

Shaping Our Place 2026

Local Development Framework

# Place Shaping Free Write Analysis Schedule - Update

October 2010

## Contents

Introduction

List of question schedules:

### *Spatial Strategy Questions*

- Q1 Do you agree with the overall preferred strategy for Herefordshire?
- Q2 Do you agree with the preferred strategy for the distribution of new homes?
- Q3 Do you agree with the proposals for phasing of housing development?
- Q4 Do you agree with the preferred strategy for jobs?
- Q5 Do you agree with the preferred strategy for new shops?
- Q6 Do you agree with the preferred strategy for new infrastructure?
- Q7 Do you agree with the overall strategy for Hereford?
- Q8 Do you agree with the overall for the Market Towns?
- Q9 Do you agree with the Overall Strategy for the Rural Areas?

### *Place Shaping Issues and Core Strategy options*

- Q10 Are there any key issues in Hereford that should be addressed?
- Q11 Do you agree with the preferred options for the urban area of Hereford?
- Q12b Which of the specific sustainable transport measures do you favour the most, or are there other measures that could be considered?
- Q14b Is there another combination of the suggested locations which could form an appropriate and realistic alternative option?
- Q16 Are there any additional key issues in Bromyard that should be addressed?
- Q17b Please explain any changes or things you do not agree with and why for the options for Bromyard.
- Q18 Are there any additional key issues that should be addressed?
- Q19 Are there any additional key issues in Ledbury that should be addressed?
- Q20b Please explain any changes or things you do not agree with and why for the options for Ledbury.
- Q22 Are there any additional key issues in Leominster that should be addressed?
- Q23b Please explain any changes or things you do not agree with and why for the preferred option for Leominster.

- Q24 Are there any additional Key issues in Ross-on-Wye that should be addressed?
- Q25b Please explain any changes or things you do not agree with and why for the options for Ross-on-Wye.
- Q26 Are there any additional issues in the rural areas that should be addressed?
- Q27b Please explain any changes or things you do not agree with and why for the preferred approach for new jobs and shops in the rural areas.
- Q28b Please explain any changes or things you do not agree with and why for the preferred approach for defining Rural Service Centres and Hubs.
- Q29b Please explain any changes or things you do not agree with and why for whether the level of housing proposed in the Rural Service Centres and Hubs is about right.
- Q30b For option 2 (Tier 2), what do you consider to be a 'reasonable' level of service and please explain any changes or things you do not agree with and why.
- Q31b Please explain any changes or things you do not agree with and why for the preferred approach for restricting new development in areas outside Tiers 1 and 2.

*General Core policies*

- Q32b Please explain any changes or things you do not agree with and why for the policy direction of Renewable energy.
- Q33b Please explain any changes or things you do not agree with and why for the policy direction of managing flood risk.
- Q34b Please explain any changes or things you do not agree with and why for the policy direction for water resources.
- Q35b Please explain any changes or things you do not agree with and why for the policy direction for Local Distinctiveness.
- Q36b Please explain any changes or things you do not agree with and why for the policy direction of Design.
- Q37b Please explain any changes or things you do not agree with and why for the policy direction of Movement in Herefordshire.
- Q38b Please explain any changes or things you do not agree with and why for the policy direction of Infrastructure Delivery in Herefordshire.
- Q39b Please explain any changes or things you do not agree with and why for the policy direction of Waste in Herefordshire.
- Q40b Please explain any changes or things you do not agree with and why for the policy direction for Minerals.

- Q41b Please explain any changes or things you do not agree with and why for the policy direction for maintaining employment land supply.
- Q42b Please explain any changes or things you do not agree with and why for the policy direction for Employment Land Provision.
- Q43b Please explain any changes or things you do not agree with and why for the policy direction for Education and skills.
- Q44b Please explain any changes or things you do not agree with and why for the policy direction for Tourism, Culture and Leisure.
- Q45b Please explain any changes or things you do not agree with and why for the policy direction for Housing Density.
- Q46b Please explain any changes or things you do not agree with and why for the policy direction for Housing Type and Mix.
- Q48b Please explain any changes or things you do not agree with and why for the policy direction of Gypsies and Travellers.
- Q49b Please explain any changes or things you do not agree with and why for the policy direction for Open Space, sport and recreation.
- Q50b Please explain any changes or things you do not agree with and why for the policy direction for Green Infrastructure.
- Q51b Please explain any changes or things you do not agree with and why for the policy direction for Health.
- Q52b Please explain any changes or things you do not agree with and why for the Implementation and Monitoring Strategy.

## Introduction

- 1.0 A Place Shaping Paper was published and consulted upon January to March 2010. This paper included a vision and objectives for Herefordshire 2026 and the preferred spatial strategy. It went on to outline a number of 'Place Shaping' options to address specific issues within Hereford, the market towns and the rural areas and finally a wide range of general policy options such as affordable housing, waste and flooding.
- 1.1 In order to gain opinions on the options a questionnaire was sent to all those registered on the LDF database and copies were made available on the website, at the roadshows and at Info centres and libraries across the County. More details on the consultation methods undertaken and the numbers of responses received can be seen in 'Consultation Statement Part 4' which is available on [www.herefordshire.gov.uk/ldf](http://www.herefordshire.gov.uk/ldf) or on request from the Planning Policy section.
- 1.2 A total of 52 questions were asked on the questionnaire, some 'tick box' asking people to choose one or more of the options and some 'free write' answers for people to express further views. Two reports have been produced to convey the findings of the 'Place Shaping' consultation. The first entitled 'Core Strategy: Place Shaping Results Report', highlights the results from the tick box answers on the questionnaire. A copy of the 'Results Report' is available on the Planning Policy website ([www.herefordshire.gov.uk/ldf](http://www.herefordshire.gov.uk/ldf)).
- 1.3 This is the second report and contains a number of schedules summarising the responses to the free write text questions. These have been grouped into themes. The schedules list the comments which were raised most often but it should be noted that the total number of comments made can be seen in the summary of questionnaire response section. The schedules also highlight some of the key stakeholder responses, the results of the sustainability appraisal and the relevant evidence base studies which need to be examined to further the Core Strategy.
- 1.4 The next stage of the Core Strategy will be to take the responses gathered for the consultations, the emerging evidence base and the results from the sustainability appraisal and Habitats Regulation Assessments and refine the Core Strategy document to form preferred options for Hereford, the Market Towns, Rural Areas and general policy options. It is anticipated that a targeted consultation, which will display the results of which preferred options are coming forward, will be in the summer 2010.

<b>Question:</b>	<b>Qu: No:</b>
Do you agree with the overall preferred strategy for Herefordshire	1a/b
<b>Summary of Questionnaire responses (from associated report)</b>	
Total no. respondents 456	
Yes - 211 (46%)	
Yes with minor changes - 118 (26%)	
No - 127 (28%)	
<b>Summary of free-write questionnaire comments received</b>	
As noted above less than 50% of respondents support the countywide strategy as drafted in the PSP. Of those not in agreement with the strategy or seeking changes, the main reasons are outlined below	
Concern at amount of housing growth imposed by region	82
Concern at settlement hierarchy methodology	26
Wrong distribution - more to rural areas	22
Should have a Plan B	21
Need greater emphasis on climate change and agricultural land protection	20
The character of natural environment and local distinctiveness should be maintained	20
Wrong distribution - too much to market towns or not enough in Hereford	20
Abandon relief road in favour of changes that restrict car use	15
Need to have sufficient infrastructure	13
Support	11
Need more affordable housing	10
Need relief road	8
Balance housing with employment	6
Focus more development to brownfield land	5
<b>Other comments with less than 5 responses include concerns re:</b>	
Deliverability	
Type of housing	
Role of Kington	
Cross border issues	
Housing trajectory	
Text changes	
Clarify spatial messages	
Greater ref to access to countryside and rights of way	
More emphasis on tourism	
No ESG	
More emphasis on economy, not just employment land	
The impacts of changing demographics on health facilities and hospitals	
Poor key diagram	

## **Summary of responses from Stakeholders**

**Welsh Water** - can provide element of projected growth but need more information re final growth figures to inform funding approval

**Natural England** - Need greater clarity in text re strategy regarding climate change

**Fire and Rescue** - Emphasis on climate change

**West Midlands Regional assembly** - General conformity but 100 too many houses. Retail developments should be defined in CS not later DPD's. Energy generation, minerals and waste should be recognised in spatial strategy.

**Environment Agency** - suggest text changes re flooding

**Hereford Civic Society** - Need Plan B

**CPRE** - Not enough reference to environmental quality in strategy or agricultural land protection.

**Parish and Town Councils** - a number of views were submitted by Parish and Town Councils concerning a variety of issues. Responses have suggested reviewing the Rural Settlement Hierarchy as a void is present in the SE of the County. The hierarchy is based on services within settlements rather than a geographical breakdown. A number of responses focused on changes to social demographics and the increased pressures this will cause on services particularly the health and hospitals. Proposed changes in demographics have been used to shape the policy directions and consultation with service providers including the PCT and health bodies has been undertaken with their views also contributing to the Core Strategy.

## **Any new issues to be considered in HAP or MTRAP:**

None

## **Any new options to be considered before Submission? No**

**Need for a Plan B** - Not considered realistic and still achieve preferred strategy - but will need to add flexibility into the deliverability of the Core Strategy. This can be achieved by referring to the need for a review of the plan to be instigated through monitoring, if the expected delivery of housing/infrastructure does not come forward as anticipated.

**Reduce housing numbers** - this option is not considered reasonable given the existing evidence supporting need and demand for housing and the late stage of plan production.

**Wrong distribution of amount or types of development** - different options for distribution were considered at Developing Options stage but discounted. The distribution proposed is based on achieving the spatial strategy, vision and objectives, to make changes now would be unreasonable.

## **Any new evidence required?**

Housing Provision and Distribution Paper in light of abolition of the Regional Spatial Strategy

<b>Question:</b>	<b>Qu: No:</b>
Do you agree with the preferred strategy for the distribution of new homes	2a/b
<b>Summary of Questionnaire responses (from associated report)</b>	
<p>Total no. respondents 450  Yes - 196 (44%)  Yes with minor changes - 110 (24%)  No - 144 (32%)</p>	
<b>Summary of free-write questionnaire comments received</b>	
<p>As noted above less than 50% of respondents support the distribution of housing as drafted in the PSP. Of those not in agreement or seeking changes, the main reasons are outlined below</p>	
Concern at amount of housing growth imposed by region	61
Concern at settlement hierarchy methodology	16
Wrong distribution	48
More to rural areas	18
Should have a Plan B	21
Need greater emphasis on climate change and agricultural land protection	15
The character of natural environment and local distinctiveness should be maintained	6
Concern regarding deliverability	6
More focus on sustainable transport	7
Need to have sufficient infrastructure	20
Support	19
Need more affordable housing	19
Need relief road	8
Balance housing with employment	8
Focus more development to brownfield land	9
<b>Other comments with less than 5 responses include concerns re:</b>	
New settlement	2
Too much affordable housing	1
Protect biodiversity	1
Need flexible phasing policy given large sites resting on new infrastructure	3

## **Summary of responses from Stakeholders**

**English Heritage** - Concerned at scale of development to Ledbury and Leominster.

**Hereford City Council** - What basis of need is amount of housing in Hereford based on?

**Natural England** - Questions sustainability of amount of housing to Leominster based on bringing forward a new road which will result in more car travel

**National Farmers Union** - Need to ensure sufficient sewerage facilities to meet Water Framework Directive

**West Midlands Regional assembly** - Need to refer to amount of affordable housing and brownfield land in submission document

**Leominster Civic Society** - What basis of need is used to account for

**CPRE** - Not enough reference to environmental quality in strategy or agricultural land protection.

**Town and Parish Councils** - A number of responses from town and parish councils have been received covering a variety of topics. Queries were raised regarding the level of growth proposed in the Rural Settlement Hierarchy and following comments received during consultation, the hierarchy will be reviewed. It should be noted that the location of settlements is based on existing service levels rather than a geographical distribution. Responses also stressed the protection of agricultural land and refusing development in flood risk areas. These are both national objectives and are supported in the core strategy.

## **Any new options to be considered before Submission? No**

**Need for a Plan B/Concern at deliverability** - A Plan B is not considered realistic to achieve and still follow the preferred strategy - but there is a need to add flexibility into the deliverability of the Core Strategy. This can be achieved by referring to the need for a review of the plan to be instigated through monitoring, if the expected delivery of housing/infrastructure does not come forward as anticipated.

**Reduce housing numbers** - this option is not considered reasonable given the existing evidence supporting need and demand for housing and the late stage of plan production.

**Wrong distribution of amount or types of development** - different options for distribution were considered at Developing Options stage but discounted. The distribution proposed is based on achieving the spatial strategy, vision and objectives, to make changes now would be unreasonable.

**Need more flexibility in phasing** - See Question 3

## **Any new evidence required?**

Housing Provision and Distribution Paper in light of abolition of the Regional Spatial Strategy

<b>Question:</b> Do you agree with the proposals for phasing of housing development	<b>Qu: No:</b> 3a/b																																								
<b>Summary of Questionnaire responses (from associated report)</b> Total no. respondents 424 Yes - 208 (49%) Yes with minor changes - 88 (21%) No - 128 (30%)																																									
<b>Summary of free-write questionnaire comments received</b> As noted above just less than 50% of respondents support the phasing of housing as drafted in the PSP. Of those not in agreement or seeking changes, the main reasons are outlined below <table border="0" data-bbox="145 689 1445 1458"> <tr><td>Concern at amount of housing growth imposed by region - should meet local needs</td><td>37</td></tr> <tr><td>Concern at settlement hierarchy methodology</td><td>0</td></tr> <tr><td>Wrong distribution</td><td>4</td></tr> <tr><td>Need to frontload housing more</td><td>22</td></tr> <tr><td>Should have a Plan B</td><td>0</td></tr> <tr><td>Need priority on land of least agricultural land protection</td><td>39</td></tr> <tr><td>The character of natural environment and local distinctiveness should be maintained</td><td>6</td></tr> <tr><td>Concern regarding deliverability</td><td>8</td></tr> <tr><td>More focus on sustainable transport</td><td>1</td></tr> <tr><td>Need to have sufficient infrastructure</td><td>3</td></tr> <tr><td>Support</td><td>10</td></tr> <tr><td>Need more affordable housing first</td><td>20</td></tr> <tr><td>Need relief road</td><td>1</td></tr> <tr><td>Balance housing with employment</td><td>5</td></tr> <tr><td>Focus more development to brownfield land</td><td>23</td></tr> <tr><td>Need to ensure 5 to 10 yr supply - cant count windfalls</td><td>6</td></tr> <tr><td>New settlement</td><td>1</td></tr> <tr><td>Clarification on Housing trajectory/phasing</td><td>7</td></tr> <tr><td>Need prematurity policy to manage housing land</td><td>1</td></tr> <tr><td>Should be having detailed allocations not broad locations</td><td>1</td></tr> </table>		Concern at amount of housing growth imposed by region - should meet local needs	37	Concern at settlement hierarchy methodology	0	Wrong distribution	4	Need to frontload housing more	22	Should have a Plan B	0	Need priority on land of least agricultural land protection	39	The character of natural environment and local distinctiveness should be maintained	6	Concern regarding deliverability	8	More focus on sustainable transport	1	Need to have sufficient infrastructure	3	Support	10	Need more affordable housing first	20	Need relief road	1	Balance housing with employment	5	Focus more development to brownfield land	23	Need to ensure 5 to 10 yr supply - cant count windfalls	6	New settlement	1	Clarification on Housing trajectory/phasing	7	Need prematurity policy to manage housing land	1	Should be having detailed allocations not broad locations	1
Concern at amount of housing growth imposed by region - should meet local needs	37																																								
Concern at settlement hierarchy methodology	0																																								
Wrong distribution	4																																								
Need to frontload housing more	22																																								
Should have a Plan B	0																																								
Need priority on land of least agricultural land protection	39																																								
The character of natural environment and local distinctiveness should be maintained	6																																								
Concern regarding deliverability	8																																								
More focus on sustainable transport	1																																								
Need to have sufficient infrastructure	3																																								
Support	10																																								
Need more affordable housing first	20																																								
Need relief road	1																																								
Balance housing with employment	5																																								
Focus more development to brownfield land	23																																								
Need to ensure 5 to 10 yr supply - cant count windfalls	6																																								
New settlement	1																																								
Clarification on Housing trajectory/phasing	7																																								
Need prematurity policy to manage housing land	1																																								
Should be having detailed allocations not broad locations	1																																								
<b>Summary of responses from Stakeholders</b> <b>WMRA</b> - Need housing trajectory and to better reflect Policy CF4 <b>FOE</b> - Growth point status is not appropriate for Hereford <b>CPRE</b> - Windfalls should be included and necessary infrastructure should be in place. Brownfield first. <b>Parish and Town Councils</b> - Of the Parish and Town Councils who responded to this question, there was general concern about building houses on greenfield land and the subsequent loss of high quality agricultural land. There is also concern among some about centrally imposed targets on house building. The general consensus is that the level of growth planned is unrealistic given the lack of infrastructure and jobs available to support the housing, particularly in rural settlements.																																									

**Any new options to be considered before Submission? No**

**Frontloading more housing in the trajectory:** This is considered unrealistic given the current economic situation and the necessary infrastructure that needs to dovetail with development.

**Phasing should relate to use of least valuable agricultural land:** This is considered unrealistic as many of the sites proposed for urban extensions do utilise high value agricultural land and other issues also affect delivery of these sites. PPS 7 states that where significant development of agricultural land is unavoidable, local planning authorities should seek to use areas of poorer quality land (grades 3b, 4 and 5) in preference to that of a higher quality, except where this would be inconsistent with other sustainability considerations. In the Core Strategy, areas of lower agricultural land value around particularly Hereford and Leominster are often subject to flooding and/or are considered of high landscape value which affects their developability.

**Detailed allocations not broad locations should be used:** This is considered unreasonable because of the delays to the Core Strategy timetable that would result in obtaining all the necessary further evidence and master planning of sites that would be required. The Hereford Area Plan and Market Towns and Rural Areas Plan will address master planning and site-specific development.

**Should windfalls be addressed in the housing figures?** This is not a new option, but is explained for clarity. Brownfield windfalls are addressed in the Strategic Housing Land Availability Assessment which will be used to produce the housing trajectory in the Core Strategy. Greenfield windfalls such as Barn Conversions which are a special case in Herefordshire, will be monitored throughout the plan period and accounted for in the trajectory at the end of the plan period. The Core Strategy will show that a 5 to 10 year supply of housing can be achieved.

**Should more priority be given to affordable housing?** This is considered unrealistic as the Affordable Housing Viability study has set a reasonable target for affordable housing delivery of between 25 and 40%. Any higher than this would render the provision of development unviable.

**Focus more development to brownfield land?** This is considered unrealistic. The preferred strategy refers to pursuing a sequential approach to development utilising brownfield land and buildings before greenfield, but acknowledges that the level of greenfield land will be higher than levels achieved in previous years due to the amount of growth proposed.

**Clarity on housing trajectory and phasing** - this will be provided in the final pre-submission version.

**Reduce housing numbers** - this option is not considered reasonable given the existing evidence supporting need and demand for housing and the late stage of plan production.

**Any new evidence required?**

Local Housing Market Assessment

<b>Question:</b> Do you agree with the proposals for new jobs	<b>Qu: No:</b> 4a/b
<b>Summary of Questionnaire responses (from associated report)</b> Total no. respondents 391 Yes - 225 (58%) Yes with minor changes - 89 (23%) No - 77 (20%)	
<b>Summary of free-write questionnaire comments received</b> As noted above just over 50% of respondents support the strategy for new jobs as drafted in the PSP. Of those not in agreement or seeking changes, the main reasons are outlined below	
Need greater emphasis in the strategy on the economy and job creation Need to focus on rural areas as well as Hereford and the market towns Not convinced so many new sites/jobs are needed Employment needs to be supported by infrastructure such as better transport and broadband Need greater support for small new and existing businesses More jobs/employment land needed generally Should focus on Moreton on Lugg Need greater clarity on how live-work units will be implemented Need greater focus on manufacturing Need to focus on use and promotion of sustainable technology Need greater ref to Kington and jobs Need careful monitoring Need more employment land in north Hereford Need more employment land in Leominster Strategy should not encourage large scale inward migration No ESG Need green travel plans	32 24 22 20 14 15 6 4 3 3 2 2 2 2 2 1 1
<b>Summary of responses from Stakeholders</b> <b>Natural England</b> - Support live-work <b>FOE</b> - Support live-work  <b>English Heritage</b> - Rural regeneration opportunities should be informed by Historic Farmsteads and Landscapes study when complete <b>Parish and Town Councils</b> - Generally supportive of proposals that are designed to facilitate the provision and development of small business start-ups in rural settlements. There is support also for the provision of employment land in close proximity to new housing. The proposal to encourage high-tech industries has been treated with scepticism by some Parish/Town Councils and many remain sceptical about the likelihood of businesses opening in Herefordshire given that the majority of sites are constrained by poor access etc. The Council has been urged by one Parish Council to clarify the meaning of the term 'better quality existing employment land'.	

**Any new options to be considered before Submission? No**

The suggestions to have change the amount of employment land allocations and/or to have more employment land allocations in Hereford, Leominster, Kington and Moreton-on Lugg were not considered to be reasonable options. The Employment Land Study has identified that generally there is a good supply of employment land in Herefordshire and its recommendations have been taken into account in the spatial strategy in terms of the allocation of new employment land.

The option to have strategic allocations in villages is considered unreasonable - no need has been identified in the Employment Land Study. Non-strategic sites may be identified through the Market Towns and Rural Areas Plan.

Many of the free-text comments raised concerns which have been addressed in the new policy on the economy or in the rural areas policies.

**Any new evidence required?**

None

<b>Question:</b> <b>Do you agree with the preferred strategy for new shops</b>	<b>Qu: No:</b> <b>5A</b>																																								
<b>Summary of Questionnaire responses (from associated report)</b>  Total number of Resposes: 381 Yes: 225 (59%) Yes with minor changes: 53 (14%) No: 103 (27%)																																									
<b>Summary of free-write questionnaire comments received</b>  As noted above, there is a level of support for the strategy. Of those not in agreement with the strategy or seeking minor changes, the main reasons for their decision are outlined below.  <table border="0" style="width: 100%;"> <tr> <td>No to ESG retail / revitalise shops in existing city centre / not to the detriment of city centre shops.</td> <td style="text-align: right;">25</td> </tr> <tr> <td>No need for Hereford to grow to extent proposed / not sustainable</td> <td style="text-align: right;">15</td> </tr> <tr> <td>Yes, but fill city centre shops first</td> <td style="text-align: right;">12</td> </tr> <tr> <td>City centre should be priority for shops</td> <td style="text-align: right;">10</td> </tr> <tr> <td>Yes, providing ESG brings new higher level retail</td> <td style="text-align: right;">10</td> </tr> <tr> <td>Increase provision of village / community / farm shops</td> <td style="text-align: right;">10</td> </tr> <tr> <td>More specialised / small shops to improve local distinctiveness</td> <td style="text-align: right;">9</td> </tr> <tr> <td>Out of centre development will have adverse effect upon city centre / businesses</td> <td style="text-align: right;">9</td> </tr> <tr> <td>Retain Herefordshire's individuality / protection of historic core / character</td> <td style="text-align: right;">9</td> </tr> <tr> <td>No to ESG retail as it will cause further traffic congestion</td> <td style="text-align: right;">8</td> </tr> <tr> <td>Support strategy as it will prevent leakage to other centres</td> <td style="text-align: right;">7</td> </tr> <tr> <td>Strategy takes no account of interner / retail decline</td> <td style="text-align: right;">6</td> </tr> <tr> <td>Keeps rents low / subsidy for independent / small retailers</td> <td style="text-align: right;">6</td> </tr> <tr> <td>More should be done for city centre - then ESG</td> <td style="text-align: right;">5</td> </tr> <tr> <td>More shops / priority to Market Towns</td> <td style="text-align: right;">5</td> </tr> <tr> <td>Support if coupled with improved transport system / car parks / park &amp; ride</td> <td style="text-align: right;">5</td> </tr> <tr> <td>Support for ESG as no other suitable site available in centre</td> <td style="text-align: right;">4</td> </tr> <tr> <td>Yes, need for more shops, better choice</td> <td style="text-align: right;">4</td> </tr> <tr> <td>No more supermarkets</td> <td style="text-align: right;">3</td> </tr> <tr> <td>Redevelop other areas of city</td> <td style="text-align: right;">2</td> </tr> </table>		No to ESG retail / revitalise shops in existing city centre / not to the detriment of city centre shops.	25	No need for Hereford to grow to extent proposed / not sustainable	15	Yes, but fill city centre shops first	12	City centre should be priority for shops	10	Yes, providing ESG brings new higher level retail	10	Increase provision of village / community / farm shops	10	More specialised / small shops to improve local distinctiveness	9	Out of centre development will have adverse effect upon city centre / businesses	9	Retain Herefordshire's individuality / protection of historic core / character	9	No to ESG retail as it will cause further traffic congestion	8	Support strategy as it will prevent leakage to other centres	7	Strategy takes no account of interner / retail decline	6	Keeps rents low / subsidy for independent / small retailers	6	More should be done for city centre - then ESG	5	More shops / priority to Market Towns	5	Support if coupled with improved transport system / car parks / park & ride	5	Support for ESG as no other suitable site available in centre	4	Yes, need for more shops, better choice	4	No more supermarkets	3	Redevelop other areas of city	2
No to ESG retail / revitalise shops in existing city centre / not to the detriment of city centre shops.	25																																								
No need for Hereford to grow to extent proposed / not sustainable	15																																								
Yes, but fill city centre shops first	12																																								
City centre should be priority for shops	10																																								
Yes, providing ESG brings new higher level retail	10																																								
Increase provision of village / community / farm shops	10																																								
More specialised / small shops to improve local distinctiveness	9																																								
Out of centre development will have adverse effect upon city centre / businesses	9																																								
Retain Herefordshire's individuality / protection of historic core / character	9																																								
No to ESG retail as it will cause further traffic congestion	8																																								
Support strategy as it will prevent leakage to other centres	7																																								
Strategy takes no account of interner / retail decline	6																																								
Keeps rents low / subsidy for independent / small retailers	6																																								
More should be done for city centre - then ESG	5																																								
More shops / priority to Market Towns	5																																								
Support if coupled with improved transport system / car parks / park & ride	5																																								
Support for ESG as no other suitable site available in centre	4																																								
Yes, need for more shops, better choice	4																																								
No more supermarkets	3																																								
Redevelop other areas of city	2																																								
<b>Summary of responses from Stakeholders</b>  <b>Holmer &amp; Shelwick Parish Council</b> Two sited development will have an adverse effect on city centre and local businesses  <b>Burghill Parish Council</b> Much more should be done for the 'main city' after that the ESG should be implemented																																									

**Clehonger Parish Council**

Do not agree with ESG. Through traffic should be taken along Roam Road not to Rockfield DIY. It is crazy to spend all that money on a new road and still bring it in to Edgar Street.

**Almeley Parish Council**

There are empty shops in each of the market towns and Hereford. Will customers be drawn to Hereford for shopping with well established competition in towns such as Cardiff and Cheltenham, with their road and rail access.

**Withington Parish Council**

There is a need to positively enhance retail provision in the market towns rather than just 'encourage'. Likewise this applies to villages.

**Little Birch Parish Council**

Is there evidence that as we come out of recession more shops will be required? Are peoples shopping habits changing? Possible some 'landmark' shops are required. High priority should be given to developing and uptake of existing empty shops before introducing more. Are high rents/taxes deterring possible incoming businesses?

**Middleton & Leysters Parish Council**

Much depends on Herefords ability to attract big retailers eg. John Lewis, Waitrose.

**Lower Bullingham Parish Council**

We support smaller shops, looking at ways of helping and supporting local shops.

**Stretton Sugwas Parish Council**

Clearly this set of proposals takes no account of the economic outlook or the change in retailing through the growth of 'online' shopping.

**Cradley Parish Council**

For Cradley, Worcester and Malvern are more attractive than Hereford for shopping. Further retail development in Ledbury might encourage Cradley residents to spend more money in the county.

**Bridstow Parish Council**

Community shops should be allowed if demand requires eg. In village halls etc.

**Natural England**

The Market Towns and Rural Areas Plan must stipulate the support the shops essential for the vitality of centres and hubs

**Any new issues to be considered in HAP or MTRAP:**

Ensure policies within the HAP address city centre regeneration. Develop policies that address linkage/integration of ESG and other areas proposed for new retail development. Address local distinctiveness historic retail core. Within rural areas address new retail opportunities that sustain local community needs.

**Any new options to be considered before Submission?**

Covered in the Hereford Preferred Options Paper

**Any new evidence required?**

Review retail assessment

<b>Question:</b>	
Do you agree with the preferred strategy for infrastructure	6a/b
<b>Summary of Questionnaire responses (from associated report)</b>	
Total no. respondents 405	
Yes 192 (47%)	
Yes with minor changes - 105 (26%)	
No - 108 (27%)	
<b>Summary of free-write questionnaire comments received</b>	
As noted above less than 50% of respondents support the infrastructure strategy as drafted in the PSP. Of those not in agreement or seeking changes, the main reasons are outlined below	
Need greater emphasis on water, sewerage, health, education and green infrastructure	63
Public transport improvements including greater investment in bus transport, cycle lanes and school buses should be concentrated on instead of relief road	60
Support for infrastructure proposed	48
Need to refer to what infrastructure investment is needed outside of Hereford	26
Need to refer to rail infrastructure	10
Just need second crossing not whole relief road	9
Need to clarify which infrastructure is critical to delivery of plan and show costs and phasing	8
Object to need	7
Need to emphasise that infrastructure delivery will be private sector led	5
<b>Other comments with less than 5 responses include concerns re:</b>	
Improve City centre first	1
Build relief road on stilts	1
Object to need for country parks	2

## **Summary of responses from Stakeholders**

**Natural England** - Questions need for relief road

**GOWM** - need to highlight critical infrastructure to deliver growth and evidence that will come forward in timely fashion

**Environment Agency** - need more detailed information

**Town and Parish Councils** - A number of views have been received by town and parish councils with the majority supporting the policy direction. Utilities and infrastructure were a source of disagreement in a number of responses. Developer contributions will be secured on developments to deliver the required utilities and infrastructure during the plan period. Views were received stating a need to improve hospital/health facilities. Herefordshire Council are in discussions with the health authorities and will be taken forward in the infrastructure delivery plan. Flooding was also a key issue and policies within the core strategy will halt development on flood plains and seek on-site flood alleviation schemes such as the use of SUDS.

**CPRE** - refer to water cycle strategy

### **Any new options to be considered before Submission?**

Concerns raised (as opposed to new options) will be addressed in text changes to this section in the Pre-submission Core Strategy and will also be addressed in the Implementation Plan

Alternative options involving no relief road - Not considered realistic and still achieve preferred strategy as relief road is fundamental in bringing forward sustainable transport improvements. But will need to add flexibility into the deliverability of the Core Strategy. This can be achieved by referring to the need for a review of the plan to be instigated through monitoring, if the

### **Any new evidence required?**

Economic Viability Study



## **Summary of responses from Stakeholders**

### **West Midlands Regional Assembly**

Consistent with policy PA1, the strategy proposes specific strategic employment development in Hereford, recognising the aim to ensure sustainable communities and an appropriate balance between homes and jobs. The environmental issues for Hereford identify the need to integrate new development into the countryside and surrounding landscape. Many of the growth options for Hereford are on sensitive landscapes and it is recognised that measures will need to be incorporated into these schemes to address this.

### **Government Office for the West Midlands**

Currently a Delivering a Sustainable Transport System (DaSTS) study is being carried out into Shrewsbury, Telford and Hereford Growth Point Connectivity with the objective to provide specific affordable recommendations for transport interventions. Funding, implementation and delivery arrangements for infrastructure will have to be clearly set out.

### **English Heritage**

We are supportive of the overall strategy for Hereford in its context of supporting its role as the sub-regional centre. The strategy should incorporate a specific environmental commitment, this including a clear statement on conserving and enhancing Hereford's historic character and setting.

### **CPRE**

Absence of environmental protection as a strategic matter. Extraordinary that an overall strategic statement should include no reference to the protection of its historic environment or the natural environment of open spaces within its boundary and natural setting.

## **Any new issues to be considered in HAP or MTRAP:**

Ensure policies within the HAP to integrate the city centre regeneration proposals within ESG and the historic retail core

Ensure urban extensions are integrated into the existing urban fabric and the surrounding countryside.

Investigate any health, social and community requirements for the urban extensions and Hereford as a whole

## **Any new options to be considered before Submission?**

Reference to affordable housing in Hereford should be mentioned.

Include more information on the importance of tourism to Hereford

Include more regarding Hereford's unique historical character and setting

**Any new evidence required?**

Review any tourism strategy for Hereford

Review the Urban Fringe Sensitivity Analysis, Green Infrastructure Strategy and Rapid Townscape Analysis to ensure environmental issues are addressed

Review the DaSTS Study and the Local transport Plan 3 to ensure any strategic sustainable transport measures are included

<b>Question:</b> Do you agree with the overall strategy for market towns	<b>Qu: Nu:</b> 8
--	---------------------

**Summary of Questionnaire Responses (from associated report)**

Total responses: 375  
Yes: 230 (61%)  
Yes with minor changes: 82 (22%)  
No: 63 (17%)

**Summary of free-write questionnaire comments received**

While 61% of respondents supported the policy, those seeking minor changes or not in favour of the policy had a variety of reasons and suggestions.

Contrasting views were submitted on whether the proposed levels of growth were appropriate with responses stating that too high and too little growth is proposed. The individual proposed levels of growth is based on robust evidence including analysing each sites environmental constraints, infrastructure levels and provision of existing services capable of supporting increased levels in growth. Too little growth and settlements may decline and lose services as they become no longer viable while too much growth could lead to unnecessary urban sprawl into the rural countryside, contrary to the aims of sustainability. The SHLAA has examined environmental constraints and identified locations where impact will be minimised and mitigation of impact and provision of green infrastructure will be required on all developments

Priority should be given to previously developed land (PDL). The SHLAA has identified an insufficient level of PDL to accommodate the required growth. As such greenfield land will be required during the plan period.

Employment growth before housing. The core strategy is proposing a balance in the provision of both housing and employment opportunities. Solely delivering employment opportunities without providing the necessary households will lead to high levels on commuters entering market towns which is unsustainable.

Improvements required to public transport, utilities, infrastructure and the provision of broadband. The above are priorities of the core strategy and new developments will be expected to provide new or contribute to improvements in infrastructure and utilities.

A one size fits all policy will not work. This is accepted by Herefordshire Council and specific site detail will be provided in the Hereford Area Plan and Market Towns and Rural Areas Plan.

Valued agricultural and recreational land should be protected. Noted, the SHLAA has examined a wide arrange of land constraints and the presence of important assets upon sites in order to identify the most suitable land parcels. Valued heritage assets and agricultural landscapes will be protected under the local distinctiveness policy.

Most development should be focused on Hereford rather than the market towns. The combined level of growth within all market towns is less than Hereford City.

### **Summary of responses from Stakeholders**

CPRE: Does not support the policy as there no reference to the protection of the important histoic and nautal environments of these towns. Issues regarding environmental and heritage assets have been examined within the SHLAA. Countywide policies on local distinctiveness will seek to protect and enhance such classifications with site specific details analysed as part of the HAP and MTRAP.

Natural England: Supports the policy with minor amendments. Questions the decision to focus most growth in Leominster and the benefits to congestion and air quality issues may only be short-term. Leominster is proposed to accommodate the highest level of growth for a number of reasons. The settlement is the largest market town in Herefordshire and is least constrained by environmental factors. There are severe air traffic and congestion issues with Leominster and there is no suggestion or evidence that the proposed mitigation methods will only have a short-term benefit.

West Midlands Regional Assembly: While no definitive answer is provided the free write does analyse the policy in line with the RSS which it is in general accordance.

English Heritage: Supports the policy with minor amendments. The overall strategy should include a statement on conserving and enhancing the distinctive character of the market towns. Commented noted however general strategic principles on local distinctiveness are contained elsewhere and site specific details will be analysed in the HAP and MTRAP.

Town and Parish Councils: Of those town and parish councils that responded to the PSP question, no responses were received disagreeing with the policy. The majority of respondents supported the policy subject to minor amendments with the issues and responses outlined above.

**Any new issues to be considered in the HAP or MTRAP:**

Review SHLAA and ensure no alternative sites are available.

**Any new options to be considered before Submission?**

No

**Any new evidence required?**

<b>Question:</b> Do you agree with the overall approach to Rural Areas?	<b>Qu: Nu:</b> 9 a) b)
<p><b>Summary of Questionnaire Responses (from associated report)</b></p> <p>Number of Responses: 376  Yes: 210 (56%)  Yes with minor changes: 99(26%)  No: 67 (18%)</p>	
<p><b>Summary of free-write questionnaire comments received</b></p> <p>As highlighted above, there was a high level of support for the overall approach to rural areas. Of the responses received, a number of key themes appeared.</p> <ol style="list-style-type: none"> <li>1. Though support was received, a number of respondents stated that there was a high need for increased affordable housing. The Place Shaping Paper prioritises the delivery of affordable housing and this can be delivered in all settlements.</li> <li>2. The success of the overall strategy is dependent upon the delivery of public transport. The identification of RSCs and Hubs is in areas of high accessibility and furthermore the Place Shaping Paper is promoting the re-opening of railway stations.</li> <li>3. The most common response was for the need of flexibility in the plan. This is covered through Option 2 of tier 2 settlements and following additional comments, the Rural Settlement Hierarchy will be revisited.</li> <li>4. The negative responses received focused around the RSCs being over-developed and losing character. The SHLAA examines site capacity as well as its constraints and it is accepted that not all settlements will be able to accommodate the level of growth referred to in the Place Shaping Paper. Furthermore, local distinctiveness policy is seeking to protect and enhance existing characteristics of settlements.</li> <li>5. In contrast a number of responses stated that the level of rural housing proposed should be increased to meet the objectives. Housing numbers are currently being analysed by central Government, however, the focus of growth must remain on the major settlements.</li> <li>6. The negative comments also stated there were large-scale areas of Herefordshire without a settlement able to accommodate growth. This is due to the designation of sites based on criteria rather than geographical location. However, option 2 of tier 2 settlements allows for flexibility of locations of development</li> </ol>	
<p><b>Summary of responses from Stakeholders</b></p> <p><u>WMRA:</u> While not providing a definitive answer, on the whole the WMRA comments supported the policy direction of the Place Shaping Paper as it is in accordance with the rural regeneration policies of the RSS. However, clearer links need to be highlighted between the LDF and Local Transport Plan.</p>	

CPRE: Supports the preferred option but would like greater effort to maintain the infrastructure and services in smaller settlements. Option 2 provides flexibility of development locations that could ensure long-term viability of smaller settlements.

Sport England: Supports the preferred option

Natural England: Supports the preferred option

Herefordshire Nature Trust: Supports the preferred option

Herefordshire Environment Partnership: Supports the preferred option

English Heritage: Supports the preferred option but wishes to examine its flexibility to meet with recent regional studies.

Parish/Town Councils: Of the Parish and Town Councils who submitted responses, there was a high level of support for the preferred strategy. Of importance to the Councils was the development of affordable housing and ensuring the viability of existing centres. Of those who did not support the preferred strategy, the key reason was the need for flexibility during the plan period. This is being taken forward in the review of the Rural Settlement Hierarchy.

**Any new issues to be considered in the HAP or MTRAP:**

As part of the consultation, a number of site specific representations were made. Site specific allocations will be detailed within the MTRAP.

**Any new options to be considered before Submission?**

No

**Any new evidence required?**

Though not new evidence, it is required to review the Rural Settlement Hierarchy following the comments received and make any necessary alterations.

<b>Question:</b> Are there any additional key issues in Hereford that should be addressed?	<b>Qu: No:</b> 10
<b>Summary of Questionnaire responses (from associated report)</b> Not applicable. Could not respond with a yes/no answer.	N/A
<b>Summary of free-write questionnaire comments received</b>	<b>No. of comments made</b>
(1) Improved transport infrastructure/new relief road/second river crossing.	42
<b>(2) More/better sports, leisure &amp; recreation facilities, especially for the young/youths.</b>	<b>37</b>
(3) Improved public transport/cheaper public transport/park & ride/school buses/rail etc	34
(4) Better cycling/walking facilities and good links from new housing developments.	19
(5) More/better quality shops & new buildings in existing town centre.	18
(6) More sustainability/green policies, especially sustainable homes & green infrastructure.	15
<b>(7) Lack of hospital capacity now &amp; especially if planned growth goes ahead.</b>	<b>14</b>
<b>(8) Improve/retain landscape/environmental assets/historic character/archaeology of Hereford.</b>	<b>13</b>
(9) More affordable housing/supported rented/housing for care workers/social rented to meet needs.	11
<b>(10) Better/increased tourist facilities &amp; attractions (especially related to agriculture/food production/canal).</b>	<b>10</b>
(11) Car parking - less charging, pay on exit, more car parks.	10
(12) More employment opportunities/more manufacturing.	9
(13) Too much new development/housing.	9
(14) No relief road or other new roads.	9
(15) New university/schools/improved education facilities.	8
(16) Increased use of brownfield sites and underused space over shops for housing and employment.	6
(17) Deliverability of housing/ESG - how will this happen in economic downturn?	6
(18) New cinema.	5
(19) No ESG/Link Road.	5
(20) Stress importance of agriculture/niche market in agricultural food products.	4
(21) Need better infrastructure in terms of drains, water, energy supplies etc before development takes place.	4
<b>(22) More allotments.</b>	<b>3</b>
(23) Promote use of River Wye for leisure/tourism e.g. boat trips.	3
(24) More houses with larger gardens.	3
(25) Improved flood defences.	3
(26) Improve edge of city employment sites, in terms of appearance.	2
(27) MMMFR is not independent and is therefore not reliable (JMP work for Bloor/Church Commissioners).	2
(28) No new university.	1
(29) Alter description of 'community facilities'.	1
(30) No more shops, especially supermarkets.	1
(31) Pedestrian road crossing needed on Roman Road by Kempton Ave.	1
(32) CS needs to identify smaller housing sites to meet residential needs in first 5-10 yrs of plan period.	1
(33) Racecourse should be developed for housing.	1
(34) What happens if there is no bypass.	1
(35) Focus more manufacturing in towns with better transport links (e.g. Ross/Ledbury).	1
(36) Get private firm to take over the plan making process.	1
(37) Need better explanation of impacts of housing growth.	1
<b>(38) Rectify social problems south of the river.</b>	<b>1</b>
<b>Summary of responses from Stakeholders</b>	
<b><u>TOURISM &amp; LEISURE</u></b>	
<b>Ledbury &amp; District Civic Society</b> Increase role of tourism. Make city centre attractive & welcoming to visitors, regeneration of certain areas.	
<b>Longtown Group Parish Council</b> Increase use of River Wye for leisure.	
<b><u>PROTECTION OF ENVIRONMENT, LANDSCAPE, CONSERVATION INTERESTS &amp; HISTORIC ASSETS</u></b>	
<b>National Trust</b> The scenic and tranquil qualities of the River Wye near Hereford should be further recognised (beyond their nature conservation designation) as a high quality environmental asset to be protected and enhanced.	
<b>Herefordshire Archaeology - Herefordshire Council</b> The character of the historic environment & the landscapes immediately surrounding Hereford are inadequately taken into account. Need a more imaginative approach to promoting environmental & historic assets of Hereford.	
<b>Brockhampton &amp; Much Fawley Parish Council</b> Involve residents in maintaining the balance between conservation & modern developments.	
<b>Arrow Valley Residents Association</b> Develop Hereford in harmony with its existing character.	
<b>Wye Valley Society</b> Hereford's historic centre & its facilities should be protected.	

## **IMPROVED ROAD INFRASTRUCTURE/RELIEF ROAD NEEDED/BETTER PUBLIC TRANSPORT/CAR PARKING**

### **Welsh Newton & Llanrothal Group Parish Council**

Need more investment to improve the existing road network.

### **Aymestry Parish Council**

Better transport links & a second river crossing needed.

### **Belmont Rural Parish Council**

Transport improvements to reduce queues of traffic are needed for growth to work. An eastern relief road close to the city's edge, which makes use of the improved Roman Road would save costs and reduce delays.

### **Almeley Parish Council**

Increase park & ride and 'hoppa' buses to reduce reliance on cars.

### **Withington Parish Council**

Need a relief road and second river crossing.

### **Wellington Parish Council**

It is imperative that the road infrastructure is updated to support businesses & their customers.

### **Cycle Hereford**

Lack of clarity on the impacts of growth on the transport network. Climate change and oil depletion should be further stressed.

Reduction on car dependency in the city should be one of the issues identified for Hereford.

### **Holmer & Shelwick Parish Council**

Car parking is an issue of concern.

## **OUTER RELIEF ROAD CONCERNS**

### **National Trust**

Serious concerns about Outer Distributor Road, in respect to the principle of it and of threats to land in the NT's ownership.

### **Cycle Hereford**

MMMFR use is objected to as it is not a certain picture of the future, merely a picture of what could happen under a set of assumptions. The methodology does not allow for management of travel demand through transport policy.

## **FLOOD MANAGEMENT**

### **Environment Agency**

Development in Hereford should avoid areas prone to flooding, as per SFRA. Need Flood Management Plan for ESG area to ensure that regeneration is in line with PPS25 & does not increase flood risk.

### **Natural England**

All new development & regeneration of existing sites should minimise & offset environmental negatives. DaSTS objectives should be followed. Upstream land use & management changes should be pursued to enable flood water attenuation & storage, reducing the impact of flooding on city & enabling biodiversity & landscape gains. This & on or off-site SUDs should be pursued through developer contributions.

## **COMMUNITY INFRASTRUCTURE**

### **Sport England**

Up to date playing field and sports strategy.

### **SHYPP Kemble Housing Association**

Increase services, and activities that attract young people & encourage them to stay.

### **Hereford City Council**

More youth enhanced facilities. The actual needs of the people & local economy should be planned for. More allotments needed.

### **The Theatres Trust**

For clarity & certainty of intended outcomes, use the following description of 'community facilities': they provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community.

## **LEVEL OF HOUSING GROWTH/DEVELOPMENT**

### **Hereford City Council**

With the economic downturn, the proposed building targets are optimistic. There is significant uncertainty in the housing market and a more flexible approach to new housing is needed.

### **Cycle Hereford**

Planned housing growth is not 'required', but 'sought'.

## **EMPLOYMENT**

### **Holmer & Shelwick Parish Council**

Employment is identified as an issue of concern.

### **Burghill Parish Council**

New housing growth should be employment led.

### **SHYPP Kemble Housing Association**

Need more employment opportunities that attract young people & encourage them to stay.

## **LINKS TO PROWS**

### **Herefordshire Local Access Forum**

New developments should have direct links to the PROW network.

### **Bridstow Parish Council**

New development should have links to the PROW network.

## **ESG**

### **West Mercia Police**

Concern expressed over the ESG regeneration proposals and Essex Arms playing field. This site is preferred for a new Hereford Divisional Headquarters and is therefore in conflict with ESG.

### **Wye Valley Society**

Link Road/ESG proposals should be shelved.

## **HOSPITAL CAPACITY CONCERNS**

### **Putson Community Association**

Hospital capacity too small & Stonebow inadequate for existing population.

## **EDUCATIONAL NEEDS**

### **Children & Youth Services, Herefordshire Council**

Sets out the pre-school, primary school & secondary school requirements that would result from the expected housing growth.

### **SHYPP Kemble Housing Association**

Increase/improve educational facilities to attract young people & encourage them to stay.

## **CITY CENTRE RETAIL**

### **SHYPP Kemble Housing Association**

Empty city centre shops need to be developed.

## **Any new issues to be considered in HAP or MTRAP:**

- > Are there any existing shortfalls in sports facilities & recreational/leisure facilities? Where? What will be the impacts of proposed growth be on demand and need?
- > Need to plan for any additional needs for health facilities in the future.
- > Need to stress the need for protection of the historic character of Hereford City.
- > Need to stress importance of tourism, including leisure attractions and importance of River Wye as an attraction.
- > Are there sufficient allotments to meet existing & future demand? Is there a need to allocate sites for new allotments?
- > (officer identified) Is there sufficient cemetery space in Hereford for the future growth of the City?
- > Improvements to South Wye area of Hereford and any other areas of deprivation identified.

## **Any new options to be considered before Submission?**

N/A

## **Any new evidence required?**

Refresh of Open Space Study.  
Playing Pitch Strategy required.  
Sports Facilities Framework study underway. Due Summer 2010.  
Study into Health Facility Requirements required.  
Study into Tourism facilities and attractions required, or specific Tourism Strategy.  
Study into demand for and provision of allotment space in Hereford required.  
Study into future needs for cemetery space in Hereford required.  
HEDIDS needs to be completed.  
Rapid Townscape Assessment needs to taken into account.  
Urban Fringe Sensitivity Analysis now complete & needs to be taken into account.  
Green Infrastructure Study next stage needs to be completed.  
Building Biodiversity into Herefordshire LDF Framework needs to be taken into account.  
Amey Hereford Relief Road Study to be completed and addressed.  
Local Housing Market Area Assessment study needs to be completed and addressed re: affordable housing.

<p><b>Question:</b> Do you agree with the preferred options for the urban area of Hereford Please explain any changes or thing you do not agree with and why</p>	<p><b>Qu: No:</b> <b>11a</b> <b>11b</b></p>
<p><b>Summary of Questionnaire responses (from associated report)</b></p> <p>Total number of responses; 329 Yes: 156 (47%) Yes with minor changes: 76 (23%) No: 97 (29%)</p>	
<p><b>Summary of free-write questionnaire comments received</b></p> <p>As noted above, there is a level of support for the strategy.</p> <p>1. Of those who responded 'yes with a minor change', the following are the most popular changes requested.</p> <p>28 were supportive but not to detriment of existing shopping centre 11 were supportive if retail element was removed 10 requested more housing being provided 8 requested better/sustainable design/maintenance 8 requested more support for tourism/culture 7 supported but not with the link road 7 supported but only if joined with existing centre 6 requested more affordable housing 5 requested more car parking 4 identified other areas for redevelopment (Berrington St. area) 3 questioned the need/location for more offices 3 supported maintaining/creating new links and greenspace</p> <p>note: some of the above were 'supports' from a 'No' response.</p> <p>2. Of those who responded 'No', the following are the most popular reasons.</p> <p>24 no need for another shopping mall/not sustainable 20 improve/regenerate current centre, retain historic core 20 alternative transport system required/alternative modes 16 disagree with relief road 6 too much development 5 it will create two competing centres 5 no need for further housing /only affordable housing 4 flood issues</p>	

## **Summary of responses from Stakeholders**

### **Natural England**

Welcome proposed sustainable transport improvements, country park and important city centre green infrastructure connection. Flood alleviation works for the urban village should be complimented by upstream land use floodwater storage/run off control on the Widemarsh Brook which would enhance its GI contribution.

### **Herefordshire Friends of the Earth**

Do not accept status of Hereford as a Growth Point. Most of the infrastructure needs arise only from additional unnecessary/unwarranted house building. The type of housing which is actually needed now and in the future, could be sustainably constructed and located in such a way that the outer distributor road would not be needed. Urban village should have more employment by relocating existing businesses within the area (co-locating homes and jobs).

### **H & W Chamber of Commerce**

Members confirm that attracting new talent to the city/county is difficult, mainly due to social factors – lack of varied night time economy, availability of starter homes. Policies must address these issues.

### **CPRE**

Support the principle of central area regeneration without necessarily agreeing with the particular location and balance of development that the Council may propose.

### **Ledbury & District Civic Society**

ESG is an overdevelopment with no guarantee of its success as a retail centre.

### **Hereford Civic Society**

This must have a profound effect upon the scale of any development or regeneration plans for Hereford and upon the relation between a city so developed and the market towns. The policy of building a central retail metropolis in the county town, designed to attract so many shoppers and much traffic from far and wide runs directly counter to these principles. Such a policy is contrary to PPS4 which encourages sustainable economic growth in towns and villages. HCS notes that ESG is not specifically mentioned or assigned a chapter.

### **West Midlands Regional Assembly**

Hereford is identified as a tier 3 centre in WMRSS Preferred Option policy PA11. The preferred spatial strategy for Hereford recognises the town centres role as a sub-regional centre and specifically references to retail, office and leisure development (5.24). Strategy omits to reference the specific levels of comparison retail floorspace in policy PA12A. Furthermore it is not identified as a key issue in Section 6.2 (Hereford) and it is unclear in the city centre redevelopment box (p.26) if this provision can be delivered. The strategy omits to reference Herefords regional office development requirements under policy PA13A and is therefore unclear whether the 45,000sq. m.gross of new office space can be delivered within or on the edge of the city centre. Secondly, whether the delivery of provision should be clearly established in the Core Strategy or whether it is being inappropriately devolved down to the Hereford Area Plan.

### **Ledbury Town Council**

Urban redevelopment of Hereford should not be done to the detriment of existing development.

### **Longtown Group Parish Council**

Only if the centre of Hereford is not destroyed.

### **Ross Town Council**

Not convinced of plans to radically alter shopping areas in Hereford.

### **Lower Bullingham Parish Council**

The proposed houses referred to at Bullinghope are actually in Lower Bullingham. In respect of traffic evidence, the road infrastructure in Lower Bullingham and Putson is at full stretch as is sewerage capacity. There is no evidence that alternative roads are proposed for new homes. Lower Bullingham Lane/Hoarwithy Road are unsuitable with severe congestion on A49. Need for affordable housing. The need for houses is probably developer led rather than need led. Support for more local shops/businesses promoting Herefordshire.

### **Burghill Parish Council**

Ensure that existing shop buildings are enhanced and utilised in keeping with Herefords market town history. Need for more car parking for the elderly near the centre. Park and ride not the answer for pensioners.

### **Brockhampton and Much Fawley Parish Council**

Housing and economic development should tie in with the preferred east route for the ring road.

### **Almeley Parish Council**

ESG should be linked to the town centre.

**Breinton Parish Council**

Herefordshires growth is down to in-migration, 25% of which are from overseas. We do not understand why the Council should be agreeing to accommodate people from out of the county at the expense of the permanent loss of quality agricultural land needed to help feed the nation.

**Hereford City Council**

In order to accommodate 8,500 houses this sizeable expansion will need to be supported by enhanced employment opportunities and infrastructure and unless these conditions are met, it is felt that Hereford citizens will not readily accept such a large and rapid expansion.

**Holme Lacy Parish Council**

Concerns about a two-town centre which means a poor overall town centre

**Little Birch Parish Council**

The cattle market site should be redeveloped but only if there is majority public support for the scheme.

**Much Birch Parish Council**

Doubts about ESG. Local opinion in rural areas is deeply divided. Many people are unconvinced of the feasibility of creating a new centre without excessively affecting High Town. Neither are people convinced that the two centre can be joined realistically.

**Any new issues to be considered in HAP or MTRAP:**

Ensure policies within HAP address city centre regeneration. Develop policies that address linkage/integration of ESG and other areas proposed for development. Address local distinctiveness, historic retail core, Address sustainable transport measures.

**Any new options to be considered before Submission?****Any new evidence required?**

Re-investigate office demand in light of RSS revocation.  
LTP3 particularly sustainable transport measures

<p><b>Question:</b> Which of the options for sustainable transport measures do you prefer? Which of the sustainable transport measures do you favour the most, or are there other measures that could be considered ?</p>	<p><b>Qu: No:</b> 12a  12b</p>																																																
<p><b>Summary of Questionnaire responses (from associated report)</b></p> <p>Total number of responses: 270 Option 1: 77 (29%) Option 2: 96 (36%) Option 3: 97 (36%)</p>																																																	
<p><b>Summary of free-write questionnaire comments received</b></p> <p>As noted above, there is a no clear preferred option for sustainable transport measures although option 2 and 3 are slightly favoured over option 1.</p> <p>Many respondent used this question not only to highlight preferred sustainable transport measures but also to query the need for the Hereford Relief Road and the evidence that sustainable transport measures alone will not solve Hereford's traffic issues.</p> <p>The following sustainable transport measures were highlighted as the preferred.</p> <table data-bbox="145 1093 1402 1928"> <tr><td>More Cycle / walking routes / facilities</td><td>57</td></tr> <tr><td>Park and Ride</td><td>57</td></tr> <tr><td>Improved bus services/ bus lanes</td><td>39</td></tr> <tr><td>Improve trains and dual track</td><td>21</td></tr> <tr><td>20 mph zones</td><td>13</td></tr> <tr><td>Coordination between bus and rail</td><td>11</td></tr> <tr><td>Parking on outskirts</td><td>10</td></tr> <tr><td>School buses/ walking buses</td><td>10</td></tr> <tr><td>Car free schools</td><td>9</td></tr> <tr><td>New stations</td><td>8</td></tr> <tr><td>Metro / tram</td><td>6</td></tr> <tr><td>Smart tickets</td><td>6</td></tr> <tr><td>Pay on exit parking</td><td>5</td></tr> <tr><td>Cycle hire</td><td>5</td></tr> <tr><td>No on street parking or charging to parking</td><td>5</td></tr> <tr><td>Electric cars / plug in points</td><td>3</td></tr> <tr><td>Increase parking charges</td><td>3</td></tr> <tr><td>Work place charging</td><td>3</td></tr> <tr><td>Free / reduced parking</td><td>2</td></tr> <tr><td>Car sharing</td><td>1</td></tr> <tr><td>Remove traffic lights</td><td>1</td></tr> <tr><td>Park and Rail</td><td>1</td></tr> <tr><td>Parking hubs</td><td>1</td></tr> <tr><td>More parking in city</td><td>1</td></tr> </table>		More Cycle / walking routes / facilities	57	Park and Ride	57	Improved bus services/ bus lanes	39	Improve trains and dual track	21	20 mph zones	13	Coordination between bus and rail	11	Parking on outskirts	10	School buses/ walking buses	10	Car free schools	9	New stations	8	Metro / tram	6	Smart tickets	6	Pay on exit parking	5	Cycle hire	5	No on street parking or charging to parking	5	Electric cars / plug in points	3	Increase parking charges	3	Work place charging	3	Free / reduced parking	2	Car sharing	1	Remove traffic lights	1	Park and Rail	1	Parking hubs	1	More parking in city	1
More Cycle / walking routes / facilities	57																																																
Park and Ride	57																																																
Improved bus services/ bus lanes	39																																																
Improve trains and dual track	21																																																
20 mph zones	13																																																
Coordination between bus and rail	11																																																
Parking on outskirts	10																																																
School buses/ walking buses	10																																																
Car free schools	9																																																
New stations	8																																																
Metro / tram	6																																																
Smart tickets	6																																																
Pay on exit parking	5																																																
Cycle hire	5																																																
No on street parking or charging to parking	5																																																
Electric cars / plug in points	3																																																
Increase parking charges	3																																																
Work place charging	3																																																
Free / reduced parking	2																																																
Car sharing	1																																																
Remove traffic lights	1																																																
Park and Rail	1																																																
Parking hubs	1																																																
More parking in city	1																																																

The following were highlighted as not preferred

Increase parking charges	26
Park and Ride	1
Relief Road	1
Restrict car to evening only	1
Restrict business access to centre	1
20mph zones at schools	1
Congestion charge	1
Over emphasis on cycling	1
On street charging	1

## Summary of responses from key Stakeholders

### Hereford City Council

The economic case has yet to be established for a park and ride and recent plans showcased proved to be unpopular. Park and Ride could only be sustainable when clearly linked to an existing link road with dedicated bus priority schemes and reduction in inner city parking. 47% of city carparks are privately owned.

### Hereford and Worcester Fire and Rescue Service

Careful consideration needs to be given to the capacity of the existing road network to manage the increase in road use in order to ensure that the Service's ability to reach incidents is not compromised. The increase use of pedestrian, cyclist and public transport routes is encouraged but need to ensure that new routes do not restrict the ability of emergency vehicles to reach incidents.

### Government Office for the West Midlands

Clear funding sources have yet to be identified for a possible Relief Road. If a core Strategy policy / proposal is not deliverable because it is not economically viable it should not be in the Core Strategy. A DaSTS Study is being carried out with the objective to provide specific affordable recommendations for transport interventions.

### West Midlands Regional Assembly

Enhanced walking and cycling routes where appropriate to new developments, linking existing routes and encouraging green infrastructure and extended public rights of way. Encourage travel plans for urban extensions.

### Highways Agency

In recognising the ambitions by when Herefordshire is seeking to adopt its Core Strategy, the HA is now keen to progress discussions and work on developing a package of effective and deliverable sustainable transport measures.

**Any new issues to be considered in HAP or MTRAP:**

There were no specific new ideas highlighted which could be influenced via the planning process

Any sustainable transport measures for Hereford will be included within the Local Transport Plan 3 and/or the Hereford Area Plan

**Any new options to be considered before Submission?**

Consider the possibility of including strategic Park and Ride sites within the urban expansion areas.

**Any new evidence required?**

Update on the Park and Ride Study and findings from the Local Transport Plan 3 consultation

Updates from the Delivering a Sustainable Transport System (DaSTS) Study

Updates from the Multi-Modal Model including traffic modelling including a package of sustainable transport measures.

Review Hereford Relief Road Study

<b>Question:</b> Which urban expansion option do you prefer? Is there another combination of the suggested locations which could form an appropriate and realistic alternative option?	<b>Qu: No:</b> 14a 14b
<b>Summary of Questionnaire responses (from associated report)</b>  Total number of responses: 291 Option 1 (North western Focus): 44 (15%) Option 2 (South western focus): 50 (17%) Option 3 (North south focus): 89 (31%) Option 4 (Dispersed option): 108 (37%)	
<b>Summary of free-write questionnaire comments received</b>  As noted above, there is a no clear preferred option but options 3 and 4 were the favoured. Of those making comments specific to the urban expansions the following were made.	
Need for more affordable housing	13
Quering need for road and preference for sustainable transport measures only	12
Queries regarding the level and need for growth	11
Environmental issues, setting of Hereford	9
Additional sites or options highlighted (see below)	9
Need for relief road and/or river crossing	8
More homes to either the market towns, 5miles around Hereford or countywide	5
More homes to the east	4
Brownfield land	4
No homes in south	3
Include the racecourse	3
More homes and employment in the south	3
No homes at Holmer	2
Bring more empty properites back into use	2
Too many homes proposed in the west	2
Need more infrastructure	2
More homes on ESG	1
Balance homes and employment	1
Need for high architectural merit	1
Employment in Moreton-on-Lugg	1
More organic dispersal	1
Need surface water management plans	1
Water supply issues need addressing	1
Combine the racecourse and the Livestock Market	1
Too much affordable housing	1
Retain the racecourse	1

## **Summary of responses from Stakeholders**

### **Natural England**

Although the SA considers Option 4 to be neutral and the other three options to be moving towards sustainability, we believe that the dispersed pattern offers clear benefits.

### **Environment Agency**

Sites proposed are predominantly located in Flood Zone 1, However due to the scale proposed and the increase in hardstanding, development in these areas will need to be assessed in detail to ensure no increase in flood risk post development. Recommend the Council produces a Surface Water Management Plan (infrastructure) for these areas to ensure that the urban expansion does not result in increased run off affecting the developments or third parties.

### **Hereford and Worcestershire Chamber of Commerce**

The Chamber cannot feedback a preferred option in relation to the urban expansion. However, it is felt that Holmer East allocation does form an employment corridor down the A49, which then changes into large retail and into the city centre. The flow of traffic and transport connectivity to the site is good whether the bypass goes east or west.

### **English Heritage**

Welcome the application of the HEDIDs study to help inform the development options and sustainability appraisal. Opportunities for development within the existing urban area should remain under review so that wider regeneration objectives can be supported.

### **Holmer and Shelwick Parish Council**

Better balance of location of employment and housing

### **Breinton Parish Council**

Eastern side of Hereford more suitable for development, more schools, colleges, closer to Worcester. Road to the east would link main employment site. Already bridges in the west. Need more green space in the west.

### **Friends of the Earth**

Would prefer the analysis to be undertaken without the assumption of a major road, so it is hard to comment on the given options. Since most of the housing is required only to fund the relief road, none of these options is necessary.

### **Stretton Sugwas Parish Council**

None of the above, they all create potential for too much social housing in areas we don't want.

**Any new issues to be considered in HAP or MTRAP:**

The design aspects of the urban expansion sites to ensure integration into the surrounding urban fabric and the surrounding countryside

Need for any additional employment land at Rotherwas for employment

The use of empty homes for additional housing

**Any new options to be considered before Submission?****Church Commissioners, Boyer Planning and Hunter Page**

Consideration of 5th Option to phase development over two plan periods and increase the total number of housing to enable viability

**CPRE**

Option to include development at Holmer, Urban Village and the Racecourse

**Bull Partnership**

Option to include half homes to Rotherwas and half to north/west

**Alder King**

Option with development to the south

**Any new evidence required?**

Economic Viability Study

Review Urban Fringe Sensitivity Analysis, Green Infrastructure Strategy and Building Biodiversity

Review Employment Land Study

Review Hereford Relief Road Study

Investigate safeguarded mineral reserves

<b>Question: 16 Bromyard</b>	<b>Qu: No: 16</b>
------------------------------	-----------------------

**Summary of Questionnaire responses (from associated report)**

There were 70 responses in all to this question with many of the issues raised for consideration in the Market Towns and Rural Areas Plan

**Summary of free-write questionnaire comments received**

Better sports/play facilities	9
Better public transport	9
Better public footpaths	9
More cycle tracks	8
Water park	5
Support for town centre regeneration especially independent shops and reopen empty shops	4
Review Linton employment site proposal	4
Swimming pool	3
More tourism	3
Increase housing target	3
Impact on car parking	3
Support for proposals	2
Should consider the south of the town for residential development	2
Need for affordable homes for local people	2
Need for a relief road to Porthouse Farm area	2
Need for a north/south road access	2
Better designed quality family housing	2
Support for Linton site	2
Subdivision of larger homes	1
Review existing industrial sites	1
No diversification of economic base	1
New library	1
Need to improve ecological condition and recreational use of Bromyard Downs	1
Need another large food store	1
More jobs	1
More high tech industry	1
Improvements to sewerage works required	1
Impact on medical/dental facilities	1
Bromyard Conservation area is at risk	1

**Summary of responses from Stakeholders**

**Natural England:** Improve the ecological condition and recreational use of the Bromyard Downs to accommodate increased population use.

**Bromyard Market Town Plan Committee, Bromyard Regeneration Partnership:** Affordable housing is necessary. Improvements to sewerage works needed. Car parking is a major problem and 4 suggested sites have been put forward.

**Bromyard and Winslow Town Council:** Need a relief road near Petty Bridge to access the industrial estate. No need to diversify the economic sector. Need for further employment opportunities.

**Bromyard and District Chamber of Commerce and Industry:** Quote median house price values alongside mean. Refer to connectivity as a key issue. Review existing industrial areas.

**Cradley Parish Council:** Bromyard does not entice visitors from rural hinterland

**Herefordshire and Worcestershire Chamber of Commerce:** Land to the West of Linton and Porthouse Farm does have employment land potential.

**English Heritage:** Concern regarding visual integration with built up area and landscape. Bromyard Conservation area was identified as at risk in the Heritage at Risk Register.

**Herefordshire Council, Head of Access and Commissioning:** With 300 dwellings, need for 15ft places for 2-4 year olds with potentially two buildings. Primary and high schools have capacity but need investment to replace temporary accommodation.

**Sport England:** An up to date playing field and sports strategy

#### **Any new issues to be considered in HAP or MTRAP:**

Bromyard Conservation area was identified as at risk in the Heritage at Risk Register 2009.

Rewording of point 1. in Economic Issues pg45 diversifying the business base.

Improve access including footpaths and cycle paths

Improve the ecological condition and recreational use of the Bromyard Downs to accommodate increased population use.

Poor north/south road links

Quote median value alongside mean value for house prices

Need for better public transport provision

New library

#### **Any new options to be considered before Submission?**

Linton employment site review

#### **Any new evidence required?**

Refresh of the Employment Land Study

Refresh of the Retail Study

Green Infrastructure Strategy

HEDDIS

**Question: 17a & 17b Bromyard****Qu: No:****Summary of Questionnaire responses (from associated report)****Q17a**

Of 92 people who chose an option, 13% voted for Option 1 which proposed development to the north of Bromyard whilst a greater amount of people 39% voted for Option 2 (development to the west of close to the the A44). The largest share of the vote was for Option 3 with 48% which proposed development in the north west of the town.

There were 45 responses in all to this question with many of the issues raised for consideration in the Market Towns and Rural Areas Plan

**Summary of free-write questionnaire comments received**

Do not Develop Land to east of Linton Trading Estate	4
Support for proposals	3
Option 3 is preferred as it includes a new formal park, the landscape sensitivity is less and it integrates better with the dispersed allocations on the urban edge of Bromyard	2
Need for a relief road to Porthouse Farm would entice industrial developers	2
Develop the Porthouse site for employment	2
Better pedestrian access	2
Lack of recreational facilities	2
There is an oversupply of industrial land	1
The Leominster Road housing site Option is is too visible and there is a high recorded level of prehistoric activity	1
Take a dispersed approach to development	1
Should consider the south of the town for residential development	1
Risk of flooding from River Frome	1
Option 3 brings the most green infrastructure	1
Opposed to housing development due to Bromyard's poor communication	1
Opportunities to enhance the River Frome should be promoted alongside new development	1
No need for a new employment site, refurbish the existing site at Linton	1
Need for eastern A44 improvements	1
Need for an assessment of the housing land to ensure that there is no increased risk of flooding through a Surface Water Management Plan	1
Need for a north/south or north/west road link	1
Need an overnight lorry park	1
Impact on car parking	1
Homes should be near jobs	1
Historic field patterns of Hardwick Bank which is an option for housing growth should be preserved	1
Development will only have a negative impact on global warming and emissions	1

Consider needs of families occupying new housing	1
Concern over the level of infrastructure required with an increase in housing	1
Bromyard needs more housing	1
Better vehicle access to the Hope Centre	1
Better cycle access	1
Better access to the Worcester Ring Road	1
Avoid severance of the A44 for new housing	1
A hybrid of Options 2 & 3 would enable easy access on to the A44 with a new link road	1

**Summary of responses from Stakeholders**

**Environment Agency:** The land where the three Options are proposed will need significant assessment to ensure that there is no increased risk of flooding through a Surface Water Management Plan

**Herefordshire Council, Archaeology Department:** Historic field patterns of Hardwicke Bank which is an option for housing growth should be preserved. The Leominster Road housing site Option is too visible and there is a high recorded level of prehistoric activity

**English Heritage:** Welcome the HEDIDs study as it informs the Options and interested in its progress for the MTRAP.

**CPRE:** All the options involve development on high sensitivity landscape. The MTRAP should identify smaller and less sensitive plots for housing development and not the Core Strategy.

**Natural England:** a new park should draw upon the recommendations of the Council's Green Infrastructure Strategy (GIS). Opportunities to enhance the River Frome as a strategic green infrastructure corridor in line with the GIS should be promoted.

**Bromyard Market Town Plan Committee:** Concern over the infrastructure necessary to accommodate new development including sewerage and broadband services. Consider family needs in new developments.

**Any new issues to be considered in HAP or MTRAP:**

The land where the three Options are proposed will need significant assessment to ensure that there is no increased risk of flooding through a Surface Water Management Plan

The historic field patterns of Hardwicke Bank which is an option for housing growth should be preserved. The Leominster Road housing site Option is too visible and there is a high recorded level of prehistoric activity.  
(Depending on Option chosen for Core Strategy)

Need an overnight lorry park

Need for eastern A44 improvements

**Any new options to be considered before Submission?**

Review the employment land option

**Any new evidence required?**

Refresh of Employment Land Study

Refresh of the Retail Study

Green Infrastructure Study

HEDDIS

<b>Question: 18 Kington</b>	<b>Qu: No: 18</b>
-----------------------------	-----------------------

**Summary of Questionnaire responses (from associated report)**

There were 62 responses in all to this question with many of the issues raised for consideration in the Market Towns and Rural Areas Plan

**Summary of free-write questionnaire comments received**

Improve the appearance and character of the town centre	6
Encourage a more diverse employment base to enhance job opportunities	5
Potential for the town to focus on higher skilled employment	3
Kington has limited capacity for new development	3
Better public transport	3
Town centre should not have traffic going through it	2
More affordable homes	2
Lack of sports facilities	2
Kington needs some development as there is a risk it will get left behind	2
Kington has potential to be a tourist attraction	2
Working from home should be catered for	1
Sustainable design standards for new build	1
Sewers and water supply system needs improvement	1
Restore the cottage hospital	1
Potential for the town to provide a link between protecting heritage and incorporation of renewable energy e.g solar panels on listed buildings	1
Need a better mix of house size	1
Maintain existing infrastructure	1
Less drugs	1
Kington does not have enough to retain the young	1
Kington conservation area at risk	1
Independent shops are a strength	1
Identify land close to the town centre for community facilities and services instead of housing	1
Ensure sufficient services are maintained	1
Encourage Kington's potential as a good area for walking	1
Consider residents off road parking	1
Concern for water quality of the River Arrow	1
A44 from Kington to Leominster is a bad road	1

**Summary of responses from stakeholders**

**English Heritage:** The Heritage at Risk Register 2009 shows Kington conservation area at risk. Consider how new development can be incorporated into the town centre to support and strengthen regeneration objectives.

**Aymestry Parish Council:** Kington has the potential to be a major centre for walking but needs to do more to achieve this

**Herefordshire Council, Head of Access and Commissioning :** 50 dwellings Minimal impact. Capacity in Bromyard schools to provide for additional numbers, but may need capital investment to replace temporary accommodation and make fit for purpose some current accommodation which, without impact of additional housing, would be decommissioned.

**Sport England:** Up to date playing field and sports strategy

**Ross Town Council:** Kington is very run down with poor shops and it has declined in recent years.

**Any new issues to be considered in HAP or MTRAP:**

Consider how new development can be incorporated into the town centre to support and strengthen regeneration objectives.

50 dwellings Minimal impact. Capacity in Bromyard schools to provide for additional numbers, but may need capital investment to replace temporary accommodation and make fit for purpose some current accommodation which, without impact of additional housing, would be decommissioned.

Kington has potential to be a tourist attraction

Encourage a more diverse employment base to enhance job opportunities

Lack of sports facilities

**Any new options to be considered before Submission?**

No

**Any new evidence required?**

Refresh of Employment Study

Refresh of Retail Study

<b>Question: 19</b> <b>Are there any other key issues In Ledbury that should be addressed?</b>	<b>Qu: No:</b>  <b>19</b>
---	---------------------------------

**Summary of Questionnaire responses (from associated report)**

**Q20 a**  
Of 122 people who chose an option, 57% voted for Option 1 which proposed development to the south of Ledbury whilst only 43% voted for Option 2 (development to the west of the bypass).

However, 154 people made free write comments in relation to any new issues that might be considered in the Market Towns and Rural Areas Plan. These are analysed below.

<b>Summary of free-write questionnaire comments received</b>	
Support	3
More housing	1
Do not build outside of bypass as would be visually distinct from existing town	21
Infrastructure at capacity	37
Loss of tourism/quality of life value through overdevelopment	3
Impact on car parking/congestion	30
More employment generally needed first to address commuting	18
Public transport/walking/cycling improvements needed including car parking at station	14
Need for northern by-pass	12
Support for home working/small businesses	1
Need for affordable housing	9
Less crime	1
Lack of play/sports facilities	3
Park and ride/shuttle bus service for new development	1
Acquire Ledbury Park	2
Need for eastern by-pass	12
Need for new facilities for new development	2
Redistribute housing to Ross	1
Redistribute housing to local villages	2
Use other sites for development	4
Retain cricket/football club	13
Protect Dymock Rd area for canal development	4
Identify future retail development land	7
Refer to Ledbury Town Plan	5
Protect garden land	1
Identify brand for Ledbury	2
Detailed design needs thinking about	2
Use of empty properties/shops for housing	1
Eutrophication of R Leadon	1
Reduce amount of housing to be developed	6

Land at viaduct site floods	2
No need for new housing	2
New development should be accompanied by a green policy	2
Need policy to promote high street regeneration in market towns	2
Loss of agricultural land	1
No need for new park	1
Need playing pitch strategy	1
Protect viaduct land for employment	3
Need for additional tourist accommodation	1
New town	1

### **Summary of responses from Stakeholders**

**Civic Society** - Do not build beyond bypass, need jobs first. Infrastructure is at capacity.

**H and G Canal Trust** - Restore canal from Bromyard Road to Hazle Mill and create linear park

**Natural England** - River Leadon suffers from eutrophication

**CPRE** - Need >40% affordable housing, smaller housing, consider loss of agricultural land. Promote high st retailing.

**Ledbury Town Council** - Concern re capacity of infrastructure, bypass to Malvern, social housing, retention of existing open space at Cricket Ground

**English Heritage** - concern regarding visual integration of proposed options. Check HEDID study.

**Nature Trust** - employment site to SW will detrimentally affect appearance of town

### **Any new issues to be considered in HAP or MTRAP:**

Refer to Ledbury Town Plan

Car parking problems

Northern by-pass

Reduce crime - check?

Eastern by-pass to Malvern

Rail/bus improvements

Create linear park

Retail land

Eutrophication of River Leadon

Canal development/linear park

New facilities for new housing

Increasingly aged population

Detailed design issues

Identify brand for Ledbury?

**Any new options to be considered before Submission?**

Phase employment land to happen first  
Increase amount of allocated employment land  
Consider other proposed land for development  
Use of empty shops/houses  
Criteria based policy on retail

**Any new evidence required?**

Refresh of retail study  
Refresh of employment study

<b>Question: 20: Please explain any things you do not agree with regarding options 1 and 2 for Ledbury</b>	<b>Qu: No:</b>
<p><b>Summary of Questionnaire responses (from associated report)</b></p> <p><b>Q20A:</b> Of 122 people who chose an option, 57% voted for Option 1 which proposed development to the south of Ledbury whilst only 43% voted for Option 2 (development to the west of the bypass). However, 127 people completed the free-write text suggesting changes to the options and around 76 of these were not keen on either option for Ledbury.</p> <p><b>Q21:</b> Should the cricket ground/football club be included in any proposals? Of the 153 people who responded to this question 58% said that the cricket/football club should not be included in either option.</p>	
<p><b>Summary of free-write questionnaire comments received</b></p>	
<p>Don't like either option/do not build beyond the bypass</p> <p>More housing would increase commuting</p> <p>Divert to Ross or other market towns/villages</p> <p>Combine housing to north and west with canal restoration</p> <p>Retain cricket club</p> <p>Build on cricket ground</p> <p>Need northern bypass</p> <p>Need employment land first</p> <p>Infrastructure is at capacity</p> <p>Build on football but not cricket ground</p> <p>Impact on AONB</p> <p>DR site could be employment only</p> <p>Develop cricket ground only</p> <p>Move formal park to existing rec</p> <p>Use LM for employment only</p> <p>Reduce amount of housing</p> <p>Affordable housing only</p> <p>Western focus would detract from character of town setting</p> <p>Loss of agricultural land</p> <p>Keep VS as employment, no new employment to west of town</p> <p>No TV reception at VS</p> <p>Need eastern bypass</p> <p>Have mixed use on VS</p> <p>Need more car parking</p> <p>Need to incorporate green infrastructure into viaduct site to link to AONB and address detailed design and layout</p> <p>Improve transport including pedestrian and cycle links</p> <p>Develop land to north of station east of Bosbury Road</p> <p>Use LM site for formal park</p> <p>Build on strip of land from Full Pitcher to Gloucester Road</p> <p>Use LM site for more housing</p>	<p>76 +3 (Qu 7)</p> <p>6</p> <p>4</p> <p>1</p> <p>17</p> <p>4</p> <p>6</p> <p>2</p> <p>14</p> <p>1</p> <p>2</p> <p>2</p> <p>4</p> <p>1</p> <p>6</p> <p>6</p> <p>3</p> <p>3</p> <p>3</p> <p>7</p> <p>1</p> <p>1</p> <p>1</p> <p>1</p> <p>2</p> <p>7</p> <p>1</p> <p>1</p> <p>1</p> <p>1</p>

## Summary of responses from Stakeholders

**English Heritage:** concerned regarding scale of development allocated to Ledbury given its surrounding landscape constraints, existing built form and setting.

Malvern Hills AONB Partnership: Need to incorporate green infrastructure into viaduct site to link to AONB and address detailed design and layout

**Civic Society** - Dislike either option. Reallocate housing to Ross. Build on Cricket ground.

**Herefordshire and Gloucestershire Canal Trust** - Build all housing north of viaduct.

**Natural England**- Use viaduct site for industry, not west of town

**CPRE** - contain growth within bypass. Retain Cricket club. Reallocate housing to nearby communities. Accept employment to west. No

**Ledbury Town Council** - Do not build beyond bypass. See town plan. Retain cricket club.

**Nature Trust** - object to employment at west, keep at viaduct site. Prefer

### Any new issues to be considered in HAP or MTRAP:

Need northern bypass

Need eastern bypass

Use empty homes

Loss of agricultural land

Infrastructure is at capacity

Incorporate green infrastructure into viaduct site

### Any new options to be considered before Submission?

Develop land to east of Bosbury Road??

Build on strip of land from Full Pitcher to Gloucester Road

Divert housing to Ross and/or villages

DR site could be employment only

Move formal park to existing rec

Keep Vm site for employment only

Use LM site for formal park

Use LM site for more housing and don't build on Viaduct site

### Any new evidence required?

Refresh of retail and employment studies

<b>Question: Leominster - Key Issues</b>	<b>Qu: No:</b> <b>22</b>
--	-----------------------------

**Summary of Questionnaire responses (from associated report)**

There were a total of 75 responses to this question with many of the issues raised to be considered for the Market Towns and Rural Areas Plan.

<b>Summary of free-write questionnaire comments received</b>	
	No of responses
Improve employment take up / attract employers	11
Improve Railway and associated parking	7
Improve existing infrastructure / ease congestion through town	8
Increase youth / leisure / sports facilities	6
Already enough poverty / deprived households	5
No desire for relief road / undeliverable	5
Improve surface water flooding	4
Size of development unsustainable	4
More community / health care facilities	4
Ease traffic congestion through town	3
Increasing violence and vandalism / more police presence needed	2
Enhance corn square / make it traffic free	2
No need for further retail facilities	2
More open space provision	2
Improve public transport	2
Consider landscape constraints	1
Fill empty residential properties first	1
Ensure new development has high levels of design	1
Protect bird species in or around development	1
Improve elderly care provision	1

**Summary of responses from Stakeholders**

**Leominster Town Council:** Surface water flooding needs to be given higher priority, in particular the Worcester Road / Industrial Estate / Silurian Close. New housing to be of the highest environmental standards. Need a range of houses including 4 bedroom, and gardens for families. Need to encourage more use of the rail station and improve provision of parking of railway station parking.

**Herefordshire and Worcestershire Chamber of Commerce:** Supports the southern development of Leominster with the improvements to the infrastructure.

**Natural England:** Improve public transport and services should also include a traffic and demand management programme to enhance movement generally and to assist the viability and quality of the town centre. Due to the increase in homes need to ensure that negative public pressure to the recreation sites of Queenswood and Bodenham are offset.

**Aymestry Parish Council:** Improve take up on industrial estate, and improve rail and road links.

**Wigmore Group Parish Council:** requires improvements to employment take up / availability, lower business rates to promote local employment.

**CPRE:** Landscape constraints around Leominster are not limited to Cockcroft Hill, but includes extensive areas of High and Medium-to-high Sensitivity landscape to the north, west and south of the town as set out in the Urban Fringe Analysis.

**Any new issues to be considered in MTRAP:**

Lack of Sport's facilities / football pitch  
Review of employment designations  
Lack of youth facilities  
Improvements to the rail station and car parking at the station  
Surface water management  
Traffic issues at Bargates  
Improve areas around Ridgemoor  
Make Corn square traffic free  
Enhance Corn square

**Any new options to be considered before Submission?**

No

**Any new evidence required?**

A refresh of the Employment land study  
A refresh of the Retail Study

**Summary of Questionnaire responses (from associated report)**

A total of 152 people responded to this question. Of these 103 or 68% agreed that the southern urban extension is the preferred option for Leominster. A further 11% agreed but wanted some minor changes to the option and 21% (32 people) did not agree with the preferred option.

Those who made suggestions for changes or highlighted any issues these are detailed below.

**Summary of free-write questionnaire comments received**

Unsustainable growth proposed	11
Improve sustainable transport	7
There will be a large increase of cars / congestion	7
Not enough employment available	5
Unbalanced split of growth between market towns	4
Tackle surface water flooding	3
Southern Relief road / urban extension is needed	3
No large scale retail proposals	3
Ensure proper road links to ease congestion	3
Design is very important	3
Railway improvements	3
Compromise the area's beauty and quality of landscape	3
Much better sewage management	2
Community facilities needed	2
Archaeological potential in the South West	2
Additional Schools required	1
Ensure green infrastructure is included	1
Manage existing infrastructure	1

**Summary of responses from Stakeholders**

**Leominster Town Council:** Supports the southern urban extension.

**Natural England:** Encourage green transport and secure more sustainable transport for Leominster. Given the size of the growth proposal we strongly urge a Concept Statement for the site, this would give direction to the masterplan, we recommend that this Concept Statement draws upon eco-town standards as a means of ensuring development delivers the highest possible sustainability standards. We welcome the inclusion of the Green Infrastructure within the urban extension.

**English Heritage:** Have some concerns over the scale of the proposed development and its impact on the town centre, particularly if there is significant retail development included on the site, which could potentially weaken the opportunities for regeneration within the existing urban area and town centre.

**Aymestry Parish Council:** Leominster needs rejuvenating but from the inside-out, not with new housing estates. There are parts of the town that need redeveloping first.

**Leominster Civic Society:** Has concerns regarding people commuting to Hereford, Birmingham and Worcester, they require housing to ultimately meet local needs as identified in the Regional Plan Policy CF1.

**CPRE:** Agree there is some scope for a south-western extension of Leominster, but do not feel that the figure of 1,700 homes can be achieved on the unconstrained low/medium or medium landscape sensitivity, only 1,200 could be achieved here. Any development beyond these sites for housing or roads would be a major intrusion into the landscape. Also doubt the capacity of the highly protected river system to cope with the extra water abstraction or sewage.

**Herefordshire Nature Trust:** Feels that there needs to be more evidence on transport and traffic credentials to justify the level of growth as there appears to be an imbalance between housing numbers for the market towns. If the level of allocation goes ahead then developer contributions should be sought to go towards public transport improvements particularly to increase the potential for higher rail use for commuting to Hereford and other workplace locations, also include comprehensive footpaths and cycle routes.

**Any new issues to be considered in HAP or MTRAP:**

Surface water management  
Improve sustainable transport  
Improve employment opportunities  
Increase community facilities  
Include green infrastructure  
Improve railway station and associated car parking

**Any new options to be considered before Submission?**

No

**Any new evidence required?**

Question:24 Ross-on-Wye	Qu: No:																																																																
<p><b>Summary of Questionnaire responses (from associated report)</b></p> <p>A total of 87 people made comments in relation to any new issues that might be considered in the Market Towns and Rural Areas Plan. These comments are analysed below.</p>																																																																	
<p><b>Summary of free-write questionnaire comments received</b></p> <table border="0"> <tr> <td>Road infrastructure is inadequate, development will add to congestion deterring use of the town</td> <td style="text-align: right;">11</td> </tr> <tr> <td>Need affordable and social housing</td> <td style="text-align: right;">7</td> </tr> <tr> <td>Recreational and leisure facilities need improvement</td> <td style="text-align: right;">7</td> </tr> <tr> <td>Need for a bypass from Hildersley to Tudorville or a southern relief road</td> <td style="text-align: right;">5</td> </tr> <tr> <td>More employment needed to address out commuting</td> <td style="text-align: right;">5</td> </tr> <tr> <td>Support for proposals</td> <td style="text-align: right;">4</td> </tr> <tr> <td>Better public transport</td> <td style="text-align: right;">3</td> </tr> <tr> <td>Not enough parking if further development happens</td> <td style="text-align: right;">3</td> </tr> <tr> <td>Free parking for a small amount of time would encourage more convenience purchasing</td> <td style="text-align: right;">3</td> </tr> <tr> <td>The Conservation area for Ross was identified as at risk in the Heritage at Risk Register 2009. Maintain the unique character</td> <td style="text-align: right;">3</td> </tr> <tr> <td>More houses needed</td> <td style="text-align: right;">2</td> </tr> <tr> <td>Pedestrianisation of the town</td> <td style="text-align: right;">2</td> </tr> <tr> <td>Better pedestrian access from Morrisons Shopping centre to town</td> <td style="text-align: right;">2</td> </tr> <tr> <td>Provide a cycle route to Walford</td> <td style="text-align: right;">2</td> </tr> <tr> <td>Need to integrate Model Farm with the town</td> <td style="text-align: right;">2</td> </tr> <tr> <td>Empty shops are a problem and not just a symptom of the recession</td> <td style="text-align: right;">2</td> </tr> <tr> <td>Another main road from Ross to Hereford</td> <td style="text-align: right;">1</td> </tr> <tr> <td>Improve public toilets at the Crofts</td> <td style="text-align: right;">1</td> </tr> <tr> <td>Reopen the railway</td> <td style="text-align: right;">1</td> </tr> <tr> <td>No more house building</td> <td style="text-align: right;">1</td> </tr> <tr> <td>The Overross site is not a desirable site</td> <td style="text-align: right;">1</td> </tr> <tr> <td>More support for small businesses and people working from home</td> <td style="text-align: right;">1</td> </tr> <tr> <td>Overross site should have significant areas of green infrastructure as it borders the AONB</td> <td style="text-align: right;">1</td> </tr> <tr> <td>Need low carbon sustainable homes</td> <td style="text-align: right;">1</td> </tr> <tr> <td>Reduce crime and better policing</td> <td style="text-align: right;">1</td> </tr> <tr> <td>John Kyrle School is at full capacity</td> <td style="text-align: right;">1</td> </tr> <tr> <td>Allotment land should be identified</td> <td style="text-align: right;">1</td> </tr> <tr> <td>No further development along the B4234 Walford Road</td> <td style="text-align: right;">1</td> </tr> <tr> <td>Park and ride site needed on the outskirts of town</td> <td style="text-align: right;">1</td> </tr> <tr> <td>Police station will need upgrading if further residential development is planned</td> <td style="text-align: right;">1</td> </tr> <tr> <td>Review the retail market share to look at convenience goods need to enhance further retail to the town.</td> <td style="text-align: right;">1</td> </tr> <tr> <td>Royal Mail's Ross on Wye delivery office has redevelopment potential</td> <td style="text-align: right;">1</td> </tr> </table>		Road infrastructure is inadequate, development will add to congestion deterring use of the town	11	Need affordable and social housing	7	Recreational and leisure facilities need improvement	7	Need for a bypass from Hildersley to Tudorville or a southern relief road	5	More employment needed to address out commuting	5	Support for proposals	4	Better public transport	3	Not enough parking if further development happens	3	Free parking for a small amount of time would encourage more convenience purchasing	3	The Conservation area for Ross was identified as at risk in the Heritage at Risk Register 2009. Maintain the unique character	3	More houses needed	2	Pedestrianisation of the town	2	Better pedestrian access from Morrisons Shopping centre to town	2	Provide a cycle route to Walford	2	Need to integrate Model Farm with the town	2	Empty shops are a problem and not just a symptom of the recession	2	Another main road from Ross to Hereford	1	Improve public toilets at the Crofts	1	Reopen the railway	1	No more house building	1	The Overross site is not a desirable site	1	More support for small businesses and people working from home	1	Overross site should have significant areas of green infrastructure as it borders the AONB	1	Need low carbon sustainable homes	1	Reduce crime and better policing	1	John Kyrle School is at full capacity	1	Allotment land should be identified	1	No further development along the B4234 Walford Road	1	Park and ride site needed on the outskirts of town	1	Police station will need upgrading if further residential development is planned	1	Review the retail market share to look at convenience goods need to enhance further retail to the town.	1	Royal Mail's Ross on Wye delivery office has redevelopment potential	1
Road infrastructure is inadequate, development will add to congestion deterring use of the town	11																																																																
Need affordable and social housing	7																																																																
Recreational and leisure facilities need improvement	7																																																																
Need for a bypass from Hildersley to Tudorville or a southern relief road	5																																																																
More employment needed to address out commuting	5																																																																
Support for proposals	4																																																																
Better public transport	3																																																																
Not enough parking if further development happens	3																																																																
Free parking for a small amount of time would encourage more convenience purchasing	3																																																																
The Conservation area for Ross was identified as at risk in the Heritage at Risk Register 2009. Maintain the unique character	3																																																																
More houses needed	2																																																																
Pedestrianisation of the town	2																																																																
Better pedestrian access from Morrisons Shopping centre to town	2																																																																
Provide a cycle route to Walford	2																																																																
Need to integrate Model Farm with the town	2																																																																
Empty shops are a problem and not just a symptom of the recession	2																																																																
Another main road from Ross to Hereford	1																																																																
Improve public toilets at the Crofts	1																																																																
Reopen the railway	1																																																																
No more house building	1																																																																
The Overross site is not a desirable site	1																																																																
More support for small businesses and people working from home	1																																																																
Overross site should have significant areas of green infrastructure as it borders the AONB	1																																																																
Need low carbon sustainable homes	1																																																																
Reduce crime and better policing	1																																																																
John Kyrle School is at full capacity	1																																																																
Allotment land should be identified	1																																																																
No further development along the B4234 Walford Road	1																																																																
Park and ride site needed on the outskirts of town	1																																																																
Police station will need upgrading if further residential development is planned	1																																																																
Review the retail market share to look at convenience goods need to enhance further retail to the town.	1																																																																
Royal Mail's Ross on Wye delivery office has redevelopment potential	1																																																																

More sensitive planning around the M50 as it is the entrance to the Wye Valley AONB	1
Maintain the attractiveness of town for tourist industry	1
Expand the livestock market	1
Need for visual integration with the existing built fabric and surrounding landscape.	1
Use water sources for electric generation	1
Push for the technology corridor to include Ross (RSS policy)	1

**Summary of responses from Stakeholders**

**English Heritage:** Need for visual integration with the existing built fabric and surrounding landscape. The Conservation area for Ross was identified as at risk in the Heritage at Risk Register 2009.

**Herefordshire Council, Head of Access and Commissioning:** 500 dwellings 30 ft for 2-4 year olds pre-school places, requiring one or two buildings. The High school will need to increase capacity by 150 places. Better youth and children's services required

**Sport England:** Up to date playing field and sports strategy

**Ross Civic Society:** Pedestrianisation of the town centre

**Ross Town Council:** Roads are congested. Affordable homes are needed and low carbon sustainable homes would be welcome.

**West Mercia Police:** The existing station needs upgrading should the proposed development happen.

**Walford Parish Council:** Better linkage of Ross to neighbouring villages such as Walford via a cycle route. Some allowance on free parking would increase spending within Ross's independent shops. Better pedestrian access from Morrisons.

**Ross Town Plan Steering Group:** Concern about capacity of the infrastructure. The need for a relief road has been identified in the Ross Town Plan. No mention of parking in the Place Shaping paper. Empty shops need addressing. Cannot endorse the need for further comparison goods floorspace of 3,500 sq mtrs.

**Herefordshire Environment Partnership:** Higher amount of housing development at Ross is desirable.

**Herefordshire Nature Trust:** Higher amount of housing development at Ross is desirable.

**Little Birch Parish Council:** Lack of sporting facilities. Independent retailers are at risk from weekly market traders.

**Any new issues to be considered in HAP or MTRAP:**

The existing police station needs upgrading should the proposed development happen.

The Conservation area for Ross was identified as at risk in the Heritage at Risk Register 2009.

**Any new options to be considered before Submission?**

Road infrastructure is inadequate, development will add to congestion  
detering use of the town

**Any new evidence required?**

Refresh of Employment Land Study  
Refresh of Retail Study  
Water Resource  
Open Space Study  
Green Infrastructure Strategy

<b>Question: 25 Ross-on-Wye</b>	<b>Qu: No:</b>
---------------------------------	----------------

**Summary of Questionnaire responses (from associated report)**

Of 126 people who chose an option, 45% voted for Option 1 which proposed development to the north east of Ross whilst a greater amount of people, 55% voted for Option 2 which has a north south focus.

A total of 87 people made comments in relation to any new issues that might be considered in the Market Towns and Rural Areas Plan. These comments are analysed below.

**Summary of free-write questionnaire comments received**

Overross site is too remote from town and should not be developed	8
Road infrastructure is inadequate, development will add to congestion deterring use of the town	8
A dispersed approach to development would be more favourable.	8
Recreational and leisure facilities need improvement	7
Overross site is best as it delivers community infrastructure such as recreation space.	6
Hildersley site is less sensitive in landscape terms	5
Overross site is challenging as access onto A40 bypass would create road noise and more traffic	5
Overross site is too sensitive in landscape terms	5
Overross site should have sustainable access connections to town	4
Support for homes at Hildersley	4
Hildersley should take all the housing development	4
More employment needed to address out commuting.	4
The relocation of the rifle range would benefit Ross residents, amenity users and defence estates. Persuade the MOD to release the land.	3
Question whether Ross can accommodate more growth being close to the Wye Valley AONB	3
More houses needed	3
Community infrastructure will not cope i.e schools, medical etc.	3
Hildersley site is more sensitive in landscape terms	2
Doubts over sewerage capacity.	2
Land to the south west of Ross should have been pursued as an option as it is equally constrained as the options put forward	2
Car parking is inadequate to support new development	2
Hildersley site should not go ahead as it may be a barrier to a future southern bypass.	1
Need for a bypass from Hildersley to Tudorville or a southern relief road	1
Traffic management will be a priority for Section 106 planning obligations	1
Restore the rail link in Ross	1
Create a link to the National Cycle Network	1

Better quality shops	1
Less crime	1
Need more starter homes	1
Empty shops are a problem, could be too many	1
Too many cafes	1
Too many charity shops	1
Too many estate agents	1
Impact of development on bats near Ross	1
Greytrees should be extended to the west	1
Cawdor allotments should be developed	1
Convert large houses along Walford Road into flats	1
More facilities for water treatment required	1
Overross and Hildersley should retain some land for industrial growth	1
Better public transport facilities	1
MOD has no plans to dispose of the site but may consider this should a suitable replacement site be provided in an appropriate location between Pontrilas and Credenhill	1
Loss of agricultural land	1
The Overross site is close to Romano-British sites and there is uncertain potential. Hildersley site is the same but there are additional historic landscape concerns about the prominence of parts of the location.	1
Cannot endorse the need for further comparison goods floorspace of 3,500 sq mtrs.	1
Ross should have more homes	1

### Summary of responses from Stakeholders

**Ross Civic Society:** Overross site should have sustainable access connections to town. Support for homes at Hildersley. Need for a bypass from Hildersley to Tudorville or a southern relief road.

**Ross Town Council:** Road infrastructure is inadequate, development will add to congestion deterring use of the town. A dispersed approach to development would be more favourable. Doubts over sewerage capacity. Recreational and leisure facilities need improvement. More employment needed to address out commuting. Restore the rail link in Ross. Create a link to the National Cycle Network.

**Natural England:** Overross site is best as it delivers community infrastructure such as recreation space.

**Ministry of Defence:** MOD has no plans to dispose of the site but may consider this should a suitable replacement site be provided in an appropriate location between Pontrilas and Credenhill

**Herefordshire Council, Archaeology Department:** The Overross site is close to Romano-British sites and there is uncertain potential. Hildersley site is the same but there are additional historic landscape concerns about the prominence of parts of the location.

**English Heritage:** Include information on potential impacts on the historic character of the town and its surrounding landscapes and heritage assets. Development should be informed by the Rapid Characterisation Assessment.

**CPRE:** Do not support either option. Hildersley could accommodate 350 dwellings. The development of Overross is an unnecessary extension

**Marstow Parish Council:** Ross cannot support the proposed developments. Parking is also inadequate for such an increase. There would be a strain on schools and medical/dental facilities.

**Upton Bishop Parish Council:** All development should be at Hildersley. No support for development at Overross due to potential impacts in the cattle market area.

**Aconbury Parish Council:** The Overross site is remote from town and would be too separated from the town.

**Any new issues to be considered in HAP or MTRAP:**

Cannot endorse the need for further comparison goods floorspace of 3,500 sq mtrs.

Explore options for congestion relief

**Any new options to be considered before Submission?**

Doubts over sewerage capacity.

More facilities for water treatment required

Need for further exploration of the dispersed option

**Any new evidence required?**

Refresh of Retail Study

Refresh of Employment Study

Water Resource

HEDIS

Green Infrastructure Strategy

<b>Question:</b> Rural Areas - Additional Issues	<b>Qu: No:</b> Q26
<p><b>Summary of Questionnaire responses (from associated report)</b></p> <p>Not applicable - free write box only</p>	
<p><b>Summary of free-write questionnaire comments received</b></p> <p>A number of free write responses were received with regard to Q26. The prominent issues and officer comments are outlined below:</p> <p>Increased need for affordable housing: This is a priority of the core strategy and the development of affordable housing will be supported in all settlements throughout Herefordshire where there is a quantifiable need.</p> <p>Need to improve infrastructure (including public transport) and utility facilities, especially the delivery of high speed broadband: The core strategy is promoting the use of sustainable transport methods and rural development is focused on areas of existing high standard of public transport. S106 contributions will sought where appropriate to improve utility facilities and the delivery of high speed broadband is a priority of the core strategy in rural areas.</p> <p>A greater focus should be placed on preserving agricultural land and supporting agricultural development: The core strategy is proposing to provide support for agricultural and farm diversification. Furthermore the local distinctiveness policy is seeking to protect and enhance local landscapes including important vistas across agricultural land.</p> <p>Greater flexibility should be allowed to develop in all settlements in rural Herefordshire and a geographical spread of RSCs should be adopted: RSCs were designated on existing service provision rather than geographical location. No all settlements in Herefordshire are sustainable locations for development and could increase dependence on private motorised transport. Option 2 of tier 2 settlements does provide flexibility for settlements to develop subject to the availability of key day to day services and good public transport connections.</p> <p>Develop community and leisure facilities to meet the needs of the younger generations: These facilities can be delivered through S106 contributions on appropriate developments. Policy within the core strategy will seek the preservation of recreational facilities where applicable. Specific needs of a locality will be examined within the Market Towns and Rural Areas Plan.</p>	

Many responses were received regarding the classification of a settlement. Following comments received the Rural Settlement Hierarchy is to be reviewed and alterations made where necessary. The core strategy acknowledges that differing development constraints exist around different settlements and exact levels of development will be contained within the MTRAP.

Protect and provide new Public Rights of Way, cycle paths and linkages between rural settlements: The Green Infrastructure policy seeks to protect and enhance such land classifications.

### **Summary of responses from Stakeholders**

CPRE: Need to refer and protect the environmental landscape, biodiversity and heritage of the rural areas: These issues are covered within the Local Distinctiveness policy of the core strategy.

English Heritage: Need to ensure that the results of the West Midlands Farmsteads and Landscape project inform the Core Strategy and Market Towns and Rural Areas Plan in terms of delivering sufficient flexibility to capitalise on the opportunities for the sustainable use of historic farmsteads for employment and residential uses. The potential benefit of re-utisling historic farmsteads will be examined within the MTRAP.

Natural England: The environmental visions of the 2010 SCS clearly overlap with the aspiration of rural development: The core strategy is being completed in line with the adopted Sustainable Communities Strategy to help achieve Herefordshire's Partnerships overall objectives.

Town / Parish Councils: A number of the town and parish councils submitted views mirroring the points raised above. However, the most common response received was for the need to deliver affordable housing.

### **Any new issues to be considered in HAP or MTRAP:**

Site specific development opportunities / constraints will be examined in the MTRAP following a review of the evidence within the Strategic Housing Land Availability Assessment.

### **Any new options to be considered before Submission?**

Following comments received the Rural Settlement Hierarchy will be need to be reviewed and alterations made where necessary.

### **Any new evidence required?**

<b>Question:</b> Preferred approach for new jobs and shops (rural areas)	<b>No:</b> 27a
--	----------------

**Summary of Questionnaire responses (from associated report)**

Majority of respondents agreed with the preferred approach

Total number of responses: 367  
Yes: 224 (61%)  
Yes with minor changes: 101 (28%)  
No: 42 (11%)

**Summary of free-write questionnaire comments received**

More emphasis on jobs in sustainable local farming, not just diversification  
The promotion of local produce and tourism will create many rural job opportunities  
The need for better broadband to facilitate remote working  
The need for more live/work units  
Agricultural workers need accommodation on site  
Should the promotion of home working opportunities be referenced alongside live/work?  
More jobs needed in rural areas  
Manage the expansion of farm shops to prevent them from operating at an inappropriate scale  
Promote small-scale horticultural and related rural craft enterprises  
Limiting jobs and shops to RSCs may stifle economic development in other viable settlements  
Respect the existance of polytunnels  
More specific policies for change of use  
The need to allow the redevelopment of rural brownfield sites for uses other than agriculture  
How will you get the young to work in rural areas?  
Need a wider variety of jobs that pay a living wage

**Summary of responses from Stakeholders**

**Natural England:** The promotion of live/work units is welcome.  
**CLA West Midlands:** Businesses in the countryside need to have the flexibility to develop and diversify. The Core Strategy must include policies that recognise the role of agriculture, horticulture and forestry and the changes taking place within these industries.  
**English Heritage:** Need to ensure that the results of the West Midlands Farmsteads and Landscape project inform the Core Strategy and Market Towns and Rural Areas Plan in terms of delivering sufficient flexibility to capitalise on the opportunities for the sustainable use of historic farmsteads for employment and residential uses.  
**CPRE:** Response listed under Q28

**Any new issues to be considered in HAP or MTRAP:**

Creation of jobs in tourism and food production

**Any new options to be considered before Submission?**

No

**Any new evidence required?**

Various Town and Parish Plans and Village Design Statements

<b>Question:</b> Is the preferred approach to defining RSCs and Hubs correct? Please explain any changes?	<b>Qu: Nu:</b> 28 a) b)
<b>Summary of Questionnaire Responses (from associated report)</b>  Number of respondents: 313 Response - Yes: 182 (58%) Response - Yes with minor changes: 73 (23%) Response - No: 58 (19%)	
<b>Summary of free-write questionnaire comments received</b>  As highlighted above, a high level of positive responses for the preferred approach to defining RSCs and Hubs  Set out below are the negative comments received or changes sought. Wish for a greater geographical dispersion. Views submitted stated that the proposed locations leave large sections of the County vacant of future development, potentially risking existing services - this could be solved through the adoption of Option 2 Tier 2 settlements.  Queries over the number of RSCs and Hubs. Views have been varied. A level of response submitted states too many RSCs are designated and therefore the level of development at each settlement will not be sufficient to ensure viability. Countering this, views seeking more RSCs to ensure rural regeneration and sustainability has been submitted. However, no extra RSCs can as yet be defined as it linked to existing service provision. The level of development at RSCs are constrained by site specific issues which will be examined in the SHLAA. Alongside this there is a view that developing RSCs will be detrimental to Market Towns, however development will also be focused to these areas to ensure they maintain their status are important settlements within Herefordshire.  Response have been received stating a desire to change the weighting given to a number of services. Maximum weighting of 3 points was given to day to day services alongside the relative availability of public transport, as these are the most important services to ensure sustainable communities (as was identified in previous consultations). 1 point is allocated to other services.  A high level of response has been received regarding specific settlements. While these will be examined in more detail within the MTRAP, the views submitted can have an impact upon the Rural Settlement Hierarchy. More than one representation for support for development in the following settlements were received. <ol style="list-style-type: none"> <li>1. Staunton On Wye</li> <li>2. Fownhope</li> <li>3. Bishops Frome</li> <li>4. Credenhill</li> <li>5. Much Marcle</li> <li>6. Burley Gate</li> <li>7. Cradley</li> <li>8. Bodenham and Bodenham Moor</li> </ol> More than one representation against focusing development in the following settlements were received. <ol style="list-style-type: none"> <li>1. Ewyas Harold</li> <li>2. Winnal</li> <li>3. Eardisley</li> </ol>	

Following the views submitted, a review of the Rural Settlement Hierarchy will be undertaken.

#### **Summary of responses from Stakeholders**

CPRE: Supports the overall idea of focusing development to a number of RSCs but believe there are further issues that need addressing. These are outlined below with key responses.

a) RSCs are places with existing services and should not be seen as simply settlements with capacity. As such there should be a wider geographical dispersal. While the comment is noted, provision of existing services is intrinsically linked with sustainable locations of growth and locating development in settlements based solely of geographical location could lead to urbanisation of unsuitable areas.

b) Against development of RSCs around Hereford City. A series of hubs and RSCs have been identified around Hereford but they also serve their rural hinterlands and as such as appropriate locations for development.

c) Services within RSCs may disappear without protection and the policy will halt development in settlements with most essential services. Designating development in/around RSCs is designed to ensure the long-term viability of services. Furthermore Option 2 of tier 2 settlements will allow for development outside the original defined settlements.

d) Public transport criteria is inadequate as it primarily focuses on work commuters. However, the maximum weighting was given where there is a regular peak and off-peak service.

e) The strategy does outline the growth of Market Towns. This is covered in the preferred strategy and outlined in section 6.

CPRE also promote the settlements of Fownhope and Longtown for development

CLA: Are opposed to the policy as it restricts development in certain areas to promote other settlements. However, this is necessary in order to promote development in the most sustainable locations and to ensure their viability. Furthermore, limited development will still be possible below tier 1.

Parish/Town Councils: Of the Parish and Town Council's who responded specifically to the question, over 87% supported the policy with some seeking minor alterations. A number of the changes were with regard to specific settlements. No common feature as to why the Parish or Town Council's did not support the application.

Sport England: Supports the preferred option

#### **Any new issues to be considered in the HAP or MTRAP:**

Tier 1 settlements will be outlined in the Core Strategy and taken forward in more detail in the MTRAP.

Site specific development opportunities / constraints will be examined in the MTRAP following a review of the evidence within the Strategic Housing Land Availability Assessment.

#### **Any new options to be considered before Submission?**

No

#### **Any new evidence required?**

Though not new evidence, it is required to review the Rural Settlement Hierarchy following the comments received and make any necessary alterations to Tier 1 settlements

<b>Question:</b> Is the level of housing proposed in RSCs and Hubs about right? Any proposed changes?	<b>Qu: Nu:</b> 29 a) b)
<b>Summary of Questionnaire Responses (from associated report)</b>  Total Response: 312 Yes: 171 (55%) Yes with minor changes: 67 (21%) No: 74 (24%)	
<b>Summary of free-write questionnaire comments received</b>  While 76% of respondents supported the policy, those seeking minor changes or not in favour of the policy had a variety of reasons and suggestions. a) A number of respondents stated the number was too high and that would put too great a strain on existing services including utilities. b) Concentrate the development around fewer RSCs. c) Greater flexibility is required to deliver housing elsewhere. d) There is a need for a variety of housing type and improvements to current design standards (Eco housing needed) e) The developments will be detrimental to settlement character. f) Do not set maxima on development. g) Housing needs to be phased. h) Further work required on environmental issues, such as HRA and impact on AONB i) Development will lead to increase car usage.  In response to the comments, the figure quoted is continuing previous growth patterns. With regard to facilities and service improvements, developer contributions will be sought where necessary. As all RSCs have the provision of day to day services, dispersing the growth between them is more sustainable. Focusing too much development on fewer defined places will lead to too large an extension in the countryside at these areas and this is part of the reason why guideline housing figures have been introduced. Notwithstanding this, development will be focused in areas of high public transport provision. Local distinctiveness policy within the Place Shaping Paper outlines the commitments to protecting and enhancing the quality of the built environment. Furthermore Herefordshire Council has a responsibility to meet the needs of all communities and will provide a variety of housing type and tenure, built around guiding design principles. Alongside this, the SHLAA outlines the time periods of when housing is expected to be undertaken. Tier 2 option 2 would provide greater flexibility.  Settlement specific issues have also been received and while this is to be examined in more detail in the MTRAP, it may have implications on the Rural Settlement Hierarchy work. Positive comments received for: a) Pembridge as a designated RSC b) Wigmore to become a designated RSC c) Shobdon as a designated RSC d) Staunton on Wye to become a designated RSC Negative comments received for: a) Weobley to be dropped as RSC b) Credenhill to be dropped as RSC c) Colwall to be dropped as RSC d) Ewyas Harold to be dropped as RSC e) Stretton Sugwas to be dropped as Hub f) Madley to be dropped as RSC	

Settlements were designated on the existing service provision and access to public transport, with those not designated in Tier 1 due to a shortage in day to day services.

#### **Summary of responses from Stakeholders**

CPRE: Does not support the policy as it does not account for non-strategic windfall developments. However, no strategic sites are proposed in RSCs and Hubs and brownfield sites within these settlements will be allowed to be developed.

English Heritage: Supports the policy but it needs to include specific design and heritage issues. These will be examined as part of the Local Distinctiveness Policy and included within the MTRAP.

Natural England: Supports the policy but wishes to see the percentage increase the 100 new units would represent of the existing settlement. The details of settlement size are contained within the Rural Settlement Hierarchy.

Parish/Town Councils: Of the responses received from Parish and Town Councils, approximately 80% supported the policy in its existing form or subject to minor changes.

There were varied reasons why the policy was not supported by Parish and Town Councils or minor alterations sought, as outlined below:

- a) Greater flexibility as development required in all locations.
- b) Scale of development is too high and therefore potential impact upon settlement character.
- c) Lack of consultation.

In response to these views, firstly flexibility for more dispersed development across the County is put forward in option 2 of tier 2 settlements. Furthermore the scale of the development will be informed by the SHLAA which examines both the capacity of available land as well as potential constraints. The Community Needs Table within the Rural Settlement Hierarchy was compiled using Parish Plans. There has been many consultations over the past 18 months regarding the Rural Settlement Hierarchy, in particular there have been consultations specifically targeted to Parish Councils. Further consultation with Parish and Town Councils will take place especially regarding the site specific MTRAP.

Sport England: Supports the preferred option

#### **Any new issues to be considered in the HAP or MTRAP:**

Need to clearly outline the design and local distinctiveness policies within the MTRAP to ensure both communities and developers alike are aware of the impacts of new development.

The SHLAA needs to define the phasing of different residential developments to ensure that the existing services can accommodate increased demand.

**Any new options to be considered before Submission?**

No

**Any new evidence required?**

Though not new evidence, a review of the Rural Settlement Hierarchy is required and alterations made following this consultation where necessary.

<b>Question:</b> Which option for local centres (tier 2) do you prefer?	<b>Qu: Nu:</b> Q30 a) b)
<b>Summary of Questionnaire Responses (from associated report)</b>  Number of respondents: 287 Respondents in support of Option 1: 120 (42%) Respondents in support of Option 2: 167 (58%)	
<b>Summary of free-write questionnaire comments received</b> Examine the possibility of adopting Option 1 but introducing a third tier based on the criteria model.  Those in support of Option 2 state the provision of key day to day services as outlined in Appendix 6 Hierarchy Matrix alongside good public transport links. Also the level of existing utilities and broadband access. However, variation in the required number of existing services. Responses have suggested for the existence of 1 service should be sufficient. Local need could also be a determining factor.  As part of Option 2 criteria it is also suggested that design and impact on local character should be an important issue. Local character could include the existing size of the settlement.  The decision making process on future developments should be done by the Parish Council.  Parish 'clusters' could be examined as part of Option 2. This would be based on neighbouring settlements having the ability to provide the required service provision.	
<b>Summary of responses from Stakeholders</b> <u>CPRE:</u> Supports neither option. Advocates that service shortages in settlements should be addressed. Combining this with a criteria base to RSCs / Hub designations would then allow more settlements to be able to accommodate development sustainably.  <u>Parish Councils:</u> There is strong support for Option 2. However, not all respondents put forward comments for "reasonable" service provision. Those who did suggested a high level of key services outlined in Appendix 6 Hierarchy Matrix. Proximity / accessibility to other centres.	
<b>Any new issues to be considered in the HAP or MTRAP:</b>  The idea of clusters has already been examined and supported through the adoption of RSCs and Hubs. During the review of Rural Settlement Hierarchy, the availability of local clusters can be examined.	
<b>Any new options to be considered before Submission?</b> Support has been received for Option 1 to be adopted as tier 2 but then tier 3 to be introduced based on the criteria in Option 2 to provide flexibility during the plan period. This flexibility is covered if Option 2 is adopted and therefore the the third tier option does not need further examination.	
<b>Any new evidence required?</b> Though not new evidence, it is required to review the Rural Settlement Hierarchy following the comments received and make any necessary alterations to tier 2 settlements. As option 2 has received most significant support but the proposals as to the level of service provision is varied. As such the Rural Settlement Hierarchy will need to be revisited and Option 2 taken forward.	



**Question:** do you agree with the preferred options approach to restricting new development outside Tiers 1 and 2? Any changes? **Qu: Nu:** 31a and b

**Summary of Questionnaire Responses (from associated report)**

Numer of respondents: 323  
Yes - agree with preferred approach 60% (194)  
Yes with minor changes - agree with preferred approach 17% (55)  
No - do not agree with preferred approach 23% (74)

**Summary of free-write questionnaire comments received**

There is strong support for the policy especially for providing new affordable housing for local residents based on a defined local need.

A number of the negative responses state limited open market property should be allowed during the plan period on a basis of an affordable housing contribution per single new build properties. A number of these responses state that this is needed to ensure affordable housing delivery; however, the exceptions policy already actively promotes affordable housing delivery.

Negative responses also advocate that bespoke energy efficiency properties should be allowed. PPS7 does allow the development of exceptionally high quality properties to built in the open Countryside. Furthermore, below tier 2 open market development would be unsustainable through increased need in private motorised transport. If option 2 of tier 2 settlements were adopted then limited open market property could be acceptable during the lifetime of the plan subject to criteria and increases in service provision in the undefined rural areas.

Negative responses have also been received about barn conversions and prioritising these for employment uses. However, the policy does not state that conversions to residential use are prohibited.

There is also a worry that the needs for affordable housing development will outweigh all environmental constraints.

A number of points raised with regard to specific settlements. These will be examined the MTRAP.

**Summary of responses from Stakeholders**

English Heritage: Are seeking a more flexible and proactive approach to conversion and reuse for either residential or employments use of historic farmsteads. English Heritage wish to discuss the results of the West Midlands Farmsteads and Landscape Project.

Parish / Town Councils: An even split for and against the policy direction. However, there is support for the provision of rural affordable housing for local people and the need for flexibility to meet changes during the plan period.

Rural Stakeholders: CLA/NFU both advocate the need for flexibility.

**Any new issues to be considered in the HAP or MTRAP:**

For MTRAP, the policy will need to be unambiguous about conversion of rural buildings. Though the Place Shaping Paper advocates employment use, it does not prohibit residential development. Clear policy as to when residential development would be accepted should be included.

Wording on exception policy must be clear as to which other criteria / policies apply (e.g. existing H10 UDP policy).

Review of Rural Settlement Hierarchy based on the additional comments received and review which option for tier 2 settlements is most appropriate. Option 2 provides the greatest flexibility during the plan period which would meet the view of the majority of consultees

The regional review undertaken by English Heritage (West Midlands Farmsteads and Landscape Project) may impact upon policy direction with regard to conversions.

**Any new options to be considered before Submission?**

No new options put forward

**Any new evidence required?**

No new evidence required

<b>Question:32 Renewable energy - Energy</b>	<b>Qu: No:</b>
--	----------------

<b>Summary of Questionnaire responses (from associated report)</b>		
Do you agree with this policy direction?		
Yes	169	59%
Yes with minor changes	73	26%
No	43	15%
Total responses	285	

<b>Summary of free-write questionnaire comments received</b>	
Promote sustainable transport measures	2
Avoid the use of wind turbines, with respect to the impact on landscape	18
Protect local distinctiveness when considering renewable energy	2
Promote energy efficiency/conservation	13
Retrofit properties with energy efficiency measures	8
Ensure all new building is of high, energy efficient and sustainable design - in line with the CSH	28
Ensure business premises are of high, energy efficient and sustainable design	4
Encourage the use of a range of renewable energy methods	20
Ensure policy is specific, robust and flexible - with targets for renewable energy	31
Become a leading county in sustainability	4
Promote decentralised energy and CHP	3
Develop a small eco village	1
Promote the use of natural water sources such as springs	1
More evidence required	25
Encourage community renewable energy projects	4
Look at developing heat from waste for significant housing development	2
Develop an infrastructure charge which applies to water and sewage	1
Need a large investment in educating people to be energy concious	1
Need to consider the impact of peak oil	3
Need to identify suitable locations for renewable energy	4
Protect carbon sinks	1

**Summary of responses from Stakeholders**

**Natural England:** Need robust policy wording, and targets set for renewable energy in the county. Need also to promote retrofitting energy efficiency measures. Need also to look at climate change adaptation.

**WMRA:** Need to back policy with evidence of the viability of renewable energy technologies in the county.

**NFU WM:** Final policy must be flexible to cater for emerging technologies.

**CLA WM:** The CS should adopt the Merton rule. The CS should welcome renewable energy technologies in the open countryside, and should adopt a well managed approach to wind turbines. The CS should also welcome energy crops in rural areas whether in designated areas or not.

**Herefordshire FOE:** Ensure energy efficient and sustainable construction.

**AWM:** There is a need for a strategy to encourage decentralised energy.

**Environment Agency:** We would expect to see a policy relating to reduction in energy use within new development. We recommend that targets and design requirements are incorporated into the policy with reference to the CSH.

**English Heritage:** We suggest the preferred policy direction also gives some consideration to how the CS could promote opportunities for energy conservation and existing building stock, in addition to the design standards of new build.

**Malvern Hills AONB Partnership:** The Partnership is keen to encourage the wider use of microgeneration. The Partnership would wish to see the CSH more widely adopted in the AONB.

**National Trust:** Much will depend on the policy wording and the targets set.

**CPRE:** The suitability of sites for renewable energy schemes and the relative impact of such schemes can be highly localised, therefore indicating general areas for this would be counterproductive.

**Herefordshire Environment Partnership:** A significant emphasis should be placed on promoting community renewables and micro-renewables, also on energy conservation. In particular an assessment of the need for retrofitting should be undertaken to identify opportunities for developer contributions towards off-site compensatory works if total carbon emissions from the county are not to rise contrary to national reduction targets.

**Herefordshire Nature Trust:** All new housing design should incorporate energy saving features. The council should make energy consumption/saving a key factor in planning permissions.

**Herefordshire in Transition Alliance:** We need firm commitment to include such policies as those on energy efficiency in new buildings. Policies need to be more robust.

**Any new issues to be considered in HAP or MTRAP:**

Locations for renewable energy generation, in line with the findings of the Herefordshire Renewable Energy study 2010

**Any new options to be considered before Submission?**

To consider measures for 'adaptation' to climate change.

**Any new evidence required?**

A county wide study on the feasibility of renewable energy is currently underway.

**Question:33 Managing Flood Risk**

**Summary of Questionnaire responses (from associated report)**

Do you agree with this policy direction?

Yes	214	75%
Yes with minor changes	45	16%
No	28	10%
Total responses	287	

**Summary of free-write questionnaire comments received**

More enforcement needed with farmers to be responsible about land drainage	2
More flood defences needed and maintenance of existing	5
The option for small scale housing/development on flood plains with remediation measures should be considered	7
Need to be clear on who is responsible for SuDS	1
No housing in flood risk areas	35
Encourage use of grey water in new housing development	7
Need frequent maintenance of drainage ditches	8
Need to encourage the use of SuDS	3
More enforcement needed, especially with respect to developers	1
Water efficiency & collection measures are needed in new development	5
Need to consider the use of trees as a means to reducing flooding	2
Ensure new development is built in such a way so as to not increase flood risk - enforce design as appropriate	12
Rivers need dredging	2
Encourage development of SWMPs	7
Flood risk criteria in policy should be flexible around local circumstances	2
Flood alleviation measures must take into consideration potential impacts on archaeological resources	1
Must look at adapting to climate change, not just mitigating against it	2
Flood risk mapping must be accurate and updated as appropriate	1
Interdisciplinary working is a must	1
Look seriously at sustainable land management measures	4
Develop wet systems for the management of waste water and sewage	1

**Summary of responses from Stakeholders**

**Natural England:** Support the elements to be included in policy, such as SuDS, Surface Water Management Plans and adaptation to climate change

**Dwr Cymru Welsh Water** - The promotion of SuDS and surface water management plans are instrumental in mitigating against flooding.

**NFU WM:** New housing development must not be built in flood prone areas. SuDS are important. These should be retrofitted where possible.

**Herefordshire FOE:** Development in flood prone areas must not be allowed. Land beside rivers should be permanent pasture or amenity grassland. Must minimise the area covered in tarmac or concrete.

**English Heritage:** Policy on the design of development would be better integrated as part of the development focussed policies on housing and employment land.

**Malvern Hills AONB Partnership:** The CS needs to be integrated with the Severn River Management Plan to ensure that a whole catchment approach is taken to prevent flooding. Where possible, natural processes should be encouraged rather than relying on the construction of new flood risk management measures.

**Herefordshire Environment Partnership:** There are opportunities to address flood risk through off site works up-stream of settlements on a catchment/sub catchment wide basis through attenuation and storage measures. These might also have biodiversity and green infrastructure benefits. The Wye and Usk Catchment Flood Management Plan promotes such an approach.

**Herefordshire Nature Trust:** There are opportunities to address flood risk through off site works up-stream of settlements on a catchment/sub catchment wide basis through attenuation and storage measures. These might also have biodiversity and green infrastructure benefits. The Wye and Usk Catchment Flood Management Plan promotes such an approach.

**Any new issues to be considered in HAP or MTRAP:**

Once the Surface Water Management Plans are devised, then area specific measures can be taken to mitigate flooding as appropriate.

**Any new options to be considered before Submission?**

No new options to be considered at present

**Any new evidence required?**

The Water Cycle Study will be updated, and Surface Water Management Plans developed.

**Question:34 Water Resources**

**Summary of Questionnaire responses (from associated report)**

Do you agree with this policy direction?

Yes	218	79%
Yes with minor changes	40	14%
No	19	7%
Total responses	277	

**Summary of free-write questionnaire comments received**

Ensure that proposals to manage water are carried out at plan level	1
Ensure that methods used in homes to manage water do not make homes unaffordable	2
All new development proposals must be conditional on resolving water issues	18
Any new housing development must not deplete the rivers of water	7
Encourage the use of water meters	5
Need to include a specific and separate water policy in the CS, not absorb it into the local distinctiveness policy	1
Avoid development close to rivers and their flood plains	1
Need to recognise the role of trees in water resource management	1
Robust and enforceable measures needed to control water use	3
Ensure that sewerage capacity can cope with new development	2
Do not lose local distinctiveness through the use of new materials and design	1
Encourage the use of grey water	1
Develop a drainage replacement programme to replace existing pipes	1
Improve the maintenance of drainage ditches	1

**Summary of responses from Stakeholders**

**Dwr Cymru Welsh Water** - promote policy for reduced water use, water efficiency and sustainable drainage solutions. Promote the retrofitting of sustainable drainage or water efficiency systems. Infrastructure may need to be in place prior to new development therefore early engagement with service providers will be necessary.

**Herefordshire in Transition Alliance** - Until investigations are carried with respect to water conservation and efficiency, further housing in the county cannot be promised.

**Transition Hereford** - If there is any likelihood of water shortage in the future, the precautionary principle dictates that water shortage systems should be an integral part of any new development, as well as retrofitting wherever possible.

**English Heritage** - We suggest that policy direction directly relating to sustainable design should be integrated as part of the development focussed policies on housing and employment rather than those that look at local distinctiveness.

**CPRE** - This policy direction should make it clear that new housing will not be permitted in any particular location unless it can be shown that it will not have an adverse effect on the Wye SAC. There is a limit as to how much water can be extracted into the Wye river system, and how much sewerage can be pumped into it. We are concerned that the paper does not make this explicit enough. More information is required from the Water Cycle Study to better understand the true extent of these issues. The emerging CS will not be sound until the extent of water constraints are resolved.

**Herefordshire Environment Partnership** - It is imperative that the timing of essential investments ensures measures are in place ahead of development. This is fundamental to the environmental quality vision in the CS. There may well be a need for retrofitting water meters and other efficiency measures/devices in existing developments in order to accommodate further development. New employment sites may have to preclude those with heavy use of water. Account should be taken of the advice and standards set out for eco-homes.

**Herefordshire Nature Trust** - New housing provision may have to make provision for parallel works to existing houses for the purpose of retrofitting water efficiency measures, which should be achieved through developer contributions.

**Any new issues to be considered in HAP or MTRAP:**

Any appropriate actions recommended as a result of the findings of the Surface Water Management Plans will be implemented as part of the area specific Hereford Area Plan and Market Towns & Rural Areas Plan.

**Any new options to be considered before Submission?**

No new options to be considered at present

**Any new evidence required?**

An update to the Water Cycle Study is required.  
Surface Water Management Plans are being devised for Hereford and Leominster

<b>Question:</b> Local Distinctiveness. Do you agree with the policy direction? What do you not agree with and why?	<b>Qu: Nu:</b> 35 a) b)
<b>Summary of Questionnaire Responses (from associated report)</b>  Total number of responses: 270 Yes: 208 (75%) Yes with minor changes: 40 (14%) No: 8%	
<b>Summary of free-write questionnaire comments received</b>  As noted above, there is a high level of support for the preferred options. Of those not in agreement with the preferred options or seeking minor changes, the main reasons for their decision are outlined below. <ol style="list-style-type: none"> <li>1) <u>Local distinctiveness is not compatible with the scale of development proposed:</u> The level of housing development proposed continues previous levels of housing completions. Furthermore the SHLAA will identify the capacity and constraints of residential land and it is accepted that not all settlements can accommodate the proposed growth because of environmental reasons. However, growth can continue within Herefordshire which, controlled through design and local distinctiveness policies, will not have a detrimental impact upon the wider natural and built environment..</li> <li>2) <u>Policy should not be unduly restrictive against use of new designs and materials:</u> The policy does not seek to stop innovation in design and materials and this can be seen through advocating the introduction of new design standards that promote new energy efficient development techniques. The policy is seeking that development is compatible with its locality.</li> <li>3) <u>Specific policy should be included for AONB:</u> While it is accepted that the AONB designations within Herefordshire are important and policy will support their preservation, AONB are only part of what the Local Distinctiveness policy is seeking to conserve and enhance. The Core Strategy is aimed at providing overarching strategies and AONB designations can be further examined in the MTRAP.</li> <li>4) <u>Too much use of plastic tunnels in the countryside:</u> The core strategy acknowledges the important role of agriculture in the rural economy and as such policies have to ensure that rural employment remains viable. However, a balance must be obtained between agricultural viability and the impacts upon the landscape and the wider environment.</li> <li>5) <u>Settlement boundaries and settlement patterns are an important part to local distinctiveness:</u> While a number of settlements have developed organically over a number of decades, the use of settlement boundaries will be examined as part of the MTRAP. The location of future development will be guided by background evidence which has examined site constraints and capacity. Furthermore the impacts of such development can be controlled through design and local distinctiveness policies amongst others.</li> <li>6) <u>The policy is too vague and does not provide satisfactory protections for the existing natural and built environments:</u> The policy is designed to provide an overarching guide to local distinctiveness. Specific issues and themes will be examined in subsequent DPDs.</li> </ol>	

## Summary of responses from Stakeholders

English Heritage: Supports the preferred options subject to minor changes. English Heritage acknowledge the broad nature of the policy to reflect the interrelated issues but wish to see greater prominence given to the historic environment based on a range of regional and local studies undertaken. It is also recommended that the core strategy adopts the following considerations in the local distinctiveness policy;

1 - How those aspects of the historic environment considered to contribute to the distinctive identity of Herefordshire will be safeguarded and enhanced.

2 - How threats to heritage assets will be managed and used to deliver spatial objectives.

3 - How the evidence base will influence policy.

Officer comments = The historic environment forms only part of the local distinctiveness policy and policy is being informed by the listed evidence base. The role of the core strategy is to provide a broad strategic overview with specific detail to be covered in the subsequent DPDs. The suggested components of the strategy will be examined in as part of both the core strategy and subsequent DPDs.

WMRA: Provides no definitive answer on the preferred option but WMRA do recognise the overarching principle of the local distinctiveness policy and is in general accordance with the RSS.

Environment Agency: Provides no definitive answer on the direction of the preferred option but wishes to see greater awareness of impact of development on water resources as a number of water sources in Herefordshire have special designations. The Place Shaping Paper notes the number of Special Areas of Conservation and any development within or adjacent to these areas will have to undergo a rigorous assessment examining the impacts on these designations.

Malvern Hills AONB Partnership: Provides no definitive answer on the direction of the preferred option but wishes to see greater awareness of the implications on AONB. It is preferred that a specific policy is introduced regarding protecting AONB against development within the Core Strategy. AONB designations are sought to be conserved and enhanced within the Local Distinctiveness policy though site specific matters will be covered within the MTRAP.

CPRE: Does not support the direction of the preferred options within the Place Shaping Paper as they do not agree with integrating all natural and built environments into one overarching policy. Each element should have a distinct separate policy. CPRE also wish to see specific landscape designations guided by landscape character assessments. Furthermore local designations should be used to protect those designations that could in the future become AONBs, e.g. Black Mountains, Golden Valley and North West Herefordshire Hills. Designating AONBs is outside the remit of Local Planning Authorities and site specific issues will be examined in the MTRAP. An overarching policy is in accordance with regional planning policy and the individual elements can be examined in greater detail in subsequent DPDs, where their designation has more of an impact on site specific policies.

NFU: Provides no definitive answer on the direction of the preferred option but, while acknowledging the importance of the local distinctiveness policy, the policy should not be too restrictive to be detrimental to the rural economy. It is noted that agriculture is essential to the long-term viability of the rural economy and sufficient flexibility will be provided to ensure that this remains.

CLA: Provides no definitive answer on the preferred option but advocates a flexible approach to both new and old buildings. CLA wish to see a specific policy on historic environment which provides a proactive approach to reusing land and buildings. The historic environment is part of the local distinctiveness policy and the core strategy does outline how Herefordshire Council wish for vacant premises and land to be utilised.

Parish and Town Councils: Of the comments received from Parish and Town Councils, only two negative responses were received which focused around local distinctiveness not being compatible with the scale of development being proposed within the Place Shaping Paper - please see point 1 above.

National Trust: Supports the preferred options

Natural England: Supports the preferred options and wishes to be involved in the consultation process on design policy.

Sport England: Supports the preferred options

**Any new issues to be considered in the HAP or MTRAP:**

Specific reference should be given to important local characteristics, even if not nationally recognised, e.g. AONB, SACs, SSSIs but also not all SAMs are nationally recognised, not because they do not meet classification standards but rather because of insufficient resource by Government Agencies.

**Any new options to be considered before Submission?**

Wording needs to be clear and coherent as a number of individual elements are to be covered within the Local Distinctiveness policy. Each element should be noted within the supporting text for clarity.

The impact of regional and local studies undertaken by independent and Government agencies.

**Any new evidence required?**

<b>Question:</b> Design. Do you agree with the policy direction? What do you not agree with and why?	<b>Qu: Nu:</b> 36 a) b)
<b>Summary of Questionnaire Responses (from associated report)</b>  Total number of responses: 253 Yes: 193 (76%) Yes with minor changes: 34 (13%) No: 26 (10%)	
<b>Summary of free-write questionnaire comments received</b>  As outlined above, there was a very high level of support for the preferred options contained within the Place Shaping Paper. However, a number of key themes were noted on the negative responses and those seeking minor changes. <ol style="list-style-type: none"> <li>1) <u>The proposed increase in housing will lead to an increase in crime irrespective of design principles.</u> Government guidance shows a number of successful techniques in how design principles can deter criminal activity, even in high density new developments. Such ideas as clearly delineating public and private boundaries, increase in natural surveillance and removal of bottle-necks can decrease criminal activity and anti-social behaviour.</li> <li>2) <u>Developers will continue to deliver the current style.</u> There is national requirements to meet design standards in order to meet climate change targets and as such the policy within the Place Shaping Paper is not introducing too arduous an approach. Furthermore national planning policy is seeking that local planning authorities utilise local characteristics for wider benefits and this is the basis for the local distinctiveness policy.</li> <li>3) <u>Protect natural as well as the built environments:</u> The local distinctiveness policy specifically outlines the positive value of environmental land designations.</li> <li>4) <u>Too restrictive and will stop innovation:</u> While acknowledging and preserving historical characteristics, the design policies also focus around incorporating design standards. These standards promote sustainable techniques and materials that can be complementary to existing design characteristics of a locality.</li> <li>5) <u>Greater reference to green infrastructure:</u> Responses request that there's a need for increased reference of green infrastructure and soft landscaping in order to decrease the visual impacts of new development. The Place Shaping Paper does strongly emphasise that where appropriate, development will be expected to contribute and enhance Herefordshire's green infrastructure.</li> <li>6) <u>Design policy needs to be shaped by ongoing regional reports:</u> Need to include a number of ongoing/completed reports and Village Design Statements. English Heritage and Malvern Hills AONB are in the process of completing a series of studies and guidance notes while Llangrove PC have recently adopted their Village Plan.</li> </ol>	
<b>Summary of responses from Stakeholders</b>  <u>English Heritage:</u> While generally supporting the preferred option and the proposed preparation of a Design Code SPD, a change was suggested in that design considerations are applied to other relevant policies. The Place Shaping Paper does iterate that on applicable policies design will be an important criterion. English Heritage are wishing to input into the SPD based on its relevance to various forthcoming characterisation initiatives.	

<p><u>Natural England:</u> Supports the preferred options. However, Natural England wishes to see greater reference to the positive impact design can have upon climate change. The preferred options does refer to introducing design standards that themselves contain techniques to reducing the impact of new developments on climate change.</p> <p><u>West Mercia Police:</u> While not providing a definitive answer, they do promote the policy to be based on 'Designing out opportunities for crime and anti-social behaviour in accordance with best practice as highlighted within 'Safe Places' and 'Secured by Design'. Working with partners in the Community Safety partnership on initiatives to reduce crime and anti-social behaviour.' The final policy will be constructed in line with all national and regional guidance.</p> <p><u>Hereford and Worcester Fire and Rescue Service:</u> No definitive answer is provided. They advocate that a high level of accessibility for emergency vehicles must be included within design of settlements alongside the provision of sufficient utilities to cope with an emergency (e.g. water pipes). Access throughout new developments is vitally important for the emergency services and the wording of policy needs to reflect the potential impact upon the services. Developer contributions for utility improvements will be sought where necessary.</p> <p><u>Town and Parish Councils:</u> Of the responses received from parish and town councils (36), only one negative comment was received stressing the need for new developments to be sympathetic to existing older properties. As outlined in paragraph 7.23, high quality of design fosters civic pride and as such ensuring new developments are compatible to their surroundings is essential to securing the objectives of local distinctiveness.</p> <p><u>National Trust:</u> Supports the preferred option</p> <p><u>Duchy of Cornwall:</u> Supports the preferred option</p> <p><u>Sport England:</u> Supports the preferred option</p>
<p><b>Any new issues to be considered in the HAP or MTRAP:</b></p> <p>Review of the AONB guidance notes and English Heritage studies to note potential impact upon design policy for site specific design implications.</p>
<p><b>Any new options to be considered before Submission?</b></p>
<p><b>Any new evidence required?</b></p> <p>Review of the AONB guidance notes and English Heritage studies to note potential impact upon design policy for overarching strategic design implications.</p>

<b>Question:</b> Movement in Herefordshire	<b>No: 37a</b>
<p><b>Summary of Questionnaire responses (from associated report)</b></p> <p>Majority of respondents agreed with the policy direction</p>	
<p>Total responses: 282  Yes: 187 (66%)  Yes with minor changes: 69 (24%)  No: 26 (9%)</p>	
<p><b>Summary of free-write questionnaire comments received</b></p> <p>Building new roads would merely exacerbate traffic congestion  No need for a Hereford relief road  Demonstrable need for a Hereford relief road  Consider car usage in a positive way  Difficult for people living in rural areas to avoid the private car  Private car is a necessity for reaching tourist attractions  Integrated public transport must be readily available throughout the County  More emphasis on car share and providing transport for school children  More emphasis on Park and Ride  PROWs must be accessible  Improve and maintain PROWs  Need to re-open branch lines  Need to twin-track the Hereford-Ledbury railway line  Support the movement of freight by rail</p>	
<p><b>Summary of responses from Stakeholders</b></p> <p><b>Natural England:</b> Support policy direction, especially the elements related to walking and cycling. Greater clarity required on how the challenging issues in rural areas will be addressed. Doubts over relationship between this policy direction and the relief road option. Concerns about funding.</p> <p><b>WMRA:</b> Preferred spatial strategy directly addresses the cross cutting theme of climate change by limiting development outside of Hereford, the market towns and certain villages. Reducing the need to travel in the first place is going to be the best long-term strategy for tackling climate change given that 50% of residents' rely on car travel.</p> <p><b>Highways Agency:</b> Keen to progress work on developing a package of effective and deliverable sustainable transport measures. Please that all consultations to date recognise the need for sustainable transport measures.</p>	

**English Heritage:** Policy should promote enhancements in the quality of the wider public realm in order to encourage greater uptake of walking and cycling.

**Any new issues to be considered in HAP or MTRAP:**

Clarify the meaning of the term Travel Plans  
Improving access to tourist-related developments by public transport

**Any new options to be considered before Submission?**

**Any new evidence required?**

Hereford Relief Road Study (Amey, 2010)

<b>Question:Infrastructure Delivery</b>	<b>Qu: No: 38b</b>																						
<p><b>Summary of Questionnaire responses (from associated report)</b>  Total number of responses: 251  Agree with policy direction: (166) 66%  Agree with minor changes (49) 20%  Disagree with policy direction: (36) 14%</p>																							
<p><b>Summary of free-write questionnaire comments received</b></p> <table border="0"> <tr> <td>Policy needs clarification re types of infrastructure and transparency</td> <td style="text-align: right;">30</td> </tr> <tr> <td>CIL and S106 would be too onerous and impact on viability/quality</td> <td style="text-align: right;">25</td> </tr> <tr> <td>Don't spend all contributions on relief road</td> <td style="text-align: right;">15</td> </tr> <tr> <td>Need to focus on affordable housing</td> <td style="text-align: right;">9</td> </tr> <tr> <td>Support</td> <td style="text-align: right;">8</td> </tr> <tr> <td>Infrastructure gains should relate to locality</td> <td style="text-align: right;">6</td> </tr> <tr> <td>Need to tie in with phasing policy</td> <td style="text-align: right;">6</td> </tr> <tr> <td>Should not apply to employment land/rural employment</td> <td style="text-align: right;">4</td> </tr> <tr> <td>Need better transport links</td> <td style="text-align: right;">4</td> </tr> <tr> <td>Don't need houses in first place</td> <td style="text-align: right;">3</td> </tr> <tr> <td>Not keen on charging schedule</td> <td style="text-align: right;">1</td> </tr> </table>		Policy needs clarification re types of infrastructure and transparency	30	CIL and S106 would be too onerous and impact on viability/quality	25	Don't spend all contributions on relief road	15	Need to focus on affordable housing	9	Support	8	Infrastructure gains should relate to locality	6	Need to tie in with phasing policy	6	Should not apply to employment land/rural employment	4	Need better transport links	4	Don't need houses in first place	3	Not keen on charging schedule	1
Policy needs clarification re types of infrastructure and transparency	30																						
CIL and S106 would be too onerous and impact on viability/quality	25																						
Don't spend all contributions on relief road	15																						
Need to focus on affordable housing	9																						
Support	8																						
Infrastructure gains should relate to locality	6																						
Need to tie in with phasing policy	6																						
Should not apply to employment land/rural employment	4																						
Need better transport links	4																						
Don't need houses in first place	3																						
Not keen on charging schedule	1																						
<p><b>Summary of responses from Stakeholders</b></p> <p><b>Welsh Water</b> - Support</p> <p><b>West Mercia Police</b> - Police infrastructure and that of other emergency services should be provided as part of CIL</p> <p>Natural England - Need to ensure new road infrastructure does not get all the money when green infrastructure is essential too. Houses should be phased to bring forward Pand R and transport hub first.</p> <p>English Heritage - Policy should allow for developer contributions to support environmental enhancements in addition to housing and transport.</p> <p><b>AONB</b> - Developer contributions towards improvements required due to increased recreation pressure in AONB from growth.</p> <p><b>CPRE</b> - Should include phasing element requiring infrastructure to be in place in early stages of development.</p> <p><b>NFU</b> - Could stifle development in rural areas</p>																							

**Any new issues to be considered in HAP or MTRAP:**

Local community aspirations for infrastructure

**Any new options to be considered before Submission?**

Not to have CIL and/or Planning Obligations?

Have a different charge for business?

Have different charges in different areas?

Make gains locally specific?

**Any new evidence required?**

Economic Viability Study

SHLAA

Housing Trajectories

<b>Question:</b> Do you agree with the policy direction for Waste?	<b>Qu: No:</b> <b>39</b>
--	-----------------------------

**Summary of Questionnaire responses (from associated report)**

Yes: 16 (23%)  
 Yes with minor changes: 46 (65%)  
 No: 9 (13%)

Question 39a not answered - but free-write comments made = 2

Total responses = 73

**Summary of free-write questionnaire comments received**

There was general support for the policy direction, and many comments welcoming recent changes to domestic waste collection (i.e. the introduction of wheelie bins for recyclables).

There were concerns about the use of incineration, albeit there are no proposals for a site for incineration of municipal waste in Herefordshire (although that may well be part of the solution to waste treatment outside the County.)

There was general support for treatment of biodegradable waste by means of Anaerobic Digestion - although one contrary option was recorded.

The principle of energy-from-waste was supported by several respondents.

Several comments were received suggesting the need for a household waste site to serve the north side of Hereford.

Could the household waste sites include a "Freecycle" facility?

There was general support for more re-use and recycling of waste materials.

Steps should be taken to reduce "waste miles" - e.g. by reducing the need to transport waste across county boundaries. Herefordshire should neither import nor export waste.

## **Summary of responses from Stakeholders**

### **Environment Agency.**

Detailed comments in respect of the following:

- 1) strongly support the need for a dedicated Development Plan Document devoted to Waste and/or Minerals and Waste.
- 2) Need to indentify some specific sites where the strategy depends on it.
- 3) Need to establish criteria for planning applications for waste developments
- 4) Greater recognition of the waste hierarchy is required to direct overall policy direction
- 5) The relationship between climate change issues and waste policy should be more explicit.
- 6) Need to give more emphasis to treating waste as a resource rather than a problem, and to "de-couple" waste from growth
- 7) An explicit commitment is needed to reducing waste volumes going to landfill
- 8) Objective 6 (of the Core Startegy Objectives) is also relevant
- 9) There is an issue over Herefordshire being a net exporter of waste
- 10) There are no specific proposals for dealing with agricultural waste in the Policy Direction
- 11) There is a need for specific targets and to comply with the National Waste Strategy
- 12) A commitment to Site Waste Management Plans would be beneficial for sites smaller than that required by the Site Waste Management Regulations
- 13) There should be closer links to policies intended to promote social welbeing and provision needs to be made for waste storage in all developments

### **Town Councils and Parish Councils**

Where town and parish councils responded they were gereally supportive of the policy direction but wished to see more recycling opportunities and facilities. Facilites for collection of bulky goods should be improved. One parish council obected to an anticipated proposal for an anaerobic digester.

### **Malvern Hills AONB Partnership**

Noted that no suite specific proposlas were being made in the AONB but felt that broad locations should be identified outside the AONB.

## **Any new options to be considered before Submission?**

Explicit recognition needs to be given to the national Waste Hierarchy and, most importantly, targets need to be introduced for reduction of waste going to landfill. Criteria for broad locations need to be set out wherever possible. Anearobic Digestion should be promoted as a means of dealing with and getting value from biodegradeable waste.

**Any new evidence required?**

No - other than updating latest figures (through the Regional Technical Advice Body for waste) and confirmation of progress with the Herefordshire and Worcestershire Joint Municipal Waste Strategy. Data for other waste streams is more variable in quality and availability. Links with Minerals Policies in respect of the use of secondary aggregates needs to be recognised although data is not readily available..

<b>Question:</b> Do you agree with this policy direction?	<b>Qu No:</b> <b>40</b>
---	----------------------------

**Summary of Questionnaire responses (from associated report)**

Number of responses:  
 Yes: 9 (33%)  
 Yes with minor changes: 11 (41%)  
 No: 7 (26%)

Question 40a not answered (but free-write comments made): 13

Total responses: 40

**Summary of free-write questionnaire comments received**

The following themes emerged from the responses:

- 1: There was strong support for recycling of minerals such as construction and demolition wastes
- 2: Minerals sites should be restored to afteruses which were conducive to biodiversity
- 3: There was concern over the impact of transport of minerals by road - noting that minerals should be sourced from as close to their point of use as practicable.
4. The principle of Minerals Safeguarding Areas was supported - along with the related concept of preserving minerals where possible.
- 5: Need for cross border/regional awareness of needs
- 6: Need to consider minerals other than aggregates
- 7: Need to allow for small scale operations
- 8: objections to re-opening some currently inactive sites, especially Upper Lyde.
- 9: concerns about the impact of minerals workings in the Lugg Valley on archaeological interests.
- 10: Those who answered "No" were mostly concerned at scale of growth generally and objected to the minerals policy direction on the basis that if fewer houses were built then the need for minerals would be reduced.

## **Summary of responses from Stakeholders**

Natural England: Supportive of the policy direction particularly in respect of allowing for habitat creation as an integral part of after use of minerals sites. Concerned to ensure that minerals extraction does not damage the interests to be protected through the Green Infrastructure Strategy. Concerned that design policies should encourage the minimisation of the use of primary aggregates. Supports the use of secondary aggregates.

English Heritage: Concerned that the use of local stone is supported, especially for heritage restoration, and concerned that the archaeological resource is not necessarily impacted by minerals workings.

West Midlands Regional Assembly: Support.

Minerals Producers Association: General support including support for MSAs. Support for the use of secondary aggregates. Concern that apportionments and landbanks are assessed realistically.

### **Any new issues to be considered in HAP or MTRAP:**

None raised directly - but the question of any new allocations will need to be addressed through the anticipated Minerals and waste SPD.

### **Any new options to be considered before Submission?**

No - but allowance needs to be made for changes to regional policy.

### **Any new evidence required?**

None beyond the evidence that comes forward annually in the Annual Monitoring Report and the Regional Aggregates Working Party Annual Monitoring Report.

<b>Question: 41 - Maintaining employment land supply</b>	<b>Qu: No:</b>
--	----------------

<b>Summary of Questionnaire responses (from associated report)</b>		
Do you agree with this policy direction?		
Yes	187	76%
Yes with minor changes	43	18%
No	15	6%
Total responses	245	

<b>Summary of free-write questionnaire comments received</b>	
Promote mixed land use	2
Be flexible in employment land designations	1
Have regard to water use and habitats	1
Develop sites only as others are filled (use vacant sites)	4
Ensure local distinctiveness is retained	1
Reuse poor sites ie. for housing	5
Promote Moreton on Lugg	5
Promote Leominster	1
Provide employment sites in rural areas	3
Ensure land is available for new business wishing to locate	2
Protect employment land	5
More freehold land required	1
Use brownfield locations	4
Relate new sites to existing infrastructure	6
Provide land for ICT, Tourism & food and drink industries	1
Increased marketing of employment land sites needed	1
Use criteria to assess quality and need of employment land	4
Promote the adaptive reuse of buildings for employment purposes	1
Determine the need for employment land in the longer term	2
Promote rural diversification	1
Allocate areas adjoining M50 corridor	1

<b>Summary of responses from Stakeholders</b>
None listed

**Any new issues to be considered in HAP or MTRAP:**

No new issues, but will need to consider appropriate employment land sites in accordance with the updated ELR and the SHLAA.

**Any new options to be considered before Submission?**

No

**Any new evidence required?**

An update to the 2009 ELR

<b>Question: 42 - Employment land provision</b>	<b>Qu: No:</b>
---	----------------

<b>Summary of Questionnaire responses (from associated report)</b>		
Do you agree with this policy direction?		
Yes	173	71%
Yes with minor changes	52	21%
No	20	8%
Total responses	245	

<b>Summary of free-write questionnaire comments received</b>	
More employment needed	3
Increase focus on tourism	2
Increase focus on agriculture	6
Increase focus on home-working	2
Increase focus on manufacturing	4
Keep smaller sites	2
Employment needed in rural areas	4
Have regard to water use and habitats	3
Be flexible in areas for employment land designations	5
Do not over emphasise the need for office space	3
Reuse empty premises and vacant land first	3
Need freehold land	1
Encourage links between business and education	1
Adopt a longer term view of employment needs	2
Relate to existing infrastructure to reduce car dependence	12
Focus on more on lugg	2
Use brownfield land	6
Encourage new business	3
Encourage mixed use	1

**Summary of responses from Stakeholders**

**Natural England:** Promote live/work units

**Transition Leominster:** Current office space is available but underused

**AWM:** Need flexibility when using criteria for assessing the potential for employment land release to ensure that the most appropriate and valuable employment sites are available for the growth of the economy. Future development should be focussed in BF land for both housing and employment. There should be a range of employment sites to help meet demand at lower end of market. There will be a need for employment sites to match the move away from manufacturing industries.

**Any new issues to be considered in HAP or MTRAP:**

No new issues, but will need to consider appropriate employment land sites in accordance with the updated ELR and the SHLAA.

**Any new options to be considered before Submission?**

No

**Any new evidence required?**

An update to the 2009 ELR

<b>Question:</b> Education and Skills	<b>No:</b> 43a
---------------------------------------	----------------

**Summary of Questionnaire responses (from associated report)**

Majority of respondents agreed with this policy direction

Total responses: 274  
Yes: 182 (66%)  
Yes with minor changes: 58 (21%)  
No: 34 (12%)

**Summary of free-write questionnaire comments received**

Need better agricultural training  
School closures in rural areas will force parents to drive their children to school  
Public spending is unable to support the higher education expansion policy  
Concentrate on the provision of technical colleges and vocational training  
Concentration of basic education 5-18 with exceptions of agriculture and tourism  
University's survival would be dependent on the provision of appropriate infrastructure  
Expand the art and technical colleges instead of building a new university  
Education in organic agriculture and horticulture is especially important  
Plans to provide a university are unrealistic  
Not clear whether higher or further education is referred to  
Need to better maintain good village schools and improve poor secondary schools  
More emphasis on apprenticeships  
Need to provide high-tech jobs for recent university graduates  
Need to provide improved vocational courses and make certain trades more attractive  
Possible link to Open University as county is not big enough to support a university itself  
Very important to keep our talented youngsters in the county  
Do more to encourage young people to enter agricultural occupations  
Education and skills training must be of a high and specialist standard  
Not convinced that a university would be beneficial  
Investment in education should be centred around vocational courses not academic ones  
Consider providing HE/university education through virtual facilities  
Provide rural communities with distance learning opportunities  
Develop a technical college that directly relates to local employment needs  
Must go for university status  
Need to extend remote learning opportunities  
Need to provide education and skills training for people of all ages  
Ensure local people can read, write and do their arithmetic first  
Primary and secondary schools should receive greater attention  
Schemes directly linked to employment would be more beneficial  
Too much emphasis on Hereford  
Must ensure courses meet employment needs  
More needs to be done to attract post-graduates back to the county  
Need to encourage links between business and education  
Hereford needs an industrial base to support skilled employment  
Benefits that the green economy would bring to the county should be maximised

**Summary of responses from Stakeholders**

**Natural England:** Policy should build on the county's strengths, such as agriculture

**WMRA:** Policy direction supports policy PA4 of the RSS

**AWM:** Welcomes the aspiration to create a more adaptable and skilled workforce

**Any new issues to be considered in HAP or MTRAP:**

Promotion of Hereford as a University gateway

**Any new options to be considered before Submission?**

Policy on Social and Community Infrastructure

**Any new evidence required?**

**Question:44 Tourism, Culture and Leisure**

**Summary of Questionnaire responses (from associated report)**

Do you agree with this policy direction?

Yes	204	72%
Yes with minor changes	68	24%
No	11	4%
Total responses	283	

**Summary of free-write questionnaire comments received**

Do not spend too much money on promoting tourism	1
Need a new tourist or cultural attraction	1
Tourism needs more emphasis	7
Need to balance agriculture with tourism	2
Keep Herefordshire clear of litter	1
Improve the state of repair and enhance roads and footpaths	4
Utilise the rivers, canals and natural environment as a driver for tourism	6
Look outside of Hereford City and the RSC for tourism - for example Goodrich	2
Need to determine what are the key attractions pulling people to the county	2
Need a 2nd swimming pool	1
Need to develop quality visitor accomodation	1
Promote tourism businesses by not placing large taxes on them	1
Promote Ross as the Gateway to Herefordshire	1
Improve the appearance of Hereford's shopping centre	1
Restrict new visitor accomodation in the countryside to the reuse/conversion of traditional buildings	1
More Police presence after dark in Hereford centre	1
Retain Tourist Information Centres	1
Promote local events to those outside of the county	1

**Summary of responses from Stakeholders**

**West Mercia Police** - Should included a policy on the evening and nighttime economy covering the whole county.

**Any new issues to be considered in HAP or MTRAP:**

Locations for new visitor attractions as appropriate.  
Consider how to best accommodate the evening economy, in both Hereford and the market towns.

**Any new options to be considered before Submission?**

To develop new sustainable visitor attractions in the county, that reflect and enhance the county's local distinctiveness and historic environment.

**Any new evidence required?**

A more detailed study on tourism in Herefordshire County. Currently information on tourism is very limited.

**Question:** Housing Density. Do you agree with this policy direction? Please explain any changes or things you do not agree with and why.

**Qu: No:**  
45a & 45b

**Summary of Questionnaire responses (from associated report)**

Total number of responses: 291  
Yes: 155 (53%)  
Yes with minor changes: 84 (29%)  
No: 52 (18%)

**Summary of free-write questionnaire comments received**

	<b>No. of comments made</b>
<b><u>Higher densities wanted.</u></b>	
Need higher densities. It is environmentally beneficial & more sustainable.	11
Detached housing should be discouraged.	3
<b><u>Higher densities wanted, but some concerns.</u></b>	
If higher densities, need very good design and quality developments that respect local character.	18
Need to provide more open space if higher densities.	9
Need allotments if building at higher densities.	8
Higher density developments must be 'green'.	3
<b><u>Lower densities wanted.</u></b>	
Lower densities wanted - social wellbeing/health/avoid slums of the future/more space = happiness/avoid overcrowding.	19
Lower densities wanted - to reflect rural nature of county & on edge of city sites.	15
Lower densities wanted - need garden for families.	12
Lower densities wanted - need space to grow own food.	9
Lower densities wanted - too many houses proposed.	7
Lower densities wanted.	7
Lower densities wanted - need more car parking spaces.	6
Lower densities wanted - ensure enough jobs & infrastructure to support higher densities (incl. fire stations).	6
Lower densities wanted - to respect character & achieve good design.	5
Lower densities wanted - it is unsustainable to build at higher densities.	3
Lower densities wanted - to reflect lower population in Herefordshire.	2
More detached, large executive housing at lower densities wanted.	2
Roads are too narrow on dense housing estates.	2
No more infilling in rural areas, to protect character & attractiveness to tourists.	1
<b><u>Other</u></b>	
Densities should be dealt with on a site-by site basis, allow for flexibility, & respond to differing site characteristics & need.	14
Need more information on site specific densities.	8
Need more affordable & rented homes and houses for the elderly.	6
Need to complete LHMA and any other assessments and reconsult on densities afterwards.	5
Need local support for density proposals.	2
Use empty properties before building new dwellings.	1
Control population growth, do not build more houses.	1
Green infrastructure requirements must be taken into account.	1

**Summary of responses from Stakeholders**

**Character, design, local support, overcrowding**

**Transition Hereford, Sutton St Nicholas Parish Council, Walford Parish Council, Colwall Parish Council, Pyons Group Parish Council, Bromyard & Winslow Parish Council, Leominster Town Council, Ledbury Town Council, Cradley Parish Council, English Heritage, Fownhope Parish Council, Holmer & Shelwick Parish Council**

Many stakeholders had a number of concerns about high density developments. Issues raised related to: more emphasis on protection of local character, including use of characterisation studies, especially in rural areas, ensuring high quality design, integrated & sustainable developments, having local support for housing proposals, avoiding overcrowding, putting an end to in-fill development to preserve character & touristic appeal of towns & villages, no densities over 40 per ha.

**Flexibility on density requirements**

**West Midlands Planning Consortium c/o Tetlow King Planning**

CS should allow flexibility to allow for specific circumstances.

**Dormington & Mordiford Group Parish Council**

30 per ha guide should be flexible.

**Allotments, open space & adequate car parking spaces**

**Dormington & Mordiford Group Parish Council, Aconbury Parish Council**

Include allotment & green space and adequate car parking space until car use has reduced.

**Up to date evidence base & housing need data**

**West Midlands Planning Consortium c/o Tetlow King Planning, Cycle Hereford**

CS should allow use up to date housing need data. Need up to date evidence base before density policies are produced.

**More info needed to make comments**

**SHYPP Kemble Housing Association**

Need more info on specific densities to make a comment.

**More affordable homes to meet needs**

**Ross Town Council**

Affordable & rented houses are needed.

**Strategic housing sites too large**

**Putson Community Association**

The CS sites are too big.

**Infrastructure requirements**

**Hereford & Worcester Fire & Rescue Service**

The impact of large-scale, concentrated development in key locations needs to be considered in relation to the capacity of existing fire station to respond to emergencies & maintain/improve attendance times.

**Lower Bullingham Parish Council**

Highways should look at spine roads in estates. These should be wider for emergency vehicles and ensure adequate road safety.

**Natural England**

Consideration should be given to the green infrastructure requirements & on site implications for housing densities.

**New Issues to be considered in Core Strategy**

**PPS3 Housing (2000) has been replaced by PPS3 Housing (June 2010).**

Minimum density requirements have been dropped. Local planning authorities may now set out a range of densities across the plan area, rather than one broad density range. Good design & layout, respecting local features and character and quality developments are key considerations. Making efficient use of land is important however, this does not mean that the quality of the local environment should be compromised. LPA's should also develop residential parking policies in their areas, taking into account expected levels of car ownership, the importance of promoting good design & the need to use and efficiently.

The CS preferred policy direction was to have a general policy on efficient use of land. This is set out as a key consideration in PPS3, so would be unnecessary repetition.

The specific density requirements for specific sites or parts of the county will be set out in the HAP/MTRAP.

The need to emphasise the protection of the landscape and built character of a areas and not over intensify development to the detriment of good design and quality is an issue which needs to be addressed. However, the Local Distinctiveness policy may be the more appropriate route for such issues to be addressed through the CS and density could be mentioned here.

It is considered that the density policy as suggested for the CS is no longer necessary and that the HAP & MTRAP, along with development briefs/masterplanning would be the more appropriate vehicles for density issues.

**Any new issues to be considered in HAP or MTRAP:**

New PPS3 (June 2010) has no minimum density requirements and altered guidance on density issues (see above for detail).

**Any new options to be considered before Submission?**

Option of not having a density policy at all in the CS. The Local Distinctiveness policy could cover issues such as the need to preserve character (see above) and HAP/MTRAP and development briefs/masterplanning will address densities on specific sites or in certain areas.

**Any new evidence required?**

No

<b>Question:</b> Housing type and mix, do you agree with the policy direction?	<b>Qu: Nu:</b> 46 a) b)
<b>Summary of Questionnaire Responses (from associated report)</b>	
<p>Total responses: 285  Yes: 195 (68%)  Yes with minor changes: 57 (20%)  No: 33 (12%)</p>	
<b>Summary of free-write questionnaire comments received</b>	
<p>As shown above there was a high level of support for the policy. Outlined below are the changes respondents wished to see or the reasoning for not supporting the policy.</p>	
<p>1) <u>Higher affordable housing targets</u>: An important objective of the core strategy is the delivery of affordable housing, Herefordshire Council needs to meet the housing options of the whole County, including the delivery of open market properties. Increasing the affordable housing thresholds to increase the volume of delivery could be counter productive as it might result in residential schemes being economically unviable. This would result in no new housing coming forward. This was a common objection to Option 3 of Affordable Housing. The viability of affordable housing delivery is examined within the LDF Viability Study.</p>	
<p>2) <u>Increase need in smaller 1 / 2 bed units</u>: The Local Housing Market Area Assessment is currently being undertaken to identify need and future requirements. In general, Government guidance advocates Local Planning Authorities should provide a broad mix over large sites. This will include the delivery of smaller units.</p>	
<p>3) <u>Preferred policy direction does not cater sufficiently for the elderly</u>: The policy specifically refers to meeting the needs for the elderly population as it is acknowledged that Herefordshire Council has a higher than average percentage of older residents. The LHMA will examine the impacts of this and the future housing requirements. Specific developments to accommodate the elderly, e.g. Extra Care, will be examined within the HAP and MTRAP. Furthermore, a number of responses highlighted that care for the elderly should be included within the policy. This is being examined within the preferred policy direction of the health policy.</p>	
<p>4) <u>Housing growth is too large and should be controlled through supply and demand</u>: The housing number is a prescribed figure from regional government based on changes in demographics and forecasting. Solely relying on market forces to provide accommodation would result in unsustainable development as the needs of the entire community might not be met, e.g. affordable housing provision.</p>	
<p>5) <u>Promote cohousing</u>: While acknowledged that cohousing can create sustainable communities, the core strategy will not specifically refer to such forms of development. Cohousing can be a costly and time consuming exercise to introduce. If policy on housing types specifically referred to such forms of development, there would be no certainty that they would be delivered within the plan period. This would lead to housing need not being met.</p>	

**Summary of responses from Stakeholders**

Town and Parish Councils: Of the responses received only 3 Parish or Town Councils did not support the preferred policy direction. The reasoning for this was there was already high levels of affordable housing in the locality. Site specific issues will be examined within the MTRAP. Rural affordable housing is delivered based on need surveys and this dictates the level of development. A number of town and parish councils supported the policy seeking more affordable housing.

Sport England: Supports the policy direction

CPRE: Supports the policy direction

Natural England: Supports the policy direction

**Any new issues to be considered in the HAP or MTRAP:**

Need for affordable housing in rural areas, especially for agricultural and forestry workers.

**Any new options to be considered before Submission?**

**Any new evidence required?**

Local housing market assessment - currently being undertaken.

<b>Question:</b> Gypsies and Travellers, do you agree with the general policy?	<b>Qu: Nu:</b> 48 a) b)
<p><b>Summary of Questionnaire Responses (from associated report)</b></p> <p>Total number of responses: 257  Yes: 161 (63%)  Yes minor changes: 40 (16%)  No: 56 (22%)</p>	
<p><b>Summary of free-write questionnaire comments received</b></p> <p>As noted above, a high percentage agreed with the preferred options policy towards Gypsy and Travellers accommodation.</p> <p>Of the negative responses received or those seeking minor changes, a number of clear categories were identified.</p> <p>1) No need for increase in pitches, particularly due to under-occupancy of existing sites. The GTAA (2008) provides quantifiable evidence as to the need. Furthermore the report outlines current short-comings of existing sites. In particular existing sites were poorly designed and contained insufficient facilities to meet the needs of the community.</p> <p>2) Further development of Gypsy and Traveller sites would have detrimental impacts upon the landscape. The criteria policy to be included in the Core Strategy will contain specific wording to mitigate visual impact and promote high standards of design of developments.</p> <p>3) There is a need for the sites to be within easy access of facilities and services. The criteria policy to be included in the Core Strategy will contain specific wording regarding accessibility of developments.</p> <p>4) A number of respondents are seeking the identification of sites within the Core Strategy. The site identification will be undertaken within the subsequent DPDs. The reasoning for this is that the constraints and capacity of sites needs to be evaluated prior to being adopted. The criteria within the Core Strategy will be sufficient to meet demand and site development prior to the adoption of site specific policies.</p> <p>5) Sites should not be within built-up City and Town limits. As outlined above, specific sites will be examined within the subsequent DPDs.</p>	
<p><b>Summary of responses from Stakeholders</b></p> <p><u>CPRE:</u> Supports the preferred option</p> <p><u>Sport England:</u> Supports the preferred option</p> <p><u>Natural England:</u> Supports the preferred option subject to the sites protectings biodiversity</p> <p><u>WMRA:</u> A definitive answer is not provided but would wish to see sites identified in the core strategy as well as outlining the procedure post 2017.</p> <p><u>Hereford Travellers Support:</u> Does not support the preferred options as it fails to meet the existing under provision. Furthermore the policy needs to be simplified to ensure it fullys aids members of this community. Simplification of the policy could lead to development in protected areas and detrimental impacts upon the wider landscape.</p>	

Parish / Town Councils: Almost twice the respondents were in favour of the preferred options. Of the changes proposed by the respondents, a number of clear categories could be identified.

- 1) Tolerated sites should not be authorised and traditional planning restrictions applied. Tolerated sites would only be accepted where the authorisation would be in accordance with other policy. Furthermore, strict criteria applicable to all forms of development will be introduced within the Core Strategy Policy.
- 2) Detrimental social impacts caused by Gypsy and Traveller communities. The promotion of well designed sites in close access to existing facilities is aimed at enhancing a sense of belonging and fostering a greater community spirit. This in turn is designed to improve social cohesion.
- 3) There is no need as sites are currently under-occupied. Please comments above.

**Any new issues to be considered in the HAP or MTRAP:**

Although not a new issue, both documents will need to clearly define specific sites suitable for Gypsy and Traveller accommodation. This will remove ambiguity and allow for effective monitoring and enforcement.

**Any new options to be considered before Submission?**

**Any new evidence required?**

<b>Question:</b> Open Space, Sport and Recreation	<b>No:</b> 49a
---	----------------

**Summary of Questionnaire responses (from associated report)**

Majority of respondents agreed with the policy direction

Total responses: 279  
 Yes: 225 (81%)  
 Yes with minor changes: 41 (15%)  
 No: 13 (5%)

**Summary of free-write questionnaire comments received**

Retain Ledbury Cricket Pitch  
 Vital that we preserve open spaces for recreational use  
 Need to better maintain our football pitches  
 Address the shortage of publicly accessible sports pitches  
 Need more open spaces  
 Encourage walking in the countryside  
 Sports facilities should be built/provided in relation to demand  
 Use of school facilities should be considered to make better use of existing resources  
 Recognise the importance of accessible natural space such as woodland  
 More emphasis on diversity in open space planning to include woodlands and wildlife meadows  
 More emphasis on AONBs  
 Need to set local, not countywide standards for open space provision

**Summary of responses from Stakeholders**

**Natural England:** The area specific standards to be addressed in other DPDs should draw upon the Council's PPG17 Study and Green Infrastructure Strategy. Recommended that new development meets the Accessible Natural Greenspace Standards, which is recognised in the companion guide to PPG17. This will ensure that people living in urban areas are able to access at least 2 hectares of natural greenspace within 5 minutes on foot.

**English Heritage:** Unclear on how this policy will relate to that on green infrastructure, as there is a considerable overlap in terms of open space creation and management. Greater clarity on the policy's implementation would be required.

**Malvern Hills AONB Partnership:** More information required on specific sites.

**Sport England:** Protection should only be given to sports facilities if it is proven that they are either currently required or will be required in the future. Up-to-date playing pitch strategy would be required.

**National Trust:** Disappointed that that the policy direction does not mention quality or qualities of open space an their ability to serve multiple functions, such as nature conservation and play. Allotment provision could be addressed in this policy.

**Any new issues to be considered in HAP or MTRAP:**

New leisure centre for Ross-on-Wye  
Allocation of sites for food production (allotments)

**Any new options to be considered before Submission?**

**Any new evidence required?**

Sports Facilities Framework (Nortoft, 2010)  
Playing Pitch Strategy (Herefordshire Council, 2011)  
Various Town and Parish Plans and Village Design Statements

<b>Question:</b> Green infrastructure, do you agree with the general policy?	<b>Qu: Nu:</b> 50 a) b)
<b>Summary of Questionnaire Responses (from associated report)</b>	
<p>Total number of responses: 277  Yes: 226 (82%)  Yes with minor changes: 35 (13%)  No: 16 (6%)</p>	
<b>Summary of free-write questionnaire comments received</b>	
<p>As shown above, there is a high level of support for the preferred options strategy. Of those not in agreement with the preferred strategy or seeking a minor alteration, a number of responses can be categorised together.</p>	
<p>1) <u>Scale of proposed development is too great for the Green Infrastructure policy to have a positive impact:</u> Through the use of green infrastructure, design and local distinctiveness policies, the impact of the proposed development can be mitigated. Furthermore developer contributions will be sought to contribute to environmental improvements where appropriate.</p>	
<p>2) <u>Designate more AONBs to halt development:</u> The designation of AONBs is the responsibility of Natural England under the Countryside and Rights of Way Act 2000. Specific local designations can be done within subsequent DPDs. This is also applicable to those seeking greater priority to landscape protection. It has been noted that there was an omission on Appendix 5 and the Wye Valley AONB should be highlighted. The policies impacting AONB development will be outlined in the Core Strategy and covered in detail in subsequent DPD.</p>	
<p>3) <u>Employment and Economic development should be prioritised ahead of environmental policy:</u> While it is accepted that there is a need for economic development within Herefordshire, in order to achieve a long-term sustainable community, environmental aspects need to be considered in conjunction with all other policies.</p>	
<p>4) <u>Greater reference to Public Rights of Way:</u> It is noted that the PRoW in Herefordshire are extensive and provide an important aspect to green travel and recreation alongside wildlife and habitat protection. The core strategy will seek to protect and enhance these designations.</p>	
<p>5) <u>Prioritise renewable energy, biodiversity and green infrastructure:</u> The importance of environmental considerations in supporting sustainable development is a key theme of the core strategy. However, contributions for this will be sought on appropriate development dependent upon its scale and potential environmental impacts.</p>	
<p>6) <u>Need to justify green infrastructure contributions:</u> A number of aspects relating to green infrastructure are outlined within the community needs table of the Rural Settlement Hierarchy. Furthermore the importance of green infrastructure is outlined in Government draft PPS, such as its ability to mitigate climate change and provide recreation space for the community.</p>	

## Summary of responses from Stakeholders

Parish and Town Councils: Of the responses received, only two did not support the preferred option based on the thought that the policy would fail to make a significant impact. The importance of Green Infrastructure has increased in recent years and features heavily the Government's draft PPS - Planning for a Natural and Healthy Environment. Not only will delivering new and improving existing Green Infrastructure be beneficial to biodiversity and wildlife but also beneficial to society by providing new recreation and green transport routes.

English Heritage: Supports the preferred option subject to minor alterations. English Heritage wish the policy to make greater links with the historic environment. It is noted that the historic environment can make positive contributions to green infrastructure but site specific designations are to be within the subsequent DPDs. Further internal and external consultation with historic environment professionals will be undertaken. However, in order to secure long-term sustainability objectives, the green infrastructure policy (linked with the historic environment) cannot be unduly restrictive that the required development cannot take place.

Natural England: Supports the preferred option. Natural England wish to provide assistance in bringing this policy forward and emphasising the links on local distinctiveness, design and open space. Furthermore, they wish reference to be made to Natural England's Green Infrastructure guidance. The overall policy will outline the positive contributions the green infrastructure policy alongside design and local distinctiveness can deliver. However, it is difficult to refer to specific guidance within the policy document as objectives and documents may change during the plan period.

Woodland Trust: Does not support the preferred option. Wish to see specific reference to biodiversity and woodland protection as not all habitats are covered by statutory designations. The protection and enhancement of existing landscapes / land uses is covered under the local distinctiveness policy. Site specific designations will be analysed and covered within subsequent site specific DPDs while an overarching strategy of habitat and biodiversity protection will be contained within the Core Strategy.

WMRA: No definitive answer provided however they acknowledge that the policy is in accordance with RSS green infrastructure principles.

CLA: No definitive answer provided however they seek the retention and development of sports pitches and green facilities. Site specific development of sports facilities will be contained within subsequent DPDs. However, any policy potentially developing upon sports facilities will require a replacement to be developed elsewhere.

Malvern Hills AONB: No definitive answer provided however they support the general approach and the positive impact to reduce reliance on private motorised transport. Green infrastructure can provide alternative access to the Countryside and also develop new, more accessible recreational facilities.

CPRE: Supports the policy subject to minor changes. They support the positive impact the policy can deliver in urban / suburban areas. However, CPRE do not agree with the need of strategic corridors in rural areas as it is unnecessary. However, the development of strategic corridors is designed to reduce environmental stress and to protect and enhance movement corridors for both wildlife and communities to access

Herefordshire Environment Partnership and Herefordshire Nature Trust: Both support the preferred option subject to minor alterations. They wish to see greater detail within the core strategy in order that the required green infrastructure can be delivered in line with the proposed development locations and phases. The location and phasing of development will be covered within the HAP and MTRAP. The core strategy will outline the level of developer contributions required, however specific requirements will be within subsequent DPDs.

National Trust: Supports the preferred options

Sport England: Supports the preferred options

**Any new issues to be considered in the HAP or MTRAP:**

Review specific needs of the rural areas regarding non-statutory protected land. However, at this stage, the Local Distinctiveness policy within the core strategy will outline that such landscapes that positively contribute to local character, habitats and biodiversity must be conserved and enhanced.

**Any new options to be considered before Submission?**

Need to include Wye Valley AONB on diagrams referring to green infrastructure. Detail on what scale of development must contribute towards providing green infrastructure.

**Any new evidence required?**

<b>Question:</b> Health, do you agree with the policy direction? Please explain any changes or things you do not agree with	<b>Qu: Nu:</b> 51 a) b)
<b>Summary of Questionnaire Responses (from associated report)</b>  Total number of responses: 271 Yes: 210 (77%) Yes with minor changes: 45 (17%) No: 16 (6%)	
<b>Summary of free-write questionnaire comments received</b>  As outlined above, there was a high level of support for the preferred policy option. The reasons for seeking a minor alteration or disagreeing with the policy direction are outlined below, however, not every reason is covered as a number were outside the scope of the LDF such as parking fees.  1) Greater reference needs to be made to the elderly. The Place Shaping Paper acknowledges that there is a higher than average level of elderly residents living in Herefordshire. Furthermore average life expectancy is increasing. As a result increase pressure will be experienced on the healthcare services. The requirements of specific facilities, such as further Extra Care developments, will be examined in the subsequent DPDs.  2) Healthcare improvements are required prior to housing development. The proposed level of housing within the Place Shaping Paper is to be phased over the plan period. As a result the incremental increases in need for healthcare services can be met accordingly over a programmed level of development that meets the phases. The specific needs will be examined within the Hereford Area Plan and Market Towns and Rural Areas Plan. Furthermore, the development of healthcare facilities will be part funded through developer contributions from appropriate developments.  3) Development needs to be dispersed amongst the larger rural settlements and not just the Market Towns and Hereford. This contradicts a fewer number of responses who thought centralising healthcare was the greater option. The preferred option is seeking to deliver the necessary developments to the whole County, however, not all settlements will be appropriate locations for such development, for example, because of poor accessibility.  4) The preferred policy focuses to greatly on new services and facilities and does not give significant importance to green infrastructure, open space and local distinctiveness policy. It is noted in the policy the importance of other strategies to delivering recreational activities and contributing to a healthier society, whether this be through developing new sports pitches or preserving existing woodland character.	

## Summary of responses from Stakeholders

Town and Parish Councils: Only 2 of the responses did not agree with preferred policy with a further 4 requesting minor alterations. The main issues relating to planning are outlined below:

- 1) Health facilities need to be dispersed but only in areas with good public transport. The preferred option is seeking to support healthcare developments in Hereford, the Market Towns and Rural Areas. The policies for healthcare development will be outlined in the subsequent DPDs but accessibility will be a key issue as it positively contributes to sustainable development.
- 2) RSCs and Hubs need to have medical / healthcare facilities. The designation of such places was calculated on day-to-day services which did not include medical facilities. Notwithstanding this a proportion of designated settlements contain medical facilities e.g. GP but also have good public transport networks to the wider regions of Herefordshire such as Hereford City or the Market Towns.
- 3) Too large an increase in population. The proposed development is similar to building rates over the last decade with the exception that slightly increased levels are expected in Hereford and slightly reduced levels in rural areas. Furthermore the required development to accommodate the population increase will contribute to community needs such as health improvements.
- 4) Greater reference to the elderly community - see above

Sport England: Supports the preferred options

CPRE: Supports the preferred options

West Midlands Regional Assembly: Provides no definitive answer but does state that the preferred option is in general accordance with the RSS.

English Heritage: Supports the preferred options especially linking health to green infrastructure and its use for health and recreational purposes.

Natural England: Supports the preferred options

### **Any new issues to be considered in the HAP or MTRAP:**

Examination of existing service provision and anticipated future needs to meet the likely increase in demand. Partnership working with health stakeholders to aid identifying need. Not all facilities may be suitable for expansion and as such potential new sites / criteria to which development will be assessed, need to be set out.

### **Any new options to be considered before Submission?**

### **Any new evidence required?**

<b>Question:</b> Do you agree with the implementation and monitoring strategy	<b>Qu: Nu:</b> Q52
<b>Summary of Questionnaire Responses (from associated report)</b>  Total responses: 234 Yes: 180 (77%) Yes with minor amendments: 29 (12%) No: 25 (11%)	
<b>Summary of free-write questionnaire comments received</b>  As outlined above, there was a very high level of support for the preferred options contained within the Place Shaping Paper. However, a number of key themes were noted from those seeking minor changes.  1) A high level of funding and accurate timetabling will be required to implement the proposals: The planning department are working as part of a Local Strategic Partnership to provide co-ordinate the implementation through sharing of ideas and resource. The LDS will also be able to prioritise the implementation to the areas of greatest need and outline strict timetabling. Monitoring is a statutory requirement with the Annual Monitoring Reports that form part of the LDF. The LDS sets out the proposed timeframes of the work but unexpected changes, new information and options can require detailed analysis that may lead to slippage.  2) Keep the public informed on the progress of the plan and on how developments meet the plan's objectives. The Annual Monitoring Report and Local Development Scheme will outline the progress of the plan and once adopted planning application decision notes, which are available online or at information centres, will state the reasons why permission was granted or refused.  3) Targets need to be measurable and should specifically measure affordable housing delivery and greenhouse gas emissions. Targets will be specific, measurable, achievable, realistic, timetabled. Affordable housing is currently and will continue to be monitored. Greenhouse gas emission is an international objective which the core strategy can not effectively monitor. Planning policies are designed to limit their emissions and contribute to sustainable development. The Council can and does monitor its own emissions, however, this is not part of the core strategy.	

4) Planning enforcement is not capable in enforcing planning conditions and decisions and the proposed level of growth will let this continue, further decreasing resident's quality of life. Herefordshire Council has a very high success rate in tackling on average over 1000 cases per year. Furthermore in a number of cases the breach of planning control is subject to an expediency report analysing whether the breach is contrary to planning policy and whether there is sufficient need to halt the breach. In cases where the breach is insignificant or the changes would be considered minor amendments then enforcement action is not necessary.

5) The implementation plan cannot be supported as the respondent does not agree with the level of growth. The level of growth is based on evidence that was subject to public examination and is designed to meet the needs of the entire county. Herefordshire Council supported this principle of growth in a decision November 2009.

6) No definitive proposals within the document and therefore the implementation and monitoring section is redundant. The document is seeking to identify the direction and content of future policies. It is imperative that the core strategy contains an implementation and monitoring plan and residents views on what should be contained and how the information could be captured in valuable in shaping future policy.

7) Need to outline which bodies are involved in the plan process. Simply all members of the community can be involved in the document and the Council will undertake future consultation events and questionnaires to gauge opinion.

### **Summary of responses from Stakeholders**

Natural England: Support the policy direction and would look to assist with the development of indicators to assess performance of environmental sustainability.

Government Office for the West Midlands: No definitive answer is provided but GOWN recommend that the scale, nature, phasing, viability, costs of infrastructure be established and contingencies examined. These suggestions will be taken forward in the Infrastructure Delivery Plan.

Town and Parish Councils: Of the responses received there was an even split between support and disagreement with the policy. The reasons for disagreeing with the proposed direction of policy are outlined in the above free-write responses.

English Heritage: Support the policy direction. With regard to implementation, English Heritage wish to see a robust appraisal of the impacts of development upon heritage assets. For the monitoring English Heritage wish Herefordshire Council to adopt an innovative approach including the adoption of a Historic Environment SPD. The Council welcome the comments submitted by English Heritage and are proposing a Design Code SPD which will examine locally distinctive assets including heritage assets.

Sport England: Support the policy direction and recommend Active People and Active Places being used in the implementation and monitoring strategy. Comments welcomed and Herefordshire Council will liaise with Sport England on this matter.

**Any new issues to be considered in the HAP or MTRAP:**

**Any new options to be considered before Submission?**

Clearly outlining what is expected from development proposals and the role Herefordshire Council will play. Also must refer to how all members of the community will be involved in the decision making process

**Any new evidence required?**