

NOTES ON TITLEY NDP

POLICY TG1 – Sustainable Development

• Net gains biodiversity – is this same metric as expected nationally? How will that be measured in advance of requirement for net gain coming in?

POLICY TG2

 Point 6 – Seeks to impose a lower threshold for affordable housing. Does not align with NPPF or CS. Seeking to use NPPF para 64, but this lower threshold only applies in designated areas - National Parks, Areas of Outstanding Natural Beauty and areas designated as 'rural' under Section 157 of the Housing Act 1985. Policy not in accord with local or national policy as far as we are aware.

POLICY TG3

- Rural exception housing policy. Generally reiterates H2.
- Perhaps needs more supporting text to qualify how 'proven local need will be assessed'.
- At face value, this policy does not add anything that is not already set out in H2. The only difference is that it seeks proposals "to be agreed with Parish Council'. This is not appropriate REDACTED. Consultation with the PC should be encouraged, but ultimately they are not the decision making body.

POLICY TG4

- Effectively an allocation policy for 6 units
- Only 0.175ha of the site will be assigned for housing. This leads to a density equivalent to of ~35 units per hectare. This is much higher than the rest of the village and particularly at odds with the site's immediate setting; which is low density and has very open feel.
- The policy sets out very prescriptive requirements some of which contradict with each other. For instance, orientation to street scene vs solar gain.
- Overall it is considered it would be difficult to achieve an acceptable form of development within the parameters set by the policy.

POLICY TG5 – Settlement Boundary

- Balance Farm omitted should be included. Well known issue.
- REDACTED. Would suggest that should this happen, site will need to be considered on its merits. Issues such as highways safety would need to be considered for instance and if not achievable then being within boundary wouldn't mean that permission will necessarily be granted.
- Also unclear why there is a very narrow 40m separation between the boundaries to the north-east and south-west parts of the village. Does this frontage gap have particular value? If not, it would appear as a logical infill plot.
- The strategy counts sites 'held with phosphate' towards its housing numbers, but is advocating a settlement boundary which would mean the principle of development on these sites would no longer be acceptable if NDP adopted. Eg. 193183 at Titley Court would be outside the boundary if plan adopted and therefore refused. If the parish seek to

rely on these sites to meet needs and find them acceptable, then they should be included within the boundary.

- Would it not be logical to include the barn conversions at Titley Court and 193183 within the settlement boundary, given they are contiguous with the allocated site?
- Boundary is generally quite tightly drawn. Would question whether a windfall allowance is achievable given limited opportunities for infilling.
- Policy needs to include clause along lines of 'outside of these boundaries, new housing will be limited and only be supported in accord with RA3'
- The policy seeks to ensure external walls are stone/timber/slate (point 9.) Has justification been shown for this? In our opinion, these materials do not particular define Titley. There is a large variety in the palate of materials seen throughout the village.

TG6 – Land opposite Old Court

- This is an aspirational policy which may prove difficult to deliver. To place a policy requirement on a scheme for 5 units to provide a large area of community open space and village car park is quite onerous. Also setting the threshold that only 25% of the site can be used for dwellings, gardens, garages, parking and access arrangements is very prescriptive and it will likely be difficult to produce a scheme that meets other design requirements whilst keeping to these parameters.
- The requirement to position dwellings to the rear of the site would be at odds with the prevailing pattern of development, which is wayside.
- Again requirement for materials to be stone/timber/slate. Has justification been shown for this?

TG7 – Small sites at Staunton

- What is meant by 'sympathetically-designed individual dwellings'? Does this mean each site is effectively 'allocated' for a single dwelling each, or could the sites support more than one dwelling provided they are individually designed? Would suggest the intended quantum of development on each site needs to be clarified (if applicable) and the wording of the policy tightened up.
- Again requirement for materials to be stone/timber/slate. Has justification been shown for this?

TG8 – Settlement boundary Staunton

- Unsure of justification for small break in settlement boundary splitting village into two parts? Is the gap is particularly important to the character of the village?
- Policy needs to include clause along lines of 'outside of these boundaries, new housing will be limited and only be supported in accord with RA3'
- Again requirement for materials to be stone/timber/slate. Has justification been shown for this?

TG13

• Does this need more clarity on important views? Can these be defined better?

TG14

• Point 5 – is this effectively a neutrality clause? Is that appropriate or informed by current SAC issues? Maybe overreaching?

TG15

• Suggest this include an NPPF style – harm not permitted, unless demonstrably outweighed by the public benefits of the scheme.

General

Has it been considered whether Stagg Meadow could be allocated local green space?

From:	Turner, Andrew
Sent:	02 March 2023 16:12
То:	Neighbourhood Planning Team
Subject:	RE: Titley Group Regulation 16 submission neighbourhood development plan consultation

RE: Titley Group Regulation 16 submission neighbourhood development plan consultation

Dear Neighbourhood Planning Team,

I refer to the above and would make the following comments with regard to the above proposed development plan.

It is my understanding that you do not require comment on Core Strategy proposals as part of this consultation or comment on sites which are awaiting or have already been granted planning approval.

Having reviewed records readily available, I would advise the following regarding the four proposed housing site allocations (policies TG4, TG6 and TG7) as indicated in brown on 'Plan 4: Titley site allocations and settlement boundary' & 'Plan 5: Staunton-on-Arrow site allocations and settlement boundary'

Policy TG4: Land at Titley Farm

• Regarding sites with a historic agricultural use, I would mention that agricultural practices such as uncontrolled burial of wastes or excessive pesticide or herbicide application may be thought of as potentially contaminative and any development should consider this.

Policy TG6: Land opposite Old Court Cottage/Newton, Staunton-on-Arrow

• The NDP indicates that the site is currently being used as an orchard.

By way of general advice I would mention that orchards can be subject to agricultural spraying practices which may, in some circumstances, lead to a legacy of contamination and any development should consider this

Policy TG7:

1.Lland west of Jacobs Oak

• A review of Ordnance survey historical plans indicate that the proposed development is adjacent to a former saw mill (south of the site)

It is possible that unforeseen contamination may be present at the above mentioned site.

Consideration should be given to the possibility of encountering contamination as a result of its former use and specialist advice be sought should any be encountered during the development.

2. land east of the Old Vicarage.

• A review of Ordnance survey historical plans indicate there have been no previous historic potentially contaminative uses at the proposed development site.

General comments:

Developments such as hospitals, homes and schools may be considered 'sensitive' and as such consideration should be given to risk from contamination notwithstanding any comments. Please note that the above does not constitute a detailed investigation or desk study to consider risk from contamination. Should any information about the former uses of the proposed development areas be available I would recommend they be submitted for consideration as they may change the comments provided.

It should be recognised that contamination is a material planning consideration and is referred to within the NPPF. I would recommend applicants and those involved in the parish plan refer to the pertinent parts of the NPPF and be familiar with the requirements and meanings given when considering risk from contamination during development.

Finally it is also worth bearing in mind that the NPPF makes clear that the developer and/or landowner is responsible for securing safe development where a site is affected by contamination.

These comments are provided on the basis that any other developments would be subject to application through the normal planning process.

Kind regards

Andrew

Herefòrdshire.gov.uk

Andrew Turner Technical Officer (Air, Land & Water Protection) Economy & Environment Directorate Direct Tel: 01432 260159 Email: <u>aturner@herefordshire.gov.uk</u>



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200 Lichfield Lane Berry Hill Mansfield Nottinghamshire NG18 4RG



Tel:01623 637 119 (Planning Enquiries)Email:planningconsultation@coal.gov.ukWeb:www.gov.uk/coalauthority

For the Attention of: Neighbourhood Planning Team

Herefordshire Council

[By Email: neighbourhoodplanning@herefordshire.gov.uk]

07 February 2023

Dear Neighbourhood Planning Team

<u>Titley Group Neighbourhood Development Plan - Regulation 16</u></u>

Thank you for consulting The Coal Authority on the above.

Having reviewed your document, I confirm that we have no specific comments to make on it.

Should you have any future enquiries please contact a member of Planning and Local Authority Liaison at The Coal Authority using the contact details above.

Yours sincerely

Christopher Telford BSc(Hons) DipTP MRTPI Principal Development Manager Herefordshire Council Forward Planning PO Box 4 Hereford Herefordshire HR4 0XH Our ref: SV/2022/111226/OR-10/PO1-L01 Your ref:

Date: 21 February 2023

FAO: James Latham

Dear James

Titley Group Neighbourhood Plan Regulation 16 Submission

I refer to your consultation of the Titley Group Regulation 16 Neighbourhood Development Plan (NDP) Submission consultation. We have reviewed the submitted document along with the attached Environmental Report (ER) and Appropriate Assessment (AA) by Herefordshire Council and have the following comments to offer 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. The updated evidence base did not extend to Rural Parishes at the NDP level so it is important that these subsequent plans offer robust confirmation that 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. Herefordshire Council have begun the Local Plan review process including updates to the evidence base.

Flood Risk: We note that the River Arrow and Hindwell Brook (both statutory main rivers) flow across the catchment area, there are also some ordinary water courses that act as tributaries to the River Arrow and Hindwell Brook. These various main rivers and ordinary watercourses have associated Flood Zones 3 and 2 (the high and medium risk zones respectively) which can be seen on our Flood Map for Planning. Please note that other potential development areas may be at flood risk given the presence of un-modelled ordinary watercourses based on the scale and nature of the stream and receiving catchment (less than 3km2).

The extent of the mapped Flood Zones within the Neighbourhood Plan area remain in 'Plan 3: Titley Group SEA, Minerals, Biodiversity and Flood Zones' on page 10 of the Draft Neighbourhood Plan.

Site Allocations: We previously provided comment upon the four allocated housing sites within the NDP, these are unchanged since the Regulation 14 draft.

'Land at Titley Farm' (policy TG4), 'Land opposite Old Court Cottage/Newton' (policy TG6) and 'Land West of Jacobs Oak' (policy TG7) are all entirely within Flood Zone 1.

'Land east of the Old Vicarage' is also sited within Flood Zone 1, this site is within closer proximity to the River Arrow and an ordinary watercourse sits between the site and the River. It appears from our mapping that there is a steep bank between the ordinary watercourse and the site which confirms that the site is fully within Flood Zone 1.

We would not, in the absence of specific sites allocated within areas of fluvial flooding, offer a bespoke comment on flood risk at this time. It should be noted that our Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with the drainage team at Herefordshire Council as the Lead Local Flooding Authority (LLFA).

River Wye SAC Catchment: It is noted that Titley Group falls within the River Lugg Sub-catchment and that an AA (dated December 2022) has been undertaken in light of recent comments from Natural England (NE). As confirmed within the AA document the most significant issue within the River Wye SAC Catchment (included the River Lugg) relates to water quality and the potential impact of policies and site allocations within the NDP's.

We have previously provided comment on similar NDPs' with a view to ensuring a robust submission and that development can be achieved without impact on the integrity of the SAC, primarily within the Lugg Catchment.

The AA correctly confirms that Herefordshire Council are seeking to progress mitigation measures, including integrated wetlands, to assist in the reduction of phosphate levels and with a view to resolving water quality issues within the County, specifically the Lugg Sub-catchment.

It is noted, and welcomed, that the NDP includes a specific Policy section on the River Wye Special Area of Conservation and that **Policy TG14 – part 5** makes specific reference to impacts on the Catchment, including the need for nutrient neutrality and mitigation measures to secure such. It also references the Phosphate Budget Calculator Tool which is an important tool with regards to the Nutrient Neutrality issues within the Catchment.

In consideration of the above Herefordshire Council should be satisfied, in consultation with NE, as the primary consultation body on this matter, that this approach, including possible mitigation, is a viable and deliverable and that there is a reasonable degree of certainty provided to take forward the sites in the plan.

I trust that the above is of assistance, please feel free to contact me if you would like to discuss our response.

Yours faithfully

Mr. Matt Bennion Planning officer

Direct e-mail matthew.bennion@environment-agency.gov.uk



Mr James Latham Herefordshire Council Neighbourhood Planning & Strategic Planning Plough Lane Hereford Herefordshire HR4 0LE Direct Dial: 0121 625 6887

Our ref: PL00788482

23 February 2023

Dear Mr Latham

TITLEY GROUP NEIGHBOURHOOD PLAN - REGULATION 16 RESUBMISSION

Thank you for the invitation to comment again on the above reviewed Neighbourhood Plan.

Historic England remains supportive of both the content of the document and the vision and objectives set out in it.

We commend the fact that the Plan has an extremely sound evidence base that includes reference to the Herefordshire Council Historic Environment Record and County Landscape Character Assessment.

The emphasis on the conservation of local distinctiveness and variations in local character through good design including through adherence to clear Design Principles evidenced through the Design and Access Policy (TG16) and the protection of archaeological remains, historic farmsteads, landscape character and locally significant views is to be applauded.

In conclusion, the plan reads as a well-considered, concise and fit for purpose document which we consider takes a suitably proportionate but very thorough approach to the historic environment of the Parish.

I hope you find these comments helpful.

Yours sincerely,

P. Boland.

Peter Boland Historic Places Advisor peter.boland@HistoricEngland.org.uk



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH Telephone 0121 625 6888 HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment

From Herefordshire Council Strategic Planning Team

Name of NDP: Titley Group Regulation 16 NDP

Date: 28/02/2023

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
TG1: Sustainable development	SS1; SS2; SS4; SS5; SS6; RA2; RA6; MT1; E3; LD1	Y	
TG2: Housing needs and requirements	H1; H3	N	As it stands, the wording of the reg16 NDP (policy or justification) cannot be considered compliant with the adopted Core Strategy or NPPF as it is not about whether Titley is designated as a "rural settlement" but whether it lies within a "designated rural area" under the Housing Act 1985. Suggest the policy needs to be amended to indicate that the thresholds of policy H1 of the Core Strategy will continue to be applied unless and until Titley falls within a designated rural area.
TG3: Rural exception housing	SS2; H1; H2	Y	
TG4: Land at Titley Farm	SS1; SS2; RA2	Y	
TG5: Titley settlement boundary	SS2; RA2	Y	
TG6: Land opposite Old Court	SS2; RA2	Y	

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
Cottage/Newton, Staunton-on-Arrow			
TG7: Small sites at Staunton-on-Arrow	N/A	Y	
TG8: Staunton-on Arrow settlement boundary	SS2; RA2	Y	
TG9: Economic development in Titley Group	E1; E3; E4; RA4; RA5; RA6	Y	
TG10: Infrastructure	SS1; SS5; E3	Y	
TG11: Renewable energy	SS7; SD2	Y	
TG12: Community facilities	SC1	Y	
TG13: Landscape	LD1	Y	
TG14: Natural Environment	LD2	Y	
TG15: Historic environment	LD4, SS6	Y	
TG16: Design and access	SS1; SS4; SS6; SS7; MT1; SD1; SD2;	Y	

Other comments/conformity issues:

From:	Website <no-reply@herefordshire.gov.uk></no-reply@herefordshire.gov.uk>
Sent:	13 February 2023 09:23
То:	Neighbourhood Planning Team
Subject:	Online form received: Comment on a proposed neighbourhood area

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Comment on a proposed neighbourhood area

Case reference: FS-Case-486557972

Comment details
Title: Mr
First name: James
Last name: Forbes
Email: REDACTED
Postcode search: REDACTED
Address:
Address line 1: REDACTED
Address line 2: REDACTED
Address line 3: REDACTED
Town or city: REDACTED
Postcode: REDACTED
County: REDACTED
Which plan are you commenting on?: Titley Village Group Neighbourhood Development Plan

Comment type: Objection

Your comments: Dear Sirs

Following numerous efforts to discuss and amend the Titley village group NDP with the steering committee, we wish to formally object to the Titley Village Group Neighbourhood development plan.

Having attempted to amend the NDP, the current committee has refused to amend the plan to include the

proposed development at Titley Court Barns - planning application P193183/F. To be clear, our planning application was validated on 9 September 2019 and has obviously been delayed due to the ongoing halt to planning permissions in the area.

Throughout our attempts, the understanding of the committee and the process seemed badly informed and not willing to engage. Specifically giving contradictory views to the council planners. I am also at a loss to understand why this site should influence any other potential development sites in the village - this seems to be a reason! It is clear this is not controversial and would simply tidy up an already very sympathetic and considered development.

Without quoting huge chunks of the Titley Group NDP, it is very clear we are providing a sustainable development, demolitioning and a rebuilding of an old ugly building constructed from breeze blocks and asbestos roofing and providing more needed housing.

The proposed houses have been designed to fit in with the surroundings and the recently converted barns. Due to our understanding of the process, which we informed the steering committee about, the NDP will influence the planning process even if it is not approved, ie anything outside the village envelope will be refused. If this does happen, the two phosphate credits we have bought would be lost as they are tied to the specific planning application. As it stands without the NDP, it has been indicated our application would be considered favourably and would finish off the current site with a far more aesthetically pleasing structure (for all to see).

The application has been very considered with two efficient 3 bedroom units, which fits in the planners most desirable (type & size) properties - also mentioned in the NDP.

As well as already having a very good access and connections to services and utilities, this development will have very limited negative impact on the environment or anything controversial from a site perspective. This site is already a brown field site, being part of group of agricultural barns that have been converted to residential, with no negative impact to the village.

I only wish these reasons would have been considered by the steering committee and regret that this objection has had to be submitted. Having digested the NDP it is frustrating this is not considered an 'open goal' to actually implement the perceived role of the NDP.

Yours faithfully James Forbes Date: 03 March 2023 Our ref: 419635 Your ref: Tiley Group Neighbourhood Plan

Mr J Latham Neighbourhood Planning & Strategic Planning Team Hereford Council

BY EMAIL ONLY neighbourhood.planning@herefordshire.gov.uk

Dear Mr Latham

Titley Group Neighbourhood Development Plan – Regulation 16 Consultation

Thank you for your consultation on the above dated 19 January 2023.

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

Natural England has previously commented on the Tiley Group Neighbourhood Development Plan and made comments to the parish council in our response 30 September 2022.

Natural England does not have any additional comments on the Tiley Group Neighbourhood Development Plan.

For any further consultations on your plan, please contact: <u>consultations@naturalengland.org.uk</u>.

Yours sincerely

Hayley Fleming West Midlands Area Team



Hornbeam House Crewe Business Park Electra Way Crewe Cheshire CW1 6GJ

T 0300 060 3900

From: Sent: To: Subject: Grace Lewis <Grace.Lewis@networkrail.co.uk> 21 February 2023 12:16 Neighbourhood Planning Team Titley Group NDP

OFFICIAL

Dear Sir/Madam,

Thank you for consulting NR on the **Titley Group NDP**. Network Rail have no comments to make on the plan due to no railway infrastructure being within the plan area.

Yours Sincerely,

Grace Lewis

Town Planning Technician (Wales and Western) Network Rail Temple Point, Redcliffe Way, Bristol, BS1 6NL E grace.lewis@networkrail.co.uk www.networkrail.co.uk/property

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From:	HINDLE, Joanna (NHS HEREFORDSHIRE AND WORCESTERSHIRE ICB - 18C) <joanna.hindle3@nhs.net></joanna.hindle3@nhs.net>
Sent:	19 January 2023 10:03
То:	Neighbourhood Planning Team
Subject:	RE: Titley Group Regulation 16 submission neighbourhood development plan consultation

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Good Morning,

Thank you for notifying NHS Herefordshire & Worcestershire Integrated Care Board (ICB) of the Titley Group Parish Council Regulation 16 Neighbourhood Development Plan consultation.

NHS Herefordshire & Worcestershire ICB has no direct comment on the plan, but welcomes the Community Action for the Parish Council's plans to improve broadband and mobile phone reception, which is of benefit to the provision of healthcare into rural communities.

Kind Regards,

Jo Hindle Primary Care Contracts Officer NHS Herefordshire and Worcestershire 01905 896985 | 07521 059078| joanna.hindle3@nhs.net

Proud to be a part of Herefordshire and Worcestershire Integrated Care System

From: Sent:	Haines, Lucie <lucie.haines@cyfoethnaturiolcymru.gov.uk> 15 February 2023 09:17</lucie.haines@cyfoethnaturiolcymru.gov.uk>
То:	Neighbourhood Planning Team
Subject:	FW: Titley Group Regulation 16 submission neighbourhood development plan consultation NRW:01083162

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Mr Latham,

Many thanks for making us aware of this consultation – it is much appreciated.

Kind regards,

Lucie

Lucie Haines

Arweinydd Tim Cynllunio Datblygu Development Planning Team Leader Cyfoeth Naturiol Cymru Natural Resources Wales Ffôn/Tel: 07824 538020 E-bost/E-mail: lucie.haines@cyfoethnaturiolcymru.gov.uk / lucie.haines@naturalresourceswales.gov.uk Gwefan / Website: www.cyfoethnaturiolcymru.gov.uk / www.naturalresourceswales.gov.uk Rhagenwau:hi/hithaeth Pronouns:she/her Please note I do not currently work on Fridays

Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy.

Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably.

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Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi. Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

From:	Hammond, Victoria
Sent:	01 March 2023 07:53
То:	Neighbourhood Planning Team
Subject:	Titley Group Regulation 16 submission neighbourhood development plan
	consultation

Dear NDP team,

Please find below comments from the transportation team for the Titley Reg 16 NDP.

Transport strategy/active travel:

- P12 Sec 3.8 Objectives-No mention of active travel in the objectives. Suggest rewording last objective to: "Supporting high quality *sustainable* design solutions that make a positive contribution to local character and distinctiveness, *with development supported by appropriate infrastructure*"
- P43 Sec 8.20- Policy TG16 bullet no 2-Government updated their building reg legislation on 15th June 2022 making it a requirement for all new residential buildings and homes which have provision for car parking to have electric car charging points https://www.gov.uk/government/publications/infrastructure-for-charging-electric-vehicles-approved-document-s. Suggest adding text in red to bullet no 2 "incorporating sustainability measures to include building orientation and design, energy and water conservation, sustainable construction methods and materials, the generation of renewable energy, and provision for the recycling of waste, cycle storage, charging points for electric vehicles, communications and broadband technologies"
- P33 Sec 7.11- This paragraph could also usefully mention Herefordshire Council's Highway Design Guide for New Developments and that where necessary, a Transport Assessment (or Statement) should be provided with new developments setting out measures required to deal with the anticipated transport impacts of development. This should include providing for pedestrian and cyclists so as to improve and encourage safe active travel.
- **P34 Policy TG10:** This should mention the requirement where necessary, for a Transport Assessment setting out measures required to deal with the anticipated transport impacts of development.
- **P36 Policy TG12** Suggest adding that development proposals for the enhancement of community facilities will be supported as long as sufficient provision is made for cycle parking, and full use is made of the available opportunities to improve access on foot, by cycling or by public transport

Many thanks Vicky Herefòrdshire.gov.uk

Victoria Hammond Senior Transport Planning Officer vhammond2@herefordshire.gov.uk Economy and Environment Plough Lane Hereford HR4 0LE