordshire.gov.uk/herefordareaplan)

Yes: □

No: □

Question 6 continued
If yes, please supply site details:
Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?
Yes: □
No: □
(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/herefordareaplan)
Question 8: Do you have any comments on the document and the approach used to identify potential sites? Yes: □
165.
No:
If yes, please explain:
(Please use additional box at the back of questionnaire if you need more space to comment)

Abou	out you:	
Name	me: K.A EVANS	
Addr	dress:.	

Emai	ail:	
Do yo	you wish to be kept informed of future planning policy	consultations?
Yes		
No		

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (FoI) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways: Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to: Forward Planning Herefordshire Council Offices Plough Lane Hereford HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Question 8 continued		



Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address: www.herefordshire.gov.uk/herefordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herefordareaplan as well as at libraries and information centres across the county.

Complete the questions for as many sites as you would like to comment on. Please include the site reference for any you are making a specific comment on.

Housing

Question 1: Do you agree that the sites that have be	peen identified as	s having potential are
the most suitable sites to consider for future housing	g development?	If there is a specific
site you have concerns about please identify the site	e in your respons	se.

Yes:						
No:	X					

If no, please explain:

No to Tup26

The Tup26 Area with the football field is used extensively by large numbers of children and their parents and can be overwhelmed with park cars. Plus the Bishops Field are now also being used for football tournaments for children.

The Area has a unique purpose planted mature Tree Area

It's use extensively by dog walkers, walkers, joggers etc.

It's a general play area for children of the district – otherwise they will be confined to the streets and other green open areas are a long way off.

The Bishops Field will be put under unlawful use with dog walkers in particular which is a health concern apart from being use of Private land

The culvert pipe and stream leading the ground water off the football field and Tup26 Area plus Bishops Fields surcharges regularly flooding the roads and potentially the local houses as it runs under Queens Wood Drive
Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?
Yes: x
No:
If yes, please supply site details to identify the site:
Nearby the area just South West is an Apple Orchard which was supposed to house a new Rugby Football Ground and new large housing off By the junction of Hollywell Gutter Lane - Hampton Park Road
The area with Tup26 adds with along with the surrounding playing field of Bishops and the Football field plus the children's play park adds significant aesthetically to the whole community area.
(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)
(*** are sarreinly farming a same of sites - 1 lease feler to www.fierefoldsfille.gov.div[]Ar callio(sites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes x

No 🗆
Please explain your answer:
Nearby the area just South West is an Apple Orchard which was supposed to house a new Rugby Football Ground and new large housing off By the junction of Hollywell Gutter Lane - Hampton Park Road
<u>Employment</u>
Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?
Yes: □
No: x
If no, please explain:
It's a residential area with dense housing and small narrow congested estate roads
Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?
Yes:
No: X
If yes, please supply site details to identify the site:

Nearby –this is a very large a large residential area with many schools
(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)
(we are currently running a call for oftes – r lease refer to www.nerefordshire.gov.dk/riAr calliorsites)
Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?
Yes: x
No: □
NO. L
Question 6 continued
If yes, please supply site details:
Nearby the area just South West is an Apple Orchard which was supposed to house a new Rugby Football Ground and new large housing off By the junction of Hollywell Gutter Lane - Hampton Park Road
Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?
Yes: x
No: □
If yes, please supply site details to identify the site:
Nearby the area just South West is an Apple Orchard which was supposed to house a new Rugby Football Ground and new large housing off By the junction of Hollywell Gutter Lane - Hampton Park Road

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)
Question 8: Do you have any comments on the document and the approach used to identify potential sites?
Yes: □
No: □
If yes, please explain
(Please use additional box at the back of questionnaire if you need more space to comment)
About you:
Name:Owen Evans
Address
Email
Do you wish to be kept informed of future planning policy consultations?
Yes x
No 🗆
(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (FoI) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways: Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to: Forward Planning Herefordshire Council Offices Plough Lane Hereford HR4 0LE

Or by email to Idf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Question 8 continued	

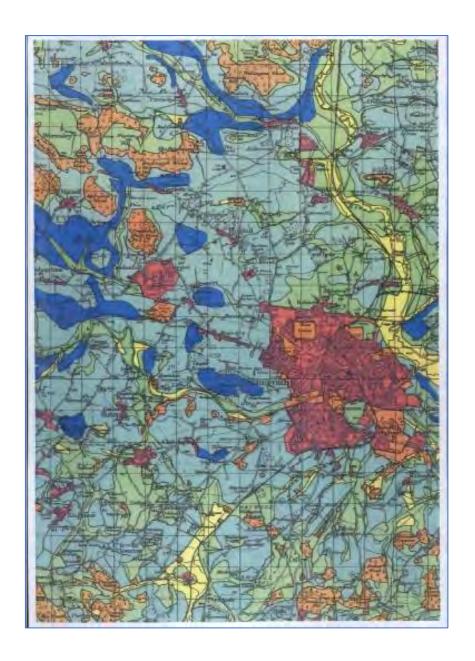
Comments on the Hereford Area Plan, September 2018

Dr. Nichola Geeson

- 1. Where is the report and analysis of the **public consultation on the Hereford Area Plan held in Spring 2017**? It would be very useful to know how Herefordians answered the questionnaire, and the priorities they listed. For example, Question 5 asked: "Should there be a boundary drawn to show where new development can happen and where it should be limited to protect the countryside?" How have the answers to these Questions been incorporated into the Plan?
- 2. The Office for National Statistics has recently issued (20 September 2018) new projections for numbers of households. The number of households in Herefordshire for 2011-2031 is now projected as 10,660, which is 35% lower than the figure of 16,500 used in the Core Strategy. See: https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland/2016based/householdprojectionsmaintables.xlsx

Therefore Herefordshire, and also the Hereford Area Plan no longer need to plan for so many new homes, and the "target" for Hereford, (currently 6,500), should be reduced accordingly.

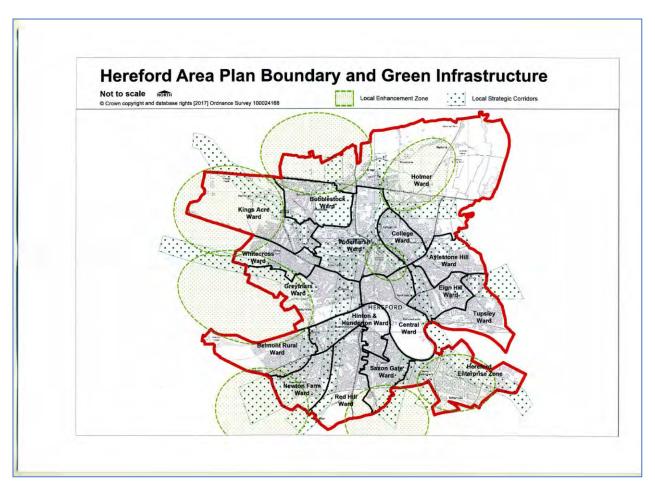
- 3. A look at Rightmove shows that **quite a lot of homes (in all price ranges) are not selling very fast in Hereford**. The date they were added to the market is listed, and also date(s) when they were reduced in price. Of course some homes will be hard to sell for good reason, but the number reduced does suggest that demand is not so great as we are led to believe.
- 4. In these current Hereford Area Plan documents, the constraints for sites are not listed in a consistent way. Some sites have a particular constraint mentioned, but a similar site may not. This means that sites are not being assessed according to accurate and consistent criteria. For example, where there are top grade agricultural soils, not all sites that would cover these soils acknowledge that fact. Sites on nationally rare Grade 1 and 2 agricultural land should be discounted, as these may be crucial to future food production, especially in these uncertain times of climate change and BREXIT.



Grade 1 agricultural land (dark blue), and Grade 2 agricultural land (light blue) are common locally but rare nationally.

5. Brownfield sites should be listed and considered first for building. The Campaign for the Protection of Rural England supports this on a national scale https://www.cpre.org.uk/resources/housing-and-planning/green-belts/item/4931-state-of-the-green-belt-2018. Greenspaces are very important for mental health as well as recreation. There is no "oversupply of amenity greenspace" in Hereford as claimed, so all greenspaces that remain should be kept. For example, it would be a travesty to lose the green space in Foley Street.

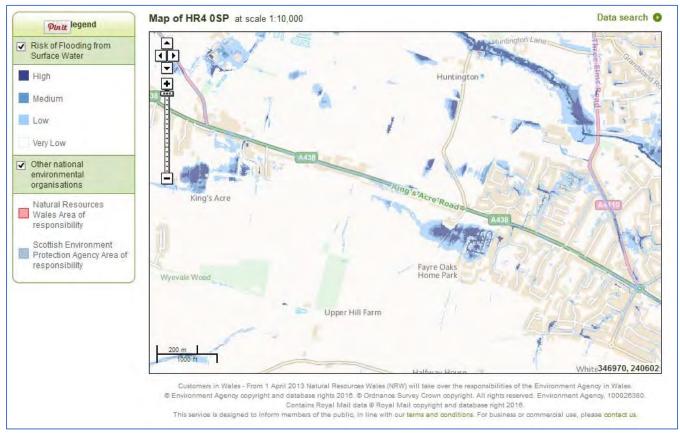
https://www.herefordtimes.com/news/16965971.children-fear-losing-green-to-potential-housing-estate/



How is this illustrative and misleading map of Green Infrastructure being used for selecting sites for the HAP in 2018?

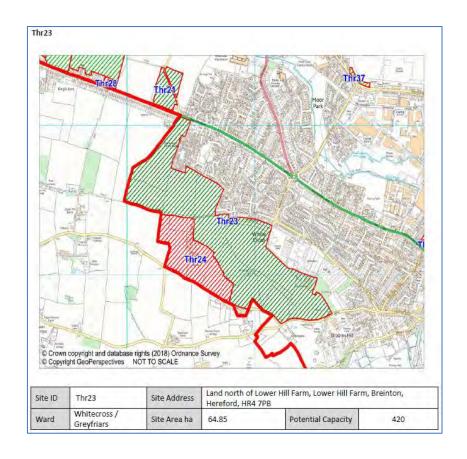
- 6. Wildlife and biodiversity have not been valued or appraised as they should be in the Hereford Area Plan. Biological data sets have not been updated in any consistent way for over 10 years. Therefore the extent of significant biological populations is unknown and has been ignored. For example, the current distributions of otters within the city, that are a protected species, (e.g. close to Foley Trading Estate) are not considered. Hereford is on the banks of the River Wye Special Area of Conservation and SSSI. This means that an up-to-date Habitats Regulations Assessment is necessary. "In accordance with the Habitats Regulations, all competent authorities, including Natural England, must undertake a formal assessment of the implications of any new plans or projects that may be capable of affecting the designated interest features of European Sites before deciding whether to undertake, permit or authorise such a plan or project." See: file:///C:/Users/nicky/Downloads/NESTND026%20v2%20(1).pdf Biological surveys should be carried out as part of a strategic evaluation before the suitability of sites for development is assessed.
- 7. In the NPPF (2018) para 58, **Neighbourhood Plans** are guided to: "develop robust and comprehensive policies that set out the quality of development that will be expected for the area" including to "optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support

- *local facilities and transport networks;*". Therefore, for Hereford city this guidance from the NPPF must also be applied in a consistent, overall, strategic manner, not on a simple case by case basis as presented in the HAP documents.
- 8. Maps of **flood risk from both groundwater and surface water** should be used to discount sites more strictly. It is not prudent simply to hope that flooding might not occur. The more the ground is "sealed" by development, the less the area for surface water to be absorbed, and the greater the new flood risk, and the flood risk within existing developments. These maps show the obvious areas to avoid for future development.



An example of surface water flood risk in west Hereford. Site Thr 23 should be discounted on this basis, as the access road to the whole development would be across this

An example, Site Thr 23 includes an area close to Kings Acre Road which is subject to surface water flooding on an annual basis.

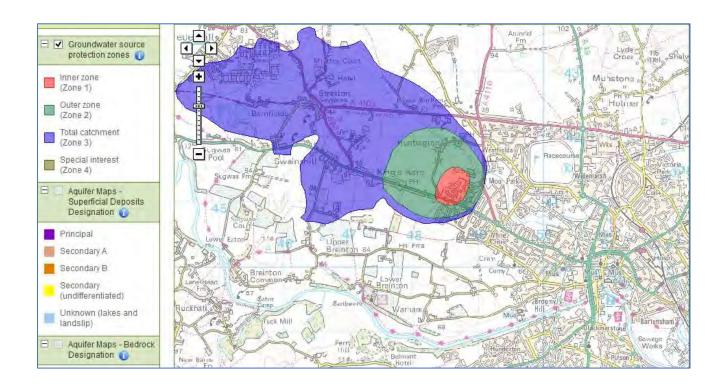


In spring 2018 the attenuation pond that had been dug in 2017 besides Fayre Oaks Home Park was overtopped over 6 weeks or more. Surely this field, part of Thr23 should be discounted as a potential housing site?



Surface water flooding and overtopping of attenuation pond by Fayre Oaks Home Park, April 2018

9. In addition, the **Environment Agency's groundwater protection zones** should be recognised as a constraint to development. Water quantity and quality is crucial for the water removed from designated boreholes for industrial premises such as Heineken and Cargill/Avara.



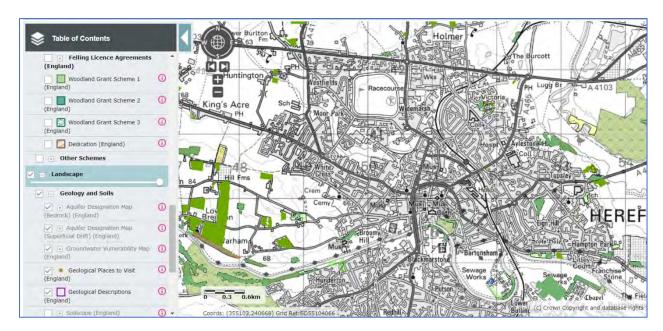
10. **Surface geology and bedrock geology**. This surface geology map used to support the choice of the red route for the "bypass" is very misleading. It includes only selected fields as Grade 1 agricultural land (blue-crossed) corresponding to Site Thr23 (see point 7.) Thr21 and part of the Three Elms Strategic Urban Extension. The actual extent of top grade soils is much more widespread (see point 4. above). Note that the red route is conveniently placed outside Site Thr23.



The **surface geology** around Hereford is very complex because it developed at the edge of an extensive ice sheet, melting after the last Ice Age. Huge volumes of meltwater carved rapidly changing channels, according to changing ice and rock barriers. The original River Wye was where Yazor Brook is now, but was diverted south, through Breinton Gorge. Yazor Brook remains within a wide and complex active floodplain of sands, gravels and clays. Flow of water through this can be unpredictable without intensive, localised survey, and therefore the risk of building on this floodplain, (for the Three Elms SUE and new sites identified in the HAP) is much greater than it appears.

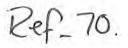
The **bedrock geology** includes relatively soft and porous mudstones, that allow water flow through them but at variable rates. This means that surface water flow may sometimes be augmented by water from much deeper below.

11. **Conclusion**: more local research and survey is required before sites put forward in the Hereford Area Plan can be appraised adequately and consistently. There are a number of sites put forward in HAP documents that should have already been discounted, with regard to the factors outlined above. Map overlays of agricultural land quality, surface water flood risk, water protections zones, etc. should be placed over the maps of proposed sites to advise which should be discounted. Natural England's MAGIC maps https://magic.defra.gov.uk/ will also provide some additional information for assessment.



From Natural England's MAGIC maps https://magic.defra.gov.uk/ showing e.g. woodland and traditional orchards







Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address: www.herefordshire.gov.uk/herefordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herefordareaplan as well as at libraries and information centres across the county.

Complete the questions for as many sites as you would like to comment on. Please include the site reference for any you are making a specific comment on.

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:	
No:	卤

If no, please explain:	site I Land adjacent to
The sife 1	D TUP 25 address Found adjacent to
200 - 211 1100	hold the many maker MK
beautiful plane to	es with variegated leaves - 2 goal posts children pleying football - all ogs of dilon two plant he year. Dog walkes also use he ver a golfer uses to improve his stills - I value it as a place of quiet refreet.
are well vied by	childer playing football - all of s of allow
radults do his	or assessed to more his stills - 1
cura - ama e	Value it as a place of quet retreet -

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?
Yes:
No: X
If yes, please supply site details to identify the site:
(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)
The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18). The phases are: Short term, 0-5 years Medium term, 5-10 years Long term, 10 + years
Question 3: Do you think any particular sites should be developed in the short, medium or long term?
Yes
No 💢
Please explain your answer:

Employment

	stion 4: Do you agree that the sites that nost suitable sites to consider for future e	have been identified as having potential are employment land development?
Yes:		
No:	×	
lf no,	please explain:	
	be considered as future employment al	re suitable sites not shown on the plan that llocations?
No:		
If yes	s, please supply site details to identify the the School site used At allege on Bath Welked Kee this	e site: I by Comil until recoul. Street Mereford. Is brilding lying empty
(We a	are currently running a Call for Sites – Please re	fer to www.herefordshire.gov.uk/HAPcallforsites)
for us		dered in the site options that could be suitables university educational buildings, student or other commercial activities?
Yes:	A	HERCHORD OF BEHWALK
No:		O D OCT 2:3
		To

Question 6	continued
If yes, pleas	e supply site details:
	Overious Archives Brildings
	on plansed St. place pool.
5	
	Kirchard Ene Koental
	previous Archives Brildings on learned 8t. Here tool. 8 Kircford Eye Koepital on Egn Rd.
	on The La.
	Do you think there are other more suitable sites not shown on the plan that
could be cor	nsidered for other uses as set out in question 6 above?
Yes: □	
1	
No: D	
A41	
(We are currer	ntly running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)
	Do you have any comments on the document and the approach used to
identify pote	ntial sites?
Yes: 'Q	
/	
No: □	
If yes, pleas	
\mathcal{T}	y which would be developed without
0 4/	1 and to developed without
luft	y what come se
	() 1
ani.	existing green spaces in she Culti

(Please use additional box at the back of questionnaire if you need more space to comment)

About you:	
Name: SUSANNAGRUNSEUL	
Address	
444444444	
Email:	
Do you wish to be kept informed of future planning policy consultations?	
Yes 🛇	
No 🗆	
(You have the right to withdraw your consent at any time by notifying us.)	

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (Fol) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways: Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to: Forward Planning Herefordshire Council Offices Plough Lane Hereford HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.



Question 8 continued	
Contract to a Contract Contract	
	1.10



Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address: www.herefordshire.gov.uk/herefordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herefordareaplan as well as at libraries and information centres across the county.

Complete the questions for as many sites as you would like to comment on. Please include the site reference for any you are making a specific comment on.

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific

Housing

site you have concerns about please identify the site in your response.
Yes: □
No: □
If no, please explain:

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?
Yes: □
No: □
If yes, please supply site details to identify the site:
(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)
The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18). The phases are: Short term, 0-5 years Medium term, 5-10 years Long term, 10 + years Question 3: Do you think any particular sites should be developed in the short, medium or long term? Yes
Please explain your answer:

Employment

	the most suitable sites to consider for future employment land development?		
	Yes:		
	No: □		
Ī	If no, please explain:		
	Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?		
	Yes: □		
	No: □		
Ī	If yes, please supply site details to identify the site:		
L	(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)		
Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?			
	Yes: □		
	No: □		

Question 6 continued...

If yes, please supply site details:		
Question 7: Do you think there are other more suitable sites not shown on the plan that		
could be considered for other uses as set out in question 6 above?		
Yes: □		
No: □		
If yes, please supply site details to identify the site:		
(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)		
Question 8: Do you have any comments on the document and the approach used to		
identify potential sites?		
Yes: √		
No: □		
NO. L		
The Herefordshire and Worcestershire Earth Heritage Trust (EHT) is a charity that aims to		
record, protect and promote geology and landscape in the two counties. We identify and		

monitor Local Sites of geological interest so as to be able to advise the County Councils on any plans that may impinge upon them.

The site options identified for development in the HAP include no known sites of geological interest, but we are interested in extending our understanding of the rock formations on which Hereford is built. These include glacial till and glaciofluvial deposits from the last ice age as well as river terraces and alluvium.

Hence we raise no objections to the HAP, but have an ongoing desire to make use of opportunities to record our geological heritage, with the permission of developers, when excavation makes rocks accessible.

(Please use additional box at the back of questionnaire if you need more space to comment)

Ab	out	you:

Name: Kay Hughes, EHT Trustee

Address: Herefordshire and Worcestershire Earth Heritage Trust

Geological Records Centre, University of Worcester

Henwick Grove, Worcester, WR2 6AJ

Email: k.hughes2@worc.ac.uk

Do you wish to be kept informed of future planning policy consultations?

Yes 1

No □

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (FoI) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways: Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to: Forward Planning Herefordshire Council Offices Plough Lane Hereford HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Question 8 continued	

Latham, James

From: ldf

 Sent:
 03 October 2018 09:07

 To:
 Gilson, Susannah

Subject: FW: Tup 27 Potential Area for Development

Follow Up Flag: Follow up Flag Status: Flagged

Another rep attached

From: Steve Harrison

Sent: 02 October 2018 22:19 **To:** ldf <ldf@herefordshire.gov.uk>

Subject: Tup 27 Potential Area for Development

Dear Sir/Madam

I am disappointed to hear that the land behind my property at REDACTED ADDRESS, known as The Paddock (Tup 27) is being considered as a potential site for housing development.

I am very concerned how this potential development could impact on the area. Housing at the Bishop's Fields development, new housing south of Holly well Gutter Lane and a new development off Gorsty Lane (backing onto The Paddock) are not shown on the current area map and this needs to be brought to your attention so that any analysis includes these new sites as well.

A further development would have a massive impact on the area and the community. The green space that The Paddock provides should be protected for current users and future ones, which include dog walkers and residents and their families to enjoy. The area provides a sanctuary for a range of wildlife; squirrels, deer, foxes and birds including woodpeckers all inhabit this semi natural space which is in short supply in this neighbourhood.

My other major concern is access onto Hampton Dene road. Although your proposal states that your Highways department have no major concerns, The Paddock is close to 3 schools. At drop off and pick up points in the school day Hampton Dene Road, Church Road and Gorsty Lane are extremely busy and dangerous due to the volume of traffic, the number of parents and children on foot and the amount of parked cars. This can also be a problem at different times of the day and week when the schools hold social events and parent's evenings. The area is not safe at these times and a further development would only cause further congestion and compromise safety as well.

I urge you to listen to the views of current residents and the community as whole and keep this site as a green space for residents to enjoy.

Yours faithfully

Stephen Harrison



Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address: www.herefordshire.gov.uk/herefordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herefordareaplan as well as at libraries and information centres across the county.

Complete the questions for as many sites as you would like to comment on. Please include the site reference for any you are making a specific comment on.

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No: 1

If no, please explain:

Using Tup 26 and Tup 27 for housing would place further pressure on the road and parking system of the local area – the 3 schools in Tupsley and local doctor's surgery already struggle with the sheer amount of cars and the road network just cannot support further increases in traffic. We already have the large Bishop Field estate less than 150 metres from Tup 27 which has impacted on the road and services network and will continue to do so.

In particular for Tup 26 – Queenswood Drive is a narrow road and cannot support further traffic that 20 houses would bring. There are already cars parked along it on a regular basis and when the sports field is being used for regular football training and weekly matches then the traffic and car parking pressure is already at maximum. Increased housing and therefore further traffic and parking would make the situation utterly unsustainable.

If Tup 26 and Tup 27 were used for housing then that would mean basically removing all green space to the local area as we would only be left with the community sports playing field. The document states that any removal and loss of green space would be "compensated" but that is not possible as there are no other green spaces available. The mature green space at Tup 26 is both beautiful and essential for the health and wellbeing of residents and it is important that we ensure we protect our local wildlife too.

I am not a dog owner myself, but it is clear to me that the green spaces that exist are not enough for the sheer numbers of dogs in our local area. We already have a problem with dog excrement – I dread to think what it will be like if green spaces like Tup 26 and Tup 27 are removed.

Tup 26 also has a small stream on its border which floods significantly and already affects housing nearby – it renders this space unsuitable for building on.

I also believe that Tup 26 was gifted to the community as recreational land and not to be used for building on. There may be abundance of green spaces in Hereford but that forms part of its beauty and does not mean that they should be destroyed – we should be adapting vacant buildings (of which there are many around the city) before building more.

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes: √

No:

If yes, please supply site details to identify the site:

Adapt vacant buildings around the city rather than continually building afresh especially when it is at the detriment of the city's beautiful green spaces.

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No 1

Please explain your answer:

I believe Tup 26 and Tup 27 should be removed from the plan completely. More creative use of existing buildings should be planned for rather than removing green spaces.

Employment

the most suitable sites to consider for future employment land development?
Yes:
No: √
If no, please explain:
I would ensure that we have used the current employment land sufficiently before building more – there are lots of vacant business land that could be developed before considering new builds.
Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?
Yes: √
No:
If yes, please supply site details to identify the site:
I would ensure that we have used the current employment land sufficiently before building more – there are lots of vacant business land that could be developed before considering new builds.
(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)
Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?
Yes: □
No: □
Question 6 continued
If yes, please supply site details:
Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?
Yes: □
No: □
If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Yes: √
No:
If yes, please explain:
The approach of removing great chunks of the city's beautiful green spaces is an absolute crime – it would be detrimental to the health and wellbeing of residents of the city, is not environmentally friendly and is not sustainable. More creative, innovative and environmentally friendly approaches would be welcomed, and ones which make use of buildings that already exist rather than continually shoving houses in every single piece of beautiful green land.
(Please use additional box at the back of questionnaire if you need more space to comment)
About you:
Name: Elise Hasler
Address:
Email:
Do you wish to be kept informed of future planning policy consultations?
Yes √
No
(You have the right to withdraw your consent at any time by notifying us.)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (FoI) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways: Email: Idf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to: Forward Planning Herefordshire Council Offices Plough Lane Hereford HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Question 8 continued

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

question o continued

Latham, James

From: ldf

 Sent:
 09 October 2018 08:48

 To:
 Gilson, Susannah

Subject: FW: Here for Hereford Response to HAP Housing and Employment Site Options

Consultation

Another – this makes no reference to the site options consultation.

From: Victoria Wegg-Prosser
Sent: 08 October 2018 22:34
To: ldf < ldf@herefordshire.gov.uk>

Subject: Here for Hereford Response to HAP Housing and Employment Site Options Consultation

Submitted by email from Honorary Secretary, Victoria Wegg-Prosser Address: ADDRESS REDACTED

Preamble: Here for Hereford is a non-political environmentalist local residents group holding the Council to account and providing a forum for debate. Follow us on Facebook and Twitter.

<u>Timetable</u> for the Hereford Area Plan – object to delays to this timetable

Here for Hereford appreciates that the current consultation is only concerned with Site Options, but cannot pass this opportunity by without referencing again the above objection. Originally the Hereford Area Plan was to have been adopted in 2018; this was delayed and a Preferred Options Public Consultation took place in Winter 2017/Spring 2018. The results of the Issues and Options consultation have been published but they have been superseded by further consultations on the Hereford Transport Package. Here for Hereford considers that both City Council and County Council have treated the urgency with which a Hereford Area Plan is required with disdain. The Inspector relied on the Hereford Area Plan in her consideration of the Local Plan Core Strategy as being a meaningful DPD which would be taken into account in terms of the Local Plan Core Strategy, and it appears now that this is not the case.

Hereford railway station - object to delay in provision of transport hub – defeatist attitude

Here for Hereford draws attention to the way in which both City and County Council seem to have no regard for the physical environment of this grade 2 listed building at the very time the City is about to welcome students to its new University. The Hereford Area Plan should have been in place in time for a champion to take up the cause of developing a transport hub of which the City could be proud. Instead, cost over-runs on the City Link Road have resulted in a scaled-down design for the transport hub, yet to go beyond the preliminary drafting stage. The former head of Herefordshire Council, Cllr Tony Johnson is quoted in Hereford Times (4/10/18, p.14) as saying that the new GP surgery next to the station 'may not be the most attractive building in the world but then people don't come to Hereford because it's the most attractive city either'.

Sustainability Appraisal – object to scope of this document and failure to advertise it more widely

Because the SA covers the entire area of Herefordshire, the examination of historic assets within the HAP boundary lacks detailed scrutiny. It is as if Councillor Johnson's comment was common parlance with LUC (August 2018) who wrote the SA for Herefordshire Council.

A better SA would have commenced with Table 4.1 (Summary of the SA scores for the Residential Areas) and provided commentary on these. There should also have been a proper recognition of Policy MM031 in the Local Plan which states:

"Sections of the River Wye SAC where the water quality targets are already exceeded will be subject to measures to reduce nutrients in line with the targets. All new development proposals must not compromise the ability of the Nutrient Management Plan to deliver the necessary overall reductions along these stretches."

A further omission is an acknowledgement of the situation regarding the Minerals and Waste Local Plan, on which Issues and Options were considered in the late summer of 2017, and nothing has come to fruition since then.

The SA is not mentioned in the Questionnaire accompanying the Site Options documents.

It would appear the first fifty pages of the SA have been written as part of the pending SA on the HAP itself, and no-one overseeing the document at Herefordshire Council picked up on this. Oversight of consultants' work for the Council is imperative if public assurance is to be given that tax payers' money on this type of work has been well spent.

Please acknowledge receipt of this Response - thank you.



Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address: www.herefordshire.gov.uk/herefordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herefordareaplan as well as at libraries and information centres across the county.

Complete the questions for as many sites as you would like to comment on. Please include the site reference for any you are making a specific comment on.

Question 1: Do you agree that the sites that have been identified as having potential are

Housing

the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.		
Yes: □		
No: □		
If no, please explain:		
N/A		

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?	
Yes: □	
No: □	
If yes, please supply site details to identify the site:	
N/A	
(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)	
The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18). The phases are: Short term, 0-5 years Medium term, 5-10 years Long term, 10 + years	
Question 3: Do you think any particular sites should be developed in the short, medium or long term?	
Yes □	
No 🗆	
Please explain your answer:	
N/A	

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?
Yes: □x
No: □
If no, please explain:
Agree with the inclusion of ES6 Land at Rotherwas. The site is within the current Hereford Enterprise Zone (HEZ) boundary. As well as greenfield arable land, it also comprises of brownfield former breakers yard and small employment site with temporary planning permission for workshop units.
The success of the HEZ has demonstrated high demand for employment land in the Rotherwas area. At current counting the Enterprise Zone has now sold or developed 41 acres of land, totalling 46,000 sqm of new floorspace, much of this to local Herefordshire companies needing space to expand, with a future 11 potential sales in the pipeline. Inclusion of this site as employment land is essential if the HEZ is to reach its full potential.
Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?
Yes: □X
No: □
If yes, please supply site details to identify the site:
The Enterprise Zone is currently preparing a proposition for expansion of the Local Development Order boundary of the HEZ to include approximately 10.72 hectares of empty brownfield and undeveloped land adjoining the eastern boundary of the estate (plan attached) within 3 rd party private ownership. Expansion of the HEZ is seen as necessary to meet the pipeline of demand. As such we would recommend that this section of land be considered as an addition to ES6 Land at Rotherwas.
(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?	
Yes:	
No: □	
Question 6 continued	
If yes, please supply site details:	
Question 7: Do you think there are other more suitable sites not shown on the plan that	
could be considered for other uses as set out in question 6 above?	
could be considered for other uses as set out in question 6 above?	
could be considered for other uses as set out in question 6 above? Yes: □	
could be considered for other uses as set out in question 6 above? Yes: □ No: □	
could be considered for other uses as set out in question 6 above? Yes: □ No: □	
could be considered for other uses as set out in question 6 above? Yes: □ No: □	
could be considered for other uses as set out in question 6 above? Yes: □ No: □	
could be considered for other uses as set out in question 6 above? Yes: □ No: □	
could be considered for other uses as set out in question 6 above? Yes: No: If yes, please supply site details to identify the site:	
could be considered for other uses as set out in question 6 above? Yes: □ No: □	
could be considered for other uses as set out in question 6 above? Yes: No: If yes, please supply site details to identify the site:	
could be considered for other uses as set out in question 6 above? Yes: No: If yes, please supply site details to identify the site: (We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites) Question 8: Do you have any comments on the document and the approach used to	

If yes, please explain:
(Please use additional box at the back of questionnaire if you need more space to comment)
About you:
Name:Hereford Enterprise Zone c/o Daniel Thompson
Address:The HARC, Fir Tree Lane, Rotherwas, HR2 6LA
Email:dthompson@herefordshire.gov.uk
Do you wish to be kept informed of future planning policy consultations?
Yes
No 🗆
(You have the right to withdraw your consent at any time by notifying us.)
Access to Information All personal data will be treated in line with our obligations under the Data Protection Access. Which includes the provisions of GDPR. This means your personal data will not be

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (FoI) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

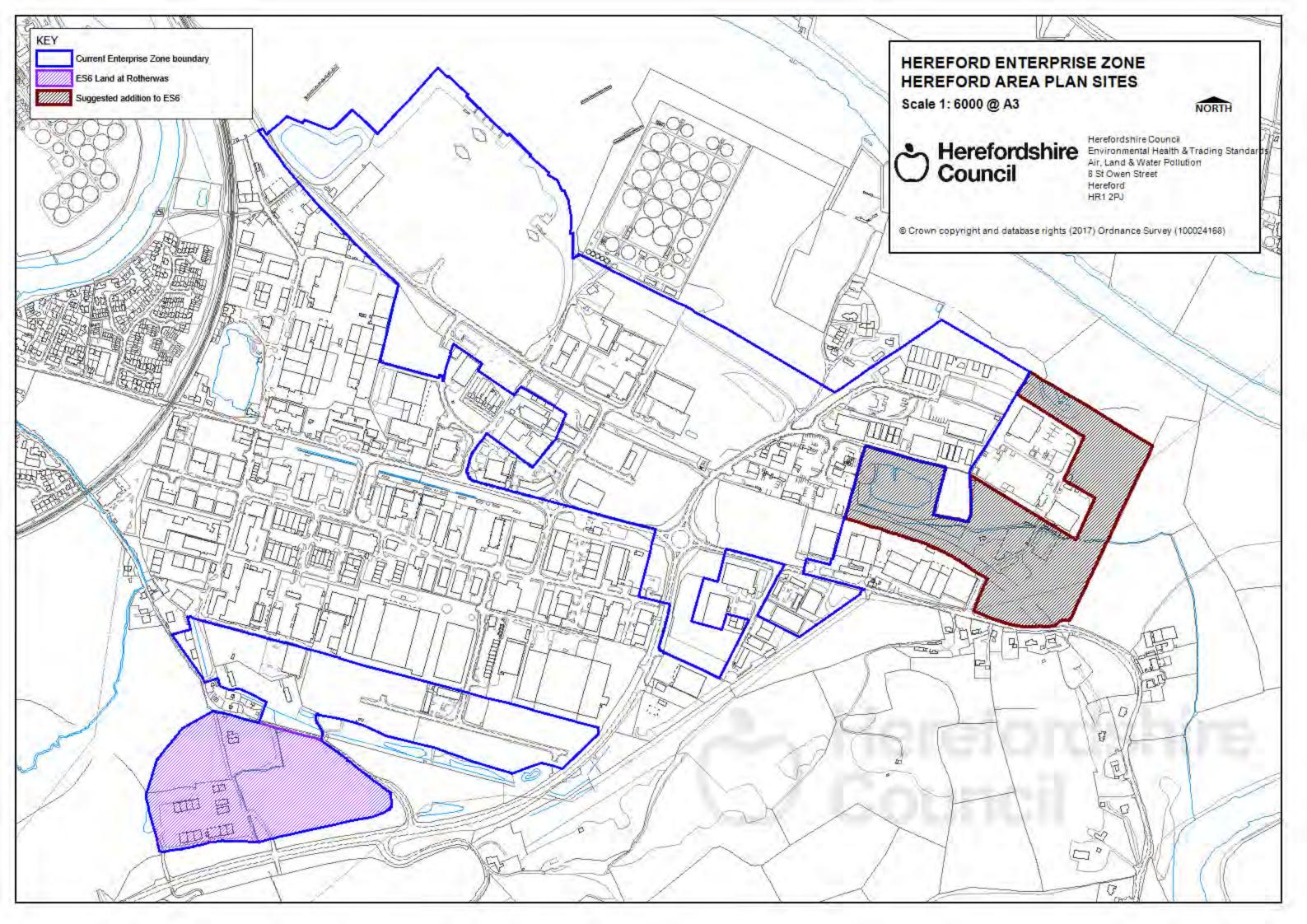
If you would like any further assistance, please contact us in one of the following ways: Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to: Forward Planning Herefordshire Council Offices Plough Lane Hereford Or by email to Idf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Question 8 continued	





Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address: www.herefordshire.gov.uk/herefordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herefordareaplan as well as at libraries and information centres across the county.

Complete the questions for as many sites as you would like to comment on. Please include the site reference for any you are making a specific comment on.

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:		
No:	•	

If no, please explain:

We have concerns for site options within the Central Edgar Street Grid area, Hereford city centre. The consultation document identifies 14 individual parcels of land within the central area (Cen 21a – Cen 21n). Except for 3 parcels of land (Cen 21k, 21l and 21m), all these plots sit within Floodzone 3 of the Yazor Brook.

Over recent years the lower reaches of the Yazor/Eign Brook have dried out completely on occasions. The result had a devastating impact on wildlife, with high fish mortality as well losses of invertebrate biodiversity. The Environment Agency is conducting a detailed investigation into these low flows and HWT staff and volunteers are involved. It seems possible that increasing development along the brook has contributed to these low summer flows, which are caused by complex interactions of multiple factors that are not

yet fully understood. Further development and modification to the floodplain runs the risks of exacerbating these problems and of pollutants entering the watercourse.

The risks associated with floodplain development are now widely recognised. We believe that plots within the floodzone are ideally suited to greenspace and a return to the natural function of the floodplain should be encouraged where possible. By protecting natural flood management processes wildlife habitat will be enhanced in the heart of the city providing blue/green corridors that improve habitat connectivity. The public will also benefit from better access to nature and through an enhanced public realm.

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?
Yes: □
No: ■
If yes, please supply site details to identify the site:
(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)
The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18). The phases are: • Short term, 0-5 years • Medium term, 5-10 years • Long term, 10 + years
Question 3: Do you think any particular sites should be developed in the short, medium or long term?
Yes
No ■■
Please explain your answer:

Employment Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development? Yes: □ No: If no, please explain: We agree with the selection of most sites provided that our wider concerns regarding biodiversity and habitat connectivity have been addressed as highlighted in Question 8. We welcome the decision not to progress plot Ayl15 (Land at Walney House Farm). Development on this land is likely to have a detrimental impact on the Lugg Meadows SSSI and Lugg SSSI/SAC. Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations? Yes: □ No: If yes, please supply site details to identify the site: (We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites) **Question 6:** Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities? Yes: ■

Question 6 continued...

No:

If yes, please supply site details:

As stated in question 1; we believe that the predominant use for land plots for the city centre (Cen 21a – Cen 21n) should be for the protection of natural flood management and biodiversity as well as the creation of greenspace.

could be considered for other uses as set out in question 6 above?			
Yes: □			
No: □			
If yes, please supply site details to identify the site:			
(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)			
Question 8: Do you have any comments on the document and the approach used to identify potential sites?			
Yes: □			
No: □			

Question 7: Do you think there are other more suitable sites not shown on the plan that

If yes, please explain:

Before final shortlisting we would expect a thorough ecological appraisal of all sites as well as an assessment of the accumulative impact on biodiversity and habitat connectivity where multiple plots are proposed. This is particularly important given Herefordshire's ecological datasets are lacking, especially our current understanding of the extent and condition of locally designated sites (LWSs & SWSs) and species data. The current absence of ecological data should not infer that wildlife is absent at any of the proposed sites.

The consideration given to the ecological/biodiversity value of these sites is weak. All the technical assessments repeat the same statement relating to the River Wye SSSI/SAC Impact Risk Zones and the need for future ecological appraisal should the sites be chosen for development. This is back to front; an assessment of the ecological value needs to be undertaken in order to determine the sites suitability for shortlisting and development. We feel that efforts in this respect have been insufficient, particularly when compared with other technical aspects (e.g. built heritage or archaeological interests) which received more tailored, site-specific consideration. This lack of consideration could be related to the absence of high quality ecological data.

All the land falls into the River Wye SSSI/SAC Impact Risk Zones and as such an Habitat Regulations Assessment should be prepared for the plan.

Commenting on the proposals was difficult, in part due to a lack of strategic overview for the plan. The consultation documents acknowledge this but still requires the consultee to comment on the suitability of each plot according to its individual merits and constraints. In theory, all plots *could* be potential development land when looked at in isolation but as a collective there are additional considerations, particularly the cumulative impact on wildlife and habitat connectivity but also how additional infrastructure will be integrated (e.g. transport links and green infrastructure). Linked to this is the provision of greenspace and bluespace and associated wildlife. The benefits that people derive from greenspace and contact with nature are now well documented. Semi-natural greenspace can be particularly valuable. Our view is that this provision should be met where additional benefits can be derived, e.g. where it supports natural flood management within flood

zones, provides localised climate regulation and/or addresses an existing lack of greenspace.
The plan also repeatedly states that 'current evidence indicates that there is an oversupply of amenity greenspace in the city'. This is often cited as evidence to support the loss of greenspace. These statements are not qualified within the document and in our view, there are areas of the city, particularly central and northern Hereford, where greenspace needs to be increased.
(Please use additional box at the back of questionnaire if you need more space to comment)
About you:
Name: Andrew Nixon

Address: Herefordshire Wildlife Trust, Queenswood Country Park, Dinmore Hill, Nr.

Email: a.nixon@herefordshirewt.co.uk

Do you wish to be kept informed of future planning policy consultations?

Yes ■

No □

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

Leominster, HR6 0PY

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (FoI) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways: Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to: Forward Planning Herefordshire Council Offices Plough Lane Hereford HR4 0LE

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.



WEST MIDLANDS

Herefordshire Council ldf@herefordshire.gov.uk

SENT BY EMAIL ONLY

Our ref: 82008 0121 625 6851 west.midlands@HistoricEngland.org.uk

6 October 2018

Dear Sirs,

Hereford Area Plan - Housing and Employment Site Options Consultation

Thank you for providing Historic England with the opportunity to engage in the preparation of the emerging HAP and due to the city's outstanding heritage value, to offer our advice as the Government's statutory adviser for the historic environment. We are particularly keen to ensure the HAP has a positive strategy for the historic environment in accordance with national policy and a conservation led approach to development in such a historically rich and sensitive area.

Following our previous written comments and discussions with Officers we are encouraged by the emerging HAP's progress and in particular that:

- an Historic Area Assessment of Hereford City (April 2018) has been completed;
- potential sites have been considered with respect to their potential impact on the historic environment, with each section having comments from their conservation and archaeological advisors (ref technical site assessments); and,
- a Design SPD is being prepared and will include a building heights strategy, public realm advice, the approach to the public realm, transport infrastructure and the treatment of the River Wye frontage. We assume this will be applied to inform the proposed allocations.

Nevertheless, to help provide both the local authority and Historic England with a greater degree of confidence in the suitability of the proposed sites and the strategy employed, it may be beneficial to meet to go through the sifted allocations and next iteration of the HAP. There are clearly a number of sensitive sites requiring particularly careful attention¹.

¹ BUR32, <u>Cen08, Cen21, Cen22</u>, Cen27, Cen29, Cen30, Stn05, Thr23, Thr26a, Thr30, Tup20, Tup22, ES3 & ES4. Historic England has previously commented on those underlined.





Further consideration/discussion may also be required in relation to the following:

- The HAP will include policies and proposals for growth in the city, including for housing, employment and urban regeneration. Is there sufficient information in the Evidence Base with regard to major development (notably the new university, and their spatial/number needs) to make the HAP robust? Is there sufficient information regarding the historic environment generally. Are the policies for guiding development sufficient?
- Section 3.9 suggests that the uses identified for sites should be flexible to accommodate the needs of the future University. Might the local authority secure more information regarding the University's needs to properly allocate the necessary and appropriate sites in the HAP to maximise the benefits for the town e.g. university space 'above the shop' and addressing upper level vacancy.
- As an Area of Archaeological Importance, great care will need to be given to understand the
 archaeological potential and suitability of site allocations. Following the recent visit to
 Hereford by the Urban Panel, its subsequent report to the Council made a number of
 recommendations including, for example, that the local authority consider undertaking a
 study to 'de-risk' archaeological sites. It will be useful to discuss this matter.
- The Urban Panel also advised the need for a city-wide masterplan to ensure the 'University City' (underpinned by a movement strategy, parking strategy, green infrastructure strategy, archaeological management strategy, views analysis, building heights strategy, design strategy and capacity study). The Urban Panel also recommended consideration of how to improve the 'sense of arrival' at the station; reducing city centre traffic; how the City Walls might be better presented/appreciated (including through developing traffic strategies); and, improving the setting of Coningsby Hospital and Blackfriar's Priory.

We note at paragraph 3.3 reference to the Urban Panel visit and positively states that ' α number of its recommendations are being addressed as part of developing the evidence for the HAP'. A meeting would provide an opportunity to more fully appreciate the evidence prepared and how the Urban Panel's recommendations might be addressed.

I hope our suggestions are useful. We look forward to hearing from you in due course and to meeting to discuss the above.

Sincere regards

Rohan Torkildsen Historic Environment Planning Adviser - West Midlands & the South West Rohan.Torkildsen@HistoricEngland.org.uk





Latham, James

From: ldf

 Sent:
 01 October 2018 10:23

 To:
 Gilson, Susannah

Subject: FW: Hereford Area Plan (HAP) questionnaire completed

Follow Up Flag: Follow up Flag Status: Completed

And another.

Kev

From: Jo Jones

Sent: 30 September 2018 20:01 **To:** ldf <ldf@herefordshire.gov.uk>

Subject: Hereford Area Plan (HAP) questionnaire completed

Please find our completed questionnaire below.

Yours Sincerely

Mrs Jones

Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each. Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address: www.herefordshire.gov.uk/herefordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herefordareaplan as well as at libraries and information centres across the county.

Complete the questions for as many sites as you would like to comment on. Please include the site reference for any you are making a specific comment on.

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

No:
If no, please explain:
TUP26
 Concerns over the already low water table as when heavy rain falls part of this area floods. It sits on the proposed area and covers the lower part of Queenswood Drive. Houses have had sandbags outside them before during heavy rain fall. A large number of mature trees sit all over this land. The land is used by both local children and families as well as dog walkers. There are a large number of houses looking onto this area. The top field is used for football practise/matches. When this is going on (normally every weekend and once or twice during the week) the road is full of parked cars already making it difficult to pass in a car. The area is already over populated due to the good schools.
Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?
Yes:
No:
If yes, please supply site details to identify the site:
• Another area out of town that is not having a knock on effect to those already build houses and families living there.
•Areas that are not already built up and are densely populated.
All brownfield land within Hereford
(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)
The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18). The phases are: • Short term, 0-5 years • Medium term, 5-10 years • Long term, 10 + years
Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes:

Yes

<u>No</u>

Please explain your answer: • No development should happen in TUP26
Employment
Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?
Yes:
No:
If no, please explain:
 Future development should be more diverse and not focus so heavily on land development. A larger development site would create more permanent employment.
Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?
Yes:
No:
If yes, please supply site details to identify the site:
• The Apple orchard on the Hampton Bishop road - It's a more substantial site to develop creating future long term employment
(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)
Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?
Yes:
No:
Question 6 continued If yes, please supply site details:
Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?
Yes:
No:

If yes, please supply site details to identify the site:

• sites out of town and can accommodate parking needs.

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain:

- not notifying local residents about on the proposed site
 - the councils communication with local residents MUST be improved

(Please use additional box at the back of questionnaire if you need more space to comment)

About you:

Name: Mrs Joanne Jones

Address:

Email:

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (FoI) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways:

Email: <u>ldf@herefordshire.gov.uk</u> or telephone <u>01432 383357</u>

Paper questionnaires can be returned by post to:

Forward Planning
Herefordshire Council Offices
Plough Lane
Hereford
HR4 0LE

Or by email to ldf@herefordshire.gov.uk

<u>Please return this questionnaire by midnight on 8th October 2018</u> Thank you for taking time to share your views with us.

Question 8 continued...

Sent from my iPhone



Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address: www.herefordshire.gov.uk/herefordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herefordareaplan as well as at libraries and information centres across the county.

Complete the questions for as many sites as you would like to comment on. Please include the site reference for any you are making a specific comment on.

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No: X

If no, please explain:

The representations prepared by Lichfields on behalf of Keepmoat provides detail regarding our concern about the deliverability of particular sites.

We would supplement those representations by endorsing the allocation of the Burghill Hospital Farm/Land at Cot Barn Farm sites within the HAP

Burghill Hospital Farm / Land at Cot Barn Farm (BUR09)

Burghill Hospital Farm (also known as Land at Cot Barn Farm) (BUR09) is a greenfield site accessed via Roman Road and Canon Pyon Road. This site offers a suitable location for development in the medium term, which aligns with the preferred strategic direction of growth in

the Core Strategy, complements the planned delivery of the Relief Road and represents a deliverable development option that is free from constraints.

The site is located close to two allocated strategic sites: Northern Urban Extension (Holmer West) (Policy HD4) and Western Urban Extension (Three Elms) (Policy HD5). The development of these two strategic sites will change the landscape setting of Hereford from the north, against which the proposed Burghill Hospital site will be seen.

The site is located adjacent to the proposed route of the Relief Road, which will create a new functional boundary to the north of Hereford. The Burghill Hospital Farm site will therefore form a logical urban extension to Hereford that would infill to the new boundary. There are no flooding or national policy (NPPF footnote 6¹) constraints that would impede the delivery of the site. It is therefore considered to represent a deliverable opportunity for residential development.

The site is available for delivery; it is owned by the Council and benefit from developer's commitment from Keepmoat Homes which has been appointed as the Council's Development and Regeneration partner. However, it should be noted that the land within the Council's ownership is less than that shown in the Issues and Options consultation document as comprising site BUR09. The 16.8ha Council land is shown below and excludes the land immediately around Cot Barn Farm.



¹ NNPF policies relating to: habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change.

The delivery of the Relief Road will help to improve travel times and reduce congestion and will help to address the impacts of additional development to the north and west of Hereford. In advance of the completion of the Relief Road, however, there is a need to carefully consider the impact on transport of any new development in the area. Accordingly, the existing cap on the level of new development that can be provided to the north of Hereford prior to the completion of the Relief Road may also impact on the rate at which this site can be brought forward. Keepmoat Homes is progressing work in relation to this site in order to identify a preferred development option. This work includes:

- 1 An assessment of access arrangements into the site, including the availability of additional land fronting Canon Pyon Road;
- 2 The modelling of the A4110/A4103 and the A48/A4103 junction capacity and transportation impact of development in this location;
- 3 Ecological assessment; and,
- 4 Landscape assessment.

It is anticipated that more information will become available as the HAP process moves forward.

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:	_		
No:	X		
No co	omment		

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No X

Please see representations submitted by Lichfields on behalf of Keepmoat Homes.

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:	
ıcs.	

No: □
No comment
Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?
Yes: □
No: □
No comment
Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?
Yes:
No: X
Please see representations submitted by Lichfields on behalf of Keepmoat Homes.
Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?
Yes: □
No: □
No comment
Question 8: Do you have any comments on the document and the approach used to identify potential sites?
Yes: □
No: □
Please see representations submitted by Lichfields on behalf of Keepmoat Homes.

About you:

Name: Richard Moore / Paul Allen, Keepmoat Homes

Address: 4 Blackfriars Street, Hereford, HR4 9HS

Email: richard.moore@keepmoat.com / paul.allen@keepmoat.com

Do you wish to be kept informed of future planning policy consultations?

Yes X

No

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (FoI) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways: Email: Idf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to: Forward Planning Herefordshire Council Offices Plough Lane Hereford HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Latham, James

From: Singleton, Kevin

Sent: 09 October 2018 10:23

To: Gilson, Susannah

Subject: FW: Contact us form submitted

Hi Susi

Another rep via a contact form.

Kev

From: DMScanning

Sent: 09 October 2018 10:02

To: Singleton, Kevin <Kevin.Singleton@herefordshire.gov.uk>

Subject: FW: Contact us form submitted

Hi Kev

Is this one for you as I can't see an application? Thanks

Helen Buttery Technical Support Officer 01432 260 480

Heref ordshire.gov.uk

Economy and Place Directorate
Technical Support Officer
Development Management
Plough Lane Offices Hereford HR4 0LE
Tel | 01432 260480

Email | hbuttery@herefordshire.gov.uk

♣ Please consider the environment - Do you really need to print this e-mail?

General Planning Enquiries: <u>planningenquiries@herefordshire.gov.uk</u> Planning Registration Enquiries: <u>planningregistration@herefordshire.gov.uk</u> Postal Address: Herefordshire Council Planning Services Council Offices Plough Lane Hereford HR4 0LE

Main Council Switchboard: 01432 260000

Postal Address: Herefordshire Council Planning Services Council Offices Plough Lane Hereford HR4 0LE

Main Council Switchboard: 01432 260000

Any opinion expressed in this e-mail or any attached files are those of the individual and not necessarily those of Herefordshire Council.

This e-mail and any attached files are confidential and intended solely for the use of the addressee. This communication may contain material protected by law from being passed on. If you are not the intended recipient and have received this e-mail in error, you are advised that any use, dissemination, forwarding, printing or copying of this e-mail is strictly prohibited.

If you have received this e-mail in error please contact the sender immediately and destroy all copies of it and please notify the IT Service Helpdesk at the Herefordshire Council, telephone 01432 260160

From: donotreply@herefordshire.gov.uk [mailto:donotreply@herefordshire.gov.uk]

Sent: 08 October 2018 12:25 **To:** Planning Enquiries

Subject: Contact us form submitted

The contact us form has been submitted to your service area with the following details:

Caption	Value
Name	Nathaniel Knowles
Email	
Telephone	
Nature of enquiry	Planning
Message	Nathaniel Knowles 08/10/2018 Dear Sir/Madam, I'm writing to register my objection to the proposals to build houses on the field at the end of Foley Street as outlined in the Hereford plan. The field is well used by dog walkers, adults and most importantly children. I also believe that the site is protected by a covenant that dictates that the land be sued for the enjoyment of the people of the local area. In addition, I would add that although I support the development of housing in general, this should be done with careful consideration and preferably on the city outskirts where the city can be allowed to expand. Simply building on every bit of green space in the city centre risks turning Hereford into another urban jungle – despite how tempting the profits from such an endeavour may be. In addition, there are limited alternatives for the children should this land disappear. All of which mean crossing main roads and walking considerable distance. Finally – the issue of parking should also be raised. Plans to introduce residents parking on Foley Street have already been passed and justified by you to try to reduce the number of cars parking here. Yet in the same breath you propose building more houses which will inevitably bring more cars. I urge you to remember what makes our city so special and different from others and that includes its green

spaces. The feeling of the local residents has also been clearly voiced – please refer to the article in the Hereford Times if you need more evidence. I hope I can help convince you to concentrate less on turning a profit and more on keeping our city centre green and beautiful. Mowing it every now and again wouldn't hurt either? Yours Sincerely Nathaniel Knowles