

AGENDA

Cabinet

Date: **Thursday 15 October 2015**

Time: **2.00 pm**

Place: **Council Chamber, The Shire Hall, St Peter's Square,
Hereford, HR1 2HX**

Notes: Please note the **time, date** and **venue** of the meeting.

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Agenda for the Meeting of the Cabinet

Chairman
Vice-Chairman

Councillor AW Johnson
Councillor PM Morgan

Councillor H Bramer
Councillor JG Lester
Councillor GJ Powell
Councillor PD Price
Councillor P Rone

AGENDA**PUBLIC INFORMATION FIRE INFO OCT 14****HEREFORDSHIRE COUNCIL**

Notice has been served in accordance with Part 3, Section 9 (Publicity in connection with key decisions) of The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012.

Item No	Title	Portfolio Responsibility	Scrutiny Committee	28 Day Notice Given
4	Adoption of the Herefordshire local plan - core strategy 2011-2031	Infrastructure	General	17 September 2015
6	Adult and community learning plan 2015-2018	Young People, Children's and Wellbeing	General	28 August 2015
7	Planned capital programme for schools 2015/16	Young People, Children's and Wellbeing	General	5 August 2015

1. APOLOGIES FOR ABSENCE

To receive any apologies for absence.

2. DECLARATIONS OF INTEREST

To receive any declarations of interest by Members in respect of items on the Agenda.

3. MINUTES

To approve and sign the minutes of the meeting held on 11 September 2015.

4. ADOPTION OF THE HEREFORDSHIRE LOCAL PLAN - CORE STRATEGY 2011-2031

To recommend to Council that the Herefordshire local plan core strategy 2011-2031 ("the core strategy") be adopted.

5. LOCAL ACCOUNT 2014/15

To approve publication of the Local Account of Adult Social Care and Support 2014/15

6. ADULT AND COMMUNITY LEARNING PLAN 2015-18

To approve the adult and community learning plan 2015/18

7. PLANNED CAPITAL PROGRAMME FOR SCHOOLS 2015/16

To approve the proposed expenditure of capital grants for school building and maintenance work allocated to the council for the year 2015/16

8. FUTURE DELIVERY ARRANGEMENTS FOR WEST MERCIA YOUTH OFFENDING SERVICE (WMYOS)

Pages

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To secure approval for proposed new delivery arrangements for West Mercia Youth Offending Service (WMYOS).

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HEREFORDSHIRE COUNCIL

MINUTES of the meeting of Cabinet held at Shire Hall, St Peter's Square, Hereford, HR1 2HX on Friday 11 September 2015 at 2.00 pm

Present: Councillor AW Johnson (Chairman)
Councillor PM Morgan (Vice Chairman)

Councillors: H Bramer, JG Lester, GJ Powell, PD Price and P Rone

In attendance: Councillors JM Bartlett, WLS Bowen, JA Hyde, RI Matthews, AJW Powers, Mr A Neill, Mrs J Davidson, G Hughes, Robinson, Samuels, EPJ Harvey, D Summers and EJ Swinglehurst

Officers: Mr A Neill, Mrs A Brookes, Mrs J Davidson, Mr G Hughes, Mr P Robinson, Mr M Samuels

91. APOLOGIES FOR ABSENCE

Apologies were received from Councillor TM James.

92. DECLARATIONS OF INTEREST

There were no declarations of interest.

93. MINUTES

RESOLVED:

That subject to Councillor FM Norman being recorded as “in attendance” rather than as a Cabinet Member, the Minutes of the meeting held on 23 July 2015 be approved as a correct record and signed by the Chairman.

The Leader welcomed the new director for Adults and Wellbeing, Martin Samuels.

It was agreed that the health and safety policy (agenda item 94), would be moved to the last item on the agenda for today’s meeting.

94. YOUTH JUSTICE PLAN

The Youth Justice Plan was presented by West Mercia Youth Offending Service (YOS). This was an annual plan determined by the Youth Justice Board, and which linked to other plans in the county. The plan reported positively for last year and the current year, with 11% fewer young people entering the system and a reduction in youth custody.

The plan used a national tool which measured performance in real time, month by month and there was closer integration in Herefordshire with regard to Families First and looked after children and links to the Children and Young People’s Plan. There was a clear plan for further progress in 2015/16.

In answer to a query from the Cabinet Member for Economy and Corporate Services regarding a review of the YOS, it was clarified that the review has led to a recommendation that the Police and Crime Commissioner hosts the service. In his role as chair of the Community Safety Partnership, the Member also asked if issues

regarding tracking of data were resolved. It was confirmed that data was now being tracked monthly. Further clarification showed that with regard to a reduction in the numbers of young people reoffending, whilst the cohort was smaller, there were more young people with complex needs who were at greater risk, although reoffending rates were reducing. It was confirmed that regional figures were provided in the plan so that a profile for the county could be seen.

It was also noted that the report contained abbreviations which had dual meaning, such as FTE meaning both full time equivalent and first time entrants.

The group leader of Herefordshire Independents welcomed the reduction in figures and asked about the 37% of children who are in care. It was explained that looked after children have more complex needs and mechanisms were in place to gather feedback from these children about how the service could be improved. It was noted that children and young people who engaged with the YOS were less likely to offend; however, more was being done to improve this service as offending was still occurring.

The group leader of It's Our County welcomed improvements in the service but observed that the county had the highest first time entrant (FTE) figure in the region only partly due to the detection rate. He noted that Herefordshire was a demographically smaller partner but had the highest statistic on FTEs and sought assurance that there were sufficient resources to reduce FTEs. It was clarified that the county did have a higher detection rate and that there was comparatively less use of community resolution and therefore the FTE rate was higher than in other areas.

The service was consulting with young people about provision and there was good progress and use of resources despite a further in-year reduction in resources.

The director for children's wellbeing explained that there was a relatively higher proportion of looked after children entering the county due to the availability of accommodation. Since residential children's homes tended to have higher callout rates to police, there was more work required on restorative justice and direct work with homes. She added that it was the responsibility of corporate parents to decide whether to criminalise a looked after child and this was a particular issue for Herefordshire. As regards resources, there was recent consultation on a 6% in-year reduction to the grant from the Youth Justice Board to the YOS; it was not considered that this would adversely affect a continued downward trend in figures.

In answer to a question from the Green group leader regarding the service's effectiveness at preventing reoffending, it was clarified that each person was assessed with regard to either transition into probation or retention in the YOS and there was a member of staff looking at new ways of working.

The leader of the Green group made a further observation regarding satisfaction levels in service provision for those involved in drug use and those experiencing upsetting thoughts, which meant that one person in four was not getting the right help. It was confirmed that the YOS was engaged in the new contract for drug and alcohol services.

RESOLVED

That the Youth Justice Plan be recommended to Council for approval.

95. CHILDREN AND YOUNG PEOPLE'S PLAN

The Children and Young People's Plan was introduced by the Cabinet Member for Young People and Children's Wellbeing. The plan provided a clear vision for

Herefordshire to ensure that young people had the best start to life. It also minimised the impact on services as people grow older, therefore good for the county as a whole, and reminded councillors of their responsibilities as corporate parents. A child friendly version was being developed. Acknowledgement was given to all who developed the plan.

The assistant director, education and commissioning, explained the plan's key points:

- relationship to the health and wellbeing strategy and specific targets, recognising the work with partners to identify priorities including resources and savings;
- working with troubled families, with a focus on early help and targeting direct services and supporting 600 families which would-draw in finance;
- targets to reduce first time entrants (FTEs) and reoffending;
- improving performance in such issues as breast-feeding, immunisations, health visitors and school nurses;
- mental health linked to adults' services to redesign services;
- improving safeguarding and recognising pressures on placements;
- focus on adolescent services and those not in employment, education or training (NEETs) and their contribution to the economy;
- recognition of recent legislation regarding changing care plans to develop single pathways for disabled children moving into adulthood.

In response to a comment from the group leader for Herefordshire Independents regarding risk management and the statistics provided regarding mental health, it was confirmed that the plan was intended to be clear about responsibilities and resources and the partnership provided a vehicle to identify risks. I

It was recognised that people needed access to the right mental health support at both at national and local level and that developments in mental health services needed to be seen as it was expected that the number of people identified with mental health issues would grow. It was also recognised that emotional health needs could be addressed as a wider issue on the basis that supporting those needs in earlier years made people more resilient as adults.

The chair of the general overview and scrutiny committee commented on the plan's reference to safeguarding and questioned the level progress made in this area, for example with the Multi-agency Safeguarding Hub (MASH). The director for children's wellbeing clarified that they key issue was to retain focus on safeguarding and practice improvements and to develop the MASH further to cover all age-groups with further input from police and other partners.

In response to a further question regarding children coming into the county, it was explained that the issue of advance notification had improved and better arrangements were in place, although there remained issues where children were placed in an emergency and so systems had to catch up with their situation.

The leader of It's Our County (IOC) welcomed the preventive approach and asked how the plan linked to the public health agenda and budget. It was confirmed that the plan was produced with input from the public health team and that there was a member of that team focused on children and families.

In answer to his further question regarding the development of healthy child services and the family nurse partnership, it was clarified that service developments would allow for better local planning within the national framework.

The Cabinet Member for young people and children's wellbeing acknowledged a further comment from the IOC group leader regarding community engagement and the potential

role of parish councils and the third sector. He commented that, in order to avoid duplication, it was important to recognise that the plan belonged to the county rather than the council. He added that parish and town councils played an important role in ensuring services were provided.

The leader of the Green group asked about financial implications associated with funding the work with troubled families. In response, reference was made to the outcome that partners were to identify 600 families and that work with them would continue and as there was no reliance on funding, there was no associated risk. The approach taken centred on multi-agency work with families with particular problems such as offending and truancy. There was a new scheme to fund volunteers to work with families in order to draw communities in and identify areas where communities can help and this was seen as a sustainable way of meeting high level and infinite needs against finite funds.

The chair of the health and social care overview and scrutiny committee observed that the plan referred to free school meals provision being linked to a child's development, although it is now the case that meals are provided to all children. It was clarified that this criterion still existed for the purposes of data collation.

RESOLVED

That the children's and young people's plan be recommended to Council for approval.

96. CAPITAL SUPPORT FOR THE FEDERATION OF AYLESTONE BUSINESS AND ENTERPRISE COLLEGE (ABEC), BROADLANDS PRIMARY SCHOOL AND CHILDREN'S CENTRE

The assistant director, education and commissioning, presented the report and reminded cabinet of an earlier report that was presented on 13 November 2014. The report related to two separate schools and early years provision which faced significant capital spend requirements and surplus places if they remained in situ. The scheme moves provision to one site with revised costs. This would provide high quality provision and a new primary school, and represented a forerunner for other projects in the school capital investment strategy.

The chair of the general overview and scrutiny committee commented on apparent mismeasurement and miscalculation connected with the scheme and asked for explanation. The head of educational development explained that the projected costs were investigated and were greater once more detailed work took place on the scheme, although it still represented best value for the council.

The Cabinet Member for young people and children's wellbeing emphasised the importance of moving forward with the scheme to consolidate assets, and pointed out the significantly higher cost of building from new. It was important to now look at what had been achieved with the scheme and how this would influence how future projects would develop within the strategy.

The chair of the general overview and scrutiny committee commended the report.

The group leader of It's Our County (IOC) expressed concern regarding the process followed for getting the scheme to this stage and that contract design and management of this scheme highlighted the value in doing this well.

The Leader commented on the need to ensure all facts and best deals were gathered and there were other previous contracts which highlighted this.

The Cabinet member for economy and corporate services commented on the process followed for developing this scheme given the limited capital funds for schools.

The group leader of Herefordshire Independents welcomed the scheme and observed that it created an environment which supported children to make an easier transition from primary to secondary education. In answer to his enquiry regarding the future of the vacated site, it was clarified that it would be included in capital estates.

Commenting on the identification of risk, the director for children's wellbeing reminded cabinet of the element of risk associated with large scale projects, which had been identified and reported at the outset and of the benefits and outcomes that this scheme would bring for schools and for children.

The Leader commented on the value of learning from all schemes.

RESOLVED

That

- (a) the impact of the reduced estimated value of the land which will reduce the anticipated contribution to corporate resources, as set out at paragraph 9 of the report be noted; and**
- (b) it be recommended to Council that an additional £250k of funding be approved to relocate Broadlands primary school onto the Aylestone Business and Enterprise College (ABEC) site.**

97. HEALTH AND SAFETY POLICY

The Cabinet member for economy and corporate services introduced the health and safety policy and strategy which was a statutory requirement and had been refreshed and updated. The management structure and lines of responsibility had been updated and included in the corporate risk register.

It was noted that from January to April 2015, incidents under the Reporting of injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) had reduced by 50%.

Cabinet members were asked to note that the health and safety management board included three council members and views were sought on membership to be forwarded to the cabinet member for economy and corporate services.

RESOLVED

That the updated health and safety policy and strategy for its implementation be approved.

There followed a short statement before the close of the meeting from the Cabinet member for economy and corporate to announce that in interest of public and staff safety it was decided to temporarily close Hereford library and museum with effect from today.

Questions on this matter would be dealt with following the close of the Cabinet meeting.

The meeting ended at 3.17 pm

CHAIRMAN



Meeting:	Cabinet
Meeting date:	15 October 2015
Title of report:	Adoption of the Herefordshire local plan - core strategy 2011-2031
Report by:	Assistant director – economic, environment & cultural services

Classification

Open

Key Decision

This is a key decision because it is likely to be significant in terms of its effect on communities living or working in an area comprising one or more wards in the county.

Notice has been served in accordance with Part 3, Section 10 (General Exception) of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) Regulations 2012.

Wards Affected

Countywide

Purpose

To recommend to Council that the Herefordshire local plan core strategy 2011-2031 (“the core strategy”) be adopted.

Recommendation(s)

THAT:

- (a) the local plan inspector’s report (at appendix1) be noted;
- (b) the Herefordshire local plan core strategy 2011-2031 (at <https://www.herefordshire.gov.uk/planning-and-building-control/planning-policy/core-strategy>), incorporating the recommended main modifications (at appendix 2) and the schedules of minor modifications (at appendix 3) be recommended to Council for adoption; and

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 Andrew Ashcroft, assistant director – economic, environment & cultural services on
 Tel (01432) 383098

- (c) **it be recommended to Council that delegated authority be given to the programme director growth to make any further minor modifications, (e.g. typographical) to ensure consistency with other development plan documentation**

Alternative options

- 1 There is an alternative option not to recommend to council to adopt the core strategy. However there would be little if any merit in doing so given that the inspector has concluded that it is sound and that there have been no relevant changes in the county. Not adopting the core strategy would result in the council having to rely on the current policies in the Unitary Development Plan (2007) (UDP), and the National Planning Policy Framework (NPPF) in deciding planning applications. In this case, the general policy of the NPPF, that planning permission should be granted if relevant policies are out-of-date, would apply. In addition, there would also be little, if any, improvement in the council's five year land supply and, without the core strategy in place, the council would be unable to provide certainty for investors, co-ordinate the delivery of infrastructure, and would be hampered in efforts to seek funding to support infrastructure and growth. This would harm the council's ability to deliver on its strategic objectives by delaying the delivery of new homes, holding back economic growth, and stalling regeneration.
- 2 In addition, given the requirements for consultation and examination which would need to be met to progress any amended core strategy, there would be considerable delay before the risks outlined in paragraph 1 above could be mitigated.
- 3 Cabinet could decide to defer this decision or recommend to council that the decision be deferred but this is not recommended for the reasons set out above.
- 4 There is not an option to adopt the core strategy with only some of the proposed main modifications that came out of the examination process. By definition the core strategy is now considered to be sound on the basis of its full content. If the main modifications were not included the core strategy would not be sound and it could not be recommended for adoption.
- 5 The schedule of minor modifications does not affect the basis of the core strategy and as such an alternative could be to recommend adoption without the schedule of minor modifications. However as this schedule aids the clarity of the document and ensures the plan is up to date this option is not recommended.
- 6 Authority for making further minor modifications could be delegated to the relevant cabinet member or to cabinet; as the modifications covered by this delegation do not affect the basis of the core strategy, and in exercising such delegated authority the officer is required to consult with the relevant cabinet member. The proposed delegation provides the most efficient way of maintaining a clear and consistent set of development plan documentation.

Reasons for recommendations

- 7 The existing adopted unitary development plan (2007) ("UDP") is now significantly out of date and has only limited weight within the context of the National Planning Policy Framework 2012 (NPPF).

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Andrew Ashcroft, assistant director – economic, environment & cultural services on
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- 8 The preparation of the core strategy has been a long and exhaustive process and the inspector has concluded that it meets the test of soundness.

Key considerations

- 9 The core strategy (<https://www.herefordshire.gov.uk/planning-and-building-control/planning-policy/core-strategy>) has been in preparation since 2008. It has been developed in accordance with national planning policy guidance, including undergoing seven stages of consultation. Following approval by Council in July 2013, it was submitted for examination in September 2014 and detailed hearings were held on specific aspects of it in February 2015.
- 10 The core strategy covers the period from 2011–2031. It proposes a comprehensive series of proposals and allocations within the county. In doing so it balances environmental issues with economic and social needs and ensures that development will be sustainable. Whilst the examination process has refined the core strategy, its key strategic proposals set out below remain unaffected:
- Provision of a minimum of 16,500 new dwellings in the county;
 - For Hereford an overall target of 6,500 new dwellings including the proposed urban extensions at Holmer, Lower Bullingham and Three Elms;
 - Provision of a relief road to the west of Hereford;
 - Development of 148 hectares of employment land across the county including employment hubs focussed in Hereford and the market towns;
 - The development of 4,700 new homes across the county's market towns incorporating the provision of key items of infrastructure;
 - Accommodation of 5,300 new dwellings in rural areas throughout the plan period as supported by neighbourhood plans.
- 10 The inspector's report is attached at appendix 1. It was received on 29 September 2015 and published on the council's website as required. It concludes that, with the inclusion of the series of proposed main modifications (at appendix 2), the core Strategy meets the test of soundness. The inspector's main modifications include changes to some key aspects of the core strategy including:
- Removal of waste and minerals policies and the future preparation of a waste and minerals plan;
 - Introduction of a replacement policy addressing the relationship between infrastructure, delivery and monitoring;
 - Changes to wind power developments and housing standards policies to reflect recent changes in national policy;
 - Changes to reflect retail and affordable housing thresholds;
 - Changes to clarify the roles of neighbourhood plans and other development plan documents.
- 11 In addition to the main modifications there is also a series of minor modifications (at appendix 3) proposed which clarify aspects of the plan but do not change the approach of the plan's policies. Minor modifications are a matter for the council, rather than the inspector, to propose, and this is reflected in the inspector's report (paragraphs 4 and 100). Most of the minor modifications were published alongside the main modifications in March 2015. In addition, other minor modifications arose in response to comments made during the consultation upon the main modifications.

- 12 The existing UDP was adopted in 2007. The provisions in the Localism Act 2011, the NPPF and more recently the release of the Planning Practice Guidance (March 2014) make it important that an up-to-date local plan is in place as soon as possible so that the council has greater control over development. With an up-to-date plan the council will have a clear strategy for future growth within the county. As such it will not be heavily reliant on the NPPF in determining planning applications. A number of other elements of the local plan are also scheduled to be prepared to complement strategic policies of the core strategy including the Hereford area plan, the minerals and waste local plan, the travellers' development plan document and the community infrastructure levy. Following adoption of the core strategy an updated local development scheme outlining the timetable for the preparation of these documents will be produced.
- 13 As with all strategies, once adopted the local plan will be periodically reviewed to ensure it remains compliant with planning policy guidance, national legislative changes and responsive to local need.

Community impact

- 14 The principal aim of the core strategy is to set out the visions and objectives for the county and to establish a policy framework necessary to deliver the vision to 2031. This will ensure that there are sufficient homes provided for all members of the community, provide employment opportunities and growth, sufficient retail provision, improved infrastructure and the wider protection of the environment. The NPPF sets out the challenge that local planning authorities promote sustainable development. In her report it is clear that the Inspector concludes that this ambition has been achieved.

Equality duty

- 15 In order to fulfil the requirements of Section 149 of the Equality Act 2010, an equality impact assessment (at appendix 4) has been completed. The assessment confirms that there is no potential for discrimination and that all appropriate opportunities have been undertaken to advance equality and foster good relations.

Financial implications

- 16 Costs associated with adoption will involve ensuring the necessary notifications are undertaken and making the core strategy and other documents required by the local plan regulations are available for inspection. Funding for these tasks is in place in existing budgets and/or reserves.

Legal implications

- 17 Once adopted the core strategy will form part of the statutory development plan for the area and be used as such for the purpose of determining planning applications in the county. Its preparation has involved ensuring compliance with statutory procedural requirements including: duty to cooperate, sustainability appraisal and habitats regulations assessment being undertaken at key stages during the

preparation of the plan, and consultation statements summarising how the council has engaged with communities and other stakeholders during the process.

- 18 The options open to the council at this stage in the process are set out in the said 2004 Act (notably sections 23 and 27) and the Town and Country Planning (Local) (England) Regulations 2012/767 (as amended). Namely where the inspector recommends that it is adopted, as here, with modifications (“the main modifications”) the council may adopt the document (a) with the main modifications, or (b) with the main modifications and additional modifications (i.e. minor modifications) if they (taken together) do not materially affect the policies as recommended by the Inspector.
- 19 If the council rejects one or more of the inspector’s recommended modifications it cannot then proceed to adopt the core strategy. If the recommendation in this report is approved the core strategy must be formally adopted, by resolution, of full Council, and subsequently, an ‘adoption statement’ would need to be published in the local press advertising the availability of the inspector’s report and the adopted core strategy.
- 20 Adoption of the core strategy by the council will trigger a six week period from its adoption, within which any person aggrieved by the core strategy may make an application to the High Court under section 113 of the said 2004 Act on limited grounds, namely that either: (a) the document is not within the appropriate power; or (b) a procedural requirement has not been complied with. The adoption of the core strategy can only be challenged therefore on the above legal grounds and not simply because of a lack of agreement with the inspector’s recommendations.
- 21 Through the public examination process, the inspector has confirmed that the core strategy has met the legal compliance and soundness requirements.

Risk management

- 22 Any delay in adopting the core strategy will result in developers continuing to submit planning applications outside the context of an up-to-date and overarching strategy. In particular this could undermine the delivery of the strategic urban extensions proposed in the core strategy.
- 23 The adoption of the core strategy will generate the provision of a five year housing land supply. There would be a significant risk to the strategic management of development in the county if a five year supply of housing land were not in place.
- 24 If the core strategy is not agreed momentum may be lost with regards to achievement of the council’s ambitions for growth in the county.
- 25 There are no significant risks associated with adoption of the core strategy.
- 26 Conversely, there are significant risks associated with a decision not to adopt. We would not have a plan to meet our housing need. It would be very unlikely that the council could continue to maintain a five year supply of land for housing (plus buffer), as required by paragraph 47 of the NPPF. This in turn would also increase the risk of speculative applications in less favoured locations which may be difficult to resist. It would undermine the ability of the council to secure inward investment and economic growth. Without the certainty provided by an adopted core strategy we weaken our

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competitive advantage to secure the investment needed to maintain the viability of our communities. It would leave those communities wishing to prepare a neighbourhood development plan in a 'strategic policy vacuum', making it much more difficult to proceed because there are no up to date strategic policies within which to set their own vision and policies.

Consultees

- 27 During the period of preparing the core strategy there have been seven periods of consultation as follows:
- Identifying the issues, May 2007;
 - Key issues consultation, September – October 2007;
 - Developing options, June – August 2008;
 - Place shaping, January – March 2010;
 - Preferred options, July – November 2010;
 - Revised preferred option, October – November 2011;
 - Herefordshire local plan – core strategy (draft), March – April 2013.
- 28 The nature of the process has involved extensive engagement with countywide local people, interest groups and statutory agencies through the seven rounds of consultation.
- 29 The pre-submission version of the document was published in May 2014. The publication of the core strategy was advertised and those individuals and organisations that had shown interest during the preparation of the core strategy were invited to comment. In addition, there were specific periods of consultation between March and May and again in July-August 2015 on the proposed main modifications to the core strategy that were generated as a result of the examination hearings and recent changes to national planning policy.
- Details of the consultations undertaken are available at https://www.herefordshire.gov.uk/media/7923636/reg_22_statement_complete.pdf.

Appendices

Appendix 1 - Report on the examination of the Herefordshire local plan core strategy 2011-2031, 29 September 2015

Appendix 2 - Herefordshire local plan core strategy main modifications, September 2015

Appendix 3 - Herefordshire local plan core strategy minor modifications, October 2015

Appendix 4 - Equality impact assessment 2015

Background papers

None.

Further information on the subject of this report is available from
Andrew Ashcroft, assistant director – economic, environment & cultural services on
Tel (01432) 383098

Report to Herefordshire Council

by Christine Thorby MRTPI IHBC

an Inspector appointed by the Secretary of State for Communities and Local Government

Date **29 September 2015**

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION OF THE
THE HEREFORDSHIRE LOCAL PLAN
CORE STRATEGY 2011 - 2031**

Document submitted for examination on 23 September 2014

Examination hearings held between 10 February and 25 February 2015

File Ref: PINS/W1850/429/3

Abbreviations Used in this Report

AA	Appropriate Assessment
CS	Submission Core Strategy May 2014
DCLG	Department of Communities and Local Government
DPD	Development Plan Document
DtC	Duty to Co-operate
HC	Herefordshire Council
HRR	Hereford Relief Road
HMA	Housing Market Area
LDS	Local Development Scheme
MM	Main Modification
NMP	Nutrient Management Plan
NP	Neighbourhood Plan
NPPF	National Planning Policy framework
OAN	Objectively Assessed Need
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
UEA	Urban Expansion Area
SUE	Sustainable Urban Extension
WMS	Written Ministerial Statement

Non-Technical Summary

This report concludes that the Herefordshire Local Plan Core Strategy 2011- 2031 Plan provides an appropriate basis for the planning of the District, providing a number of modifications are made to the plan. Herefordshire Council has specifically requested me to recommend any modifications necessary to enable the plan to be adopted.

All of the modifications to address this were proposed by the Council but where necessary I have amended detailed wording and I have recommended their inclusion after considering the representations from other parties on these issues.

The Main Modifications can be summarised as follows:

- Removal of waste and minerals policies and associated explanatory text and add information about the preparation of a waste and minerals plan;
- Replacement policy and new appendices addressing the relationship between critical infrastructure, delivery and monitoring;
- Revised housing trajectory to provide more detail and up-to-date figures to assist with monitoring;
- Modifications to numerous policies to ensure that they are not restrictive/prescriptive or to provide clarity/flexibility;
- Changes to wind power development and housing standards policies to reflect recent written ministerial statements from the Secretary of State for Communities and Local Government;
- Changes to retail and affordable housing thresholds;
- Modifications to clarify the roles of neighbourhood plans and other development plan documents;
- Changes to numerous policies to update the wording to be consistent with national policy contained in the National Planning Policy Framework.

Introduction

1. This report contains my assessment of the Herefordshire Local Plan Core Strategy 2011- 2031 (CS) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the submitted, Herefordshire Local Plan Core Strategy 2011 – 2031, pre-submission publication May 2014 which is the same as the document published for consultation in May 2014.
3. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.
4. The Main Modifications that are necessary for soundness all relate to matters that were discussed at the Examination hearings. Following these discussions, the Council prepared a schedule of proposed main modifications and carried out sustainability appraisal where necessary and this schedule has been subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made amendments and some additions to the detailed wording of the main modifications. None of these amendments significantly alters the content of the modifications as published for consultation such that they undermine the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have highlighted these amendments in the report. Other modifications arising after the consultation on the Main Modifications are minor and are a matter for the Council.

Assessment of Soundness

5. The following is a list of background documents which accompanied the CS that are relevant to the plan as a whole.
6. The Statement of Community Involvement (SCI) [A6] was adopted by the Council in March 2007. It sets out a framework which identifies how and when the Council will consult in the preparation of future planning documents including the CS. The preparation of the CS has followed the consultation principles established in the SCI. In addition, the Statement of Consultation [A11] brings together and summarises the consultation process undertaken by the Council on the CS from 2007 up to the publication of the final publication document in September 2014.
7. Some representors expressed concern about consultation; however, the preparation of the CS has followed the consultation principles established in the SCI. There were also concerns about the submission of statements of common ground and other documents received during the hearing sessions. However, these related to matters already under consideration and the statements of common ground were very helpful as part of the on-going consideration of soundness of the plan. I am satisfied that the preparation of the CS has followed the consultation principles established in the SCI.
8. The CS has been subject to Sustainability Assessment (SA)[A4] throughout its preparation up to the time of the Hearing. In addition the Main Modifications were subject to a further Addendum SA. The Council's evidence base demonstrates that different options and alternatives have been addressed at all of the relevant stages. The SA identifies the process, including the final submission SA (and the subsequent addendum April 2015 relating to the main modifications). At each stage of its development the emerging CS policies were assessed against SA objectives, and consideration was given as to whether and how the policies would further the objectives. The SA was subject to consultation in the same way as the CS. There is nothing to suggest that the SA was undertaken other than in accordance with the Regulations. The conclusion of the SA, up to and including the Main Modifications, is that the CS is robust in terms of its sustainability. Its policies provide certainty and clarity. Taking all of the above matters together, the CS has been subject to an adequate Sustainability Appraisal.
9. Similar conclusions apply in respect of the work carried out on the Council's behalf in relation to the Habitats Regulations Assessment/Appropriate Assessment (HRA/AA) [A5] and Addendum for the Main Modifications, given that necessary amendments were made to draft stages of the plan, prior to the submission version. Taking into account the advice from relevant consultees, notably Natural England and the Environment Agency, I consider that the plan has been subject to a legally compliant and adequate HRA.
10. On 1 December 2014 an assistant Inspector, Elizabeth Ord LLB(Hons), LLM, MA, DipTUS, was appointed to examine the CS waste and minerals (MW) policies. The assistant Inspector wrote to the Council on 25 January 2015 advising them of her concerns about the MW policies and associated text. These related to a lack of evidence that strategic issues such as cross boundary movements, meeting needs and shared sites had been co-ordinated

with surrounding Councils; a lack of strategic information about targets, standards, capacity and overall scale of development in the CS; an aging evidence base which did not take account of current national policy; the lack of a clear vision, objective and spatial strategy for MW, and finally, that the strategy for the supply of minerals and the provision of waste management facilities was inadequate.

11. To remedy the numerous weaknesses of the MW section would require significant amendments to the evidence base, the MW policies and related text, and result in very different document to that which has been submitted with a considerable time delay. In order for the submission plan to be sound **MM01** is proposed, deleting the waste and minerals policies, the supporting text and any reference to the policies throughout the plan. Herefordshire Council set out updates to the LDS [IN7] which includes a timescale for the delivery of a separate Minerals and Waste Local Plan to be submitted for examination in 2016.

Assessment of Duty to Co-operate

12. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation.
13. The Council has prepared a 'Duty to Co-operate Statement' [A12] which summarises how the Council has co-operated with other Local Planning Authorities (LPAs) and with the additional bodies prescribed in Regulation 4 of the 2012 Regulations.
14. The sections on minerals and waste are brief, with limited evidence of cross boundary co-operation and I have addressed this in paragraphs 10 and 11 of my report. For the remaining policies, the Council has worked well with all the neighbouring authorities during the preparation of the CS. The level of involvement with the different authorities has varied according to the issues raised. Details of a range of meetings, discussions and other means of communication are set out in detail in DtC document [A12]. As an outcome, it is clear that there are no strategic cross boundary issues that need to be resolved. It is clear that there has been positive and constructive engagement with surrounding authorities.
15. In relation to the relevant Regulation 4 bodies, all relevant bodies have been engaged - some in more detail than others, dependant on the extent of their involvement in the Plan's infrastructure proposals. Again, details of the means of engagement are set out in document A12. The Council has engaged constructively, actively and on an on-going basis. Taking the plan as a whole, I conclude that the CS complies with the legal DtC in the Act.

Main Issues

16. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified eleven main issues upon which the soundness of the Plan depends.

Issue 1 – Whether the overall spatial strategy is soundly based and does it present a clear spatial vision for the county, appropriate to the needs of the area, consistent with national policies?

17. The spatial vision (chapter 3) seeks sustainable development based on fostering a high quality of life for those who live and work in Herefordshire whilst protecting the distinct areas of character within the county. The strategy seeks to achieve this by ensuring an appropriate balance between improving the quality of life, gaining economic prosperity for all and the protection of the county's environmental assets. At the highest level, this is a clear and appropriate vision.
18. A series of vision statements and twelve objectives support the spatial vision. They are focussed around the role of sustainable development as set out in the National Planning Policy Framework (NPPF). They put forward social, economic and environmental aims, identifying the relevant CS policies under each strand aimed to deliver a sustainable outcome for the plan. **MM04** is proposed adding a new objective relating to the importance of land based industries and agriculture to the economic prosperity of the county. This is important as it clarifies and supports the objectives of policies SS5, RA6 and E1. Policy SS1 sets out the presumption in favour of sustainable development.
19. The spatial strategy builds upon the existing settlement pattern with most new housing and employment directed towards the city of Hereford, the largest settlement in the county where many of the major services and facilities are located. Leominster, the county's second main market town, will also be the focus of large scale strategic housing development in recognition of its economic importance and good public transport links. Development in the smaller, most sustainable, market towns, reflects their roles, needs, opportunities and development constraints and will assist in meeting the aims of the plan. Herefordshire is a mainly rural county and in recognition of the dispersed settlement pattern almost a third of the all housing is directed through small scale development towards villages in rural areas. The Council's studies [C30, C31, C32] indicates that this is a reasonable approach, as it will help to sustain and develop rural services and communities, and meet identified local need. The infrastructure required to support growth throughout the county has been considered in the Infrastructure Delivery Plan [C29] and this is addressed in more detail later in this report.
20. One of the key strategic provisions of the CS is to locate new housing for Hereford and the market towns on large green field UEAs (Urban Expansion Area) and strategic sites recognising that the SHLAA and other studies [B20g, C25a and C30] show there is insufficient capacity on brownfield land to meet needs. Although large strategic sites can take some time to deliver the quantity of housing sought, this is a long term approach for the plan period, which has been carefully considered throughout preparation of the Plan, looking at the SHLAA, other options and all reasonable alternatives, and following appropriate consultation. The large scale sites offer long term co-ordinated growth, where social and transport infrastructure meeting the needs of the new residents can be delivered in a comprehensive manner. The same conclusions would not apply to a more dispersed pattern of new housing growth incorporating smaller schemes across the county. The Council has demonstrated through the SHLAA, SA and consideration of other sites put

forward following consultation of the Draft CS/preferred options stages of the plan, that the location of the strategic sites has been carefully considered over a long period of time, in line with national policy and guidance. Other sites put forward were less sustainable, were of greater landscape sensitivity, had greater infrastructure demands or were not preferred by locals, and those in the plan are, therefore, the best options for the county.

21. The impacts and the benefits of the approach have been addressed in the evidence and I am satisfied that the CS represents a reasonable and pragmatic spatial strategy for Herefordshire over the next 20 years in order to achieve the sustainable growth objectives of the plan.

Is there sufficient information in the plan to guide development and does the plan leave critical decisions to other documents?

22. Larger, strategic sites - UEAs and sustainable urban extensions (SUEs) - are identified by broad locations in the plan with no site boundary and they are not precise allocations. Whilst I was initially concerned that there was insufficient detail to identify and bring forward sites, it became clear during the examination that there was considerable owner/developer interest in the strategic sites and the Housing Land Supply position statement (March 2014) showed that many had progressed to a pre-application stage. In addition, each of the sites has a specific policy related to it, identifying the approximate quantum of the various uses, with more details to be provided, if necessary, by a masterplan. The CS policies retain a degree of flexibility whilst giving sufficient detail at this strategic stage to assist in bringing forward the key sites. As the anticipated development will come forward throughout the plan period including the middle/late period, I am satisfied that the plan gives sufficient certainty and clarity at this stage to facilitate development.
23. While the strategic sites are identified, the location of the remaining smaller scale sites for houses and employment for the market towns and rural villages will mostly be established through neighbourhood plans (NP). In this respect the Council have made good progress, and the Neighbourhood Planning Update [PS47] showed that four of the five market towns and between 65 – 75% of the rural villages identified for growth in the process of producing their own plans at the time of the hearing. The trajectory shows that some of these plans could be at the submission stage by April 2016. The CS identifies where Development Plan Documents (DPDs) will be prepared by the Council for areas not covered by NPs. **MM02** adds a necessary commitment and monitoring timescale to bring forward sites in the rural area in a Rural Area Site Allocation Development Plan Document where there is no NP forthcoming.
24. MM02 also sets out that all of the policies in the Plan are strategic in that they contribute to the strategic aims of the CS. While representors were concerned that this would reduce flexibility for NPs, I agree that each of the policies in the Plan delivers one of the strategic priorities in the NPPF. There is no evidence to demonstrate that any of the policies are unrelated to these, or that NPs would be unduly restricted in their remit. MM02 is necessary in the interests of clarity and to assist in the NP process, consistent with the aim of NPPF paragraph 16 that NPs should support the strategic development needs of the plan.

25. Overall, the spatial strategy is consistent with national policy and guidance and is based on a sound and thorough analysis of the current situation in the county, as demonstrated in the comprehensive and detailed evidence base.

Issue 2 – Whether the approach to the provision of housing is positively prepared, is appropriate to the needs of the area is soundly based and consistent, with national policy?

Objectively assessed needs for housing and the housing target

26. Herefordshire is a relatively self-contained county and there is a consensus that the county boundary broadly represents a single strategic market housing area. There is no evidence of unmet need from other local authorities and I am satisfied that evidence set out in the West Midlands Strategic Housing Market Area 2009 (SHMA), the Herefordshire Local Housing Market Assessment 2013 (HLMA) [C26] demonstrates this. Although the SHMA dates from 2009, the evidence has been reviewed in both the HLMA and the Council's Local Housing Requirements Study (LHRS) 2014 [J3].
27. Policy SS2 seeks the delivery of a minimum of 16,500 homes in Herefordshire in the plan period which equates to 825 dwellings per annum (dpa). The Council's evidence base for housing provision is set out in the LHMA. The update uses the standard methodology for determining housing need set out in Planning Practice Guidance (PPG).
28. The 2014 study arrives at an Objectively Assessed Need (OAN) for Herefordshire of between 15,400 and 16,200 (770 – 810 dpa) homes over the plan period. The lower end of 15,400 is based on the Office of National Statistics (ONS) 2012-based Sub-National Population Projections. The official 2008-based projections indicate household growth of 714 homes per annum; whilst the 2011-based interim projections indicate a need for 801 homes per annum. Looking at projected growth and household formation rate trends, the 2014 LHRS concludes that a part return to the 2008 projection would be appropriate, leading to a figure of around 735 households per year.
29. The LHRS takes into account long term migration trends, market signals, household formation rates, rate of development and demand, commuting rates and includes an allowance for vacant and second homes (informed by the 2011 census). Some small upward adjustments are made to the figures in the light of these factors, but generally, they have a limited impact on the range set out in the DCLG projected figures.
30. The LHRS looks at a range of economic growth projections including studies showing some 7,500 to around 9,000 new jobs are forecast using Experion and Oxford economics trend data (sensitivity tested with the higher spring 2014 figures) and this indicates that a higher level of housing might be necessary to support growth in employment [J3, section 3]. A range of scenarios have been modelled with a prediction of some 721 – 775 dpa to be necessary to meet housing need associated with economic growth. The economic policies of the plan have been considered with a focus on improving and promoting employment and an uplift to 16,200 homes which is higher than the modelled figures would appear sufficient to meet housing associated with economic growth. Representors suggest a cautious approach to the

figure in the light of the Marches Local Enterprise Plan's higher predicted growth.

31. The Marches Local Enterprise Partnership's Strategic Economic Plan (LHRS)[J3] identifies a higher number of potential jobs in the LEP area, pointing to areas such as the service sector, tourism and leisure where there are opportunities for growth. However, it covers three LPAs and the Plan does not make clear how the jobs could be split within the Local Authorities covered by the Marches LEP, including how many are thought to be needed in Herefordshire. Whilst I am satisfied that the Council's estimate is reasonable and justified, the final housing figure of 16,500 (825 dpa) has included an upward adjustment to cope with potentially greater employment growth should this arise.

Affordable housing

32. The LHMA considers the levels of need and supply of affordable housing. This takes account of information on housing costs and earnings, as well as the numbers of households and flows onto the housing register. A total affordable housing need for 3,457 homes is identified across Herefordshire over the 2012-17 period. This is equivalent to 691 dpa. The LHRS realistically indicates that having regard to the demographic and employment led projections, previous rates for the provision of affordable housing and the viability of new development in Herefordshire, building affordable homes at rate of 691dpa is highly unlikely to be achieved.
33. If the current need is distributed over the plan period to 2031, the annual housing need would fall to 369 homes per annum (2012-2031). Although it increases the time over which the affordable housing need would be met it is a more realistic assumption of what could be achieved. The study makes further adjustments to take into account concealed households and household formation rates (to see if they recover in the longer term). An adjustment is made to improve affordability (responding to market signals), and the LHRS reasonably concludes that the top end of 16,200 (810dpa) would help to meet the affordable housing need over the plan period.
34. However, a further upward adjustment is proposed to take into account the possibility of a greater economic uplift than forecast and this would help to increase the supply of affordable housing. The LHRS demonstrates that an overall figure of 16,500 (an uplift of between 2 – 7%) would boost the supply of housing and is a robust figure for the housing target.
35. During the course of the examination DCLG released the 2012-based household projections (published in February 2015). The projections indicate a more modest growth in households; the projections equating to household need of 14,200 homes (710 dpa) over the 2011-31 plan period. As the figures post-date the 2014 LHRS, the Council re-assessed the 2012 projections against all previous assumptions. They concluded that the latest household projections were not so dissimilar as to warrant a change to the OAN or net final housing figure. I am satisfied that retaining the housing target of 16,500 would be appropriate, and the target figure would be realistic and sufficient to provide for housing needs in Herefordshire.

36. In addition, to assist with the provision of affordable housing and boost the supply of housing for Hereford, the market towns and the rural areas within the CS are subject to MMs expressing them as a minimum. Settlement boundaries are to be defined in the NPs and DPDs for Hereford and Bromyard and the CS takes a positive approach to encourage housing development.
37. Policy H1 sets thresholds and targets for affordable housing for new development. The policy identifies a range of 25-40% of affordable housing varying between different areas in the county taking into account the housing needs of the different market areas and the viability of development. This is justified by the LHMA, the Rural Area Issues Paper and the whole plan viability assessment. The percentages sought for the strategic sites reflect the levels set out in policy H1.
38. A new national threshold for affordable housing was introduced in a written ministerial statement (WMS) in November 2014. **MM042** modified the submission plan policy H1 threshold to that of the WMS setting a new threshold of sites of more than 10 dwellings which have a maximum floor space of more than 1000 square metres. However, following a judgment in the High Court on 31 July 2015 (*West Berkshire District Council and Reading Borough Council v Secretary of State for Communities and Local Government [2015] EWHC 2222 (Admin)*) the High Court issued a Declaration Order on 4 August 2015 confirming that for various reasons the policies in the WMS must not be treated as a material consideration.
39. While the WMS thresholds no longer carry weight, the examination of the CS was based on the modified policy. The modified threshold formed the basis of supplementary evidence considering viability (Herefordshire viability testing supplementary report Feb 2015) the effect on the provision of affordable housing throughout the county and was consulted upon. The policy, as modified would be effective and bring forward affordable housing, although less so in the rural areas than the submission policy. However, as the submission policy was not tested during the examination I find **MM042** necessary to ensure that the Plan has a viable and sound affordable housing policy. If the Council wish to return to the submission policy they have the option of carrying out an early Plan review for policy H1.
40. There has been low housing growth in Herefordshire since at least 2008 as set out in the LHRS [J3] and the percentage of affordable housing identified in policy H1 is the result of balancing affordable housing against other strategic aims of the plan, including the development of large sites and associated social and transport infrastructure. In the circumstances, the approach to affordable housing is the reasonable and realistic and will bring forward much needed affordable housing.

Mix and range of houses (other than affordable housing)

41. Policy H3 would bring forward the type and range of housing to meet local needs, providing a flexible and responsive approach. This is supported by a number of documents. **MM044** adds necessary details to the policy explaining how it would be applied to make it effective. The NPs and Development Plan Documents for Hereford, Bromyard and the Rural Areas would also have appropriate policies to address the issues of type and mix of new homes for

specific areas. **MM06** adds a reference to the explanatory text for policy SS2 explaining how individual or group self-build projects would be supported to comply with national guidance. **MM03** adds clarity on Community Right to Build.

Traveller sites

42. At the time of the examination there were 34 Gypsy and Traveller sites with a total of 114 pitches, four tolerated sites with 21 pitches [PS55a]. The submission CS does not identify five years' worth of sites for travellers against locally set targets. However, alongside the CS the Council is preparing a Traveller's Sites Development Plan Document [PS4b] which they commit to producing quickly. The LDS (2015) [PS5] shows adoption in 2016 to ensure that it would not lag far behind the CS. The issues and options version and SA [PS4c] has been out to consultation and the Council are in the process of identifying land. They provided evidence of cross boundary co-operation on the document [PS40] and an up-to-date and comprehensive draft Traveller and Showperson Accommodation Assessment was completed in February 2015 [PS55a/b], as part of the evidence base for the Traveller Sites DPD. This showed that from 2014 to the end of the plan period some 33 traveller pitches, 8 showperson plots and 3 transit pitches would be needed. This has yet to be examined, but a five year land supply for traveller sites would be identified in the document as well as deliverable sites for the next 15 years.
43. To ensure that the Council can meet the needs of travellers until the DPD is adopted, policy H4 for travellers' sites is modified by **MM045**. The modification deletes all restrictive or prescriptive wording and introduces a supportive policy. The MM makes clear that planning applications do not have to provide evidence of need. The MM introduces criteria which seek to ensure that sites are appropriate for travellers by enabling mixed uses and promoting sites with good access to facilities. The MM is necessary to make the policy effective and sound. Policies H4 and Policy H2 enable small sites to be used specifically for affordable traveller's accommodation, to be considered as rural exceptions in small rural communities.
44. The Council had made reasonable progress with the DPD at the time of the hearing, and policy H4 is flexible and positively worded. Nevertheless, the Council must make the submission and adoption of a Travellers' Site DPD a key priority in order to plan effectively for the needs of the travelling community and meet the requirements of National Planning Policy for Traveller Sites and comply with the Public Sector Equality Duty. Although the lack of sites within the CS is not ideal, holding up the CS at this stage for completion of the DPD would delay major development coming forward on the strategic sites, and, because the Travellers' Sites DPD is identified to come forward soon the Council's approach would be reasonable.
45. Overall, the approach to the provision of housing is consistent with national policy and guidance, is based on a sound and thorough analysis of the current situation in the county, as demonstrated in the comprehensive and detailed evidence base.

Issue 3 - Whether the approach towards the supply and delivery of housing land is positively prepared, effective and consistent with national policy?

Housing land supply targets and the five year housing land supply

46. The spatial/development strategy rightly seeks to steer the majority of development to the key settlements and strategic sites which would provide access to jobs, services and public transport. The distribution of new housing and development proposed is appropriate, given the economies of scale/concentration of new infrastructure that is likely to assist delivery, particularly of the strategic sites. In recognition of the longer lead in times for the SUEs/UEAs and larger strategic sites, which could provide around a third of the housing, it is clear that more homes will be delivered in the middle and late stages of the plan. The CS indicative trajectory for expected completions shows a greater proportion of homes being delivered later on in the plan period. To address this, the Council considered various options in the Revised Preferred Option Background Paper [B6b]. The CS proposes a stepped housing target (reflecting the expected delivery rates) of 600 dpa for the first five years of the plan (2011-2016), 850 dpa for years 6-10 (2016-2021), 900 dpa for years 11-15 (2021-2026) and 950 dpa for years 16-20 (2026-2031) as a means of addressing this in relation to delivery targets. I consider that a stepped target would be a likely and not unexpected consequence of this approach.
47. In addition, figures show that the market has been depressed with a shortfall of over 900 dwellings as of April 2014 identified in the Housing Land Supply document of October 2014 [PS1a]. Although there has been significant increase in the land supply position during 2014 – 2015 and increase in housing, delivery would take some time to achieve. The target figures do not seek to constrain development which should come forward as soon as possible, but I accept that the stepped target would be realistic and a sound basis for monitoring and assessing land supply (including the five year housing land supply) throughout the plan period. In accordance with paragraph 47 of the NPPF to boost the supply of housing, a buffer of 20% would be appropriate for Herefordshire as there was a consensus that under delivery had been persistent from at least 2008 set out in the LHRS and housing position papers [PS1a and b]. To make clear the approach to the 5 year housing land supply, I have added wording to this effect to **MM07**.
48. During the examination the Council updated its position on the five year housing supply with the Update to Herefordshire Local Plan – Core Strategy Five Year Housing Land Supply, March 2015 [PH1]. The five year supply date was taken to be April 2014 (a reasonable date as the hearings took place in February 2015) – 31 March 2019. The stepped targets for these years were added together. The shortfall was added to the stepped target figure. Applying the 20% buffer (to the target plus the shortfall), a five year housing land supply could be demonstrated, albeit it with less than 5.5 years supply (see figure below). In this calculation the shortfall is spread over the five year housing period.

Extract from the Council's Housing Land Supply Position Statement March 2015:

This figure shows that with an indicative trajectory target and the shortfall being addressed over the forthcoming five years there would be a five year supply of housing land in the county:

A Core Strategy 2011 – 2031 16500

B Core Strategy requirement 1800 Using indicative trajectories: 1/4/2011 – 1/4/2014 600 dpa

C Homes Completed (net) 873 Net reduction includes demolitions and conversions 1/4/2011 – 31/3/2014

D Requirement for next five years 4000 using trajectories 15/16 – 600 pa (1yr) 16/17 – 19/20 – 850 pa (4yrs)

E Plus Residual Shortfall 927 (over next five years as per PPG)

F Plus 20% buffer 985 added after shortfall

G Total Requirement 5912

H Annualised requirement 1182

I Total Deliverable dwellings 6201

J **Housing Supply 5.24yrs**

49. The Council's preferred option is to spread the shortfall over the plan period which would, in addition to a stepped target, add a further delay to the provision of homes and would not be a proactive approach. Therefore, I conclude that for the CS to be positively prepared and for the five year housing land supply to be effective, the shortfall should be spread across the five year period. This approach would be consistent with the advice in the PPG.
50. Details of deliverable sites are contained with the Update to Herefordshire Local Plan – Core Strategy Five Year Housing Land Supply [PH1] March 2015 document. Their assessment complies with advice in the PPG about whether sites are deliverable. The sites include the CS strategic housing sites where they can make a contribution, sites with planning permission or a resolution to grant planning permission, assessment of NP sites (based on the SHLAA, emerging NP allocations and an assessment of deliverability), previously allocated sites where they are considered deliverable, past housing completions and a windfall allowance. The windfall allowance is justified by a figures from past monitoring reports [B21a-f] showing a consistent level of windfalls throughout the county over many years. The HLS provides information about the UEAs and SUEs, including ownership and progress towards submitting a planning application, and there is convincing information that these sites could start to deliver housing within the 5 year period.
51. The five year housing land supply (PH1) is marginal but realistic and to maintain this position the Council will have to closely monitor the sites shown on the indicative trajectory to deliver housing within the five year period, with appropriate action taken if the supply appears at risk. The way this will be undertaken to be effective is addressed in the paragraphs below.

Delivery

52. The reliance on larger sites coming forward later in the plan period is not without risk, particularly of delay in timing and the consequential failure to deliver the number of houses within the plan period. In this respect, one of the main concerns with the submitted Plan was the relationship between the supply and delivery of the strategic sites, critical infrastructure and/or the

impact on the environment. The CS identified three significant areas of risk: the proposed Hereford Relief Road (HRR); water infrastructure and the effect on the River Wye Special Area of Conservation (SAC).

53. *Hereford Relief Road.* The plan identifies a new strategic road, the Hereford Relief Road, to be built to the west of the city to ensure there is capacity and mitigate the effect of transport on the town centre and the A49 trunk road which runs through Hereford, from the three Hereford UEAs (HD3, HD4 and HD5) and the Hereford City centre development (HD1 and HD2). There is support for the approach from Highways England and it is likely that funding towards the HRR would come forward through developer contributions where appropriate, and the HRR may be delivered during the plan period.
54. However, the HRR is not identified in the Council's Local Transport Plan [C46a] as planned infrastructure, the funding is not secure and it is not part of Highways England (HE) Road Investment Strategy for 2015 – 2020 (Statement of Common Ground between the Council and HE). The route has not been modelled or identified in detail and there is a high degree of uncertainty about whether the HRR is viable and can be achieved within the plan period. A key consideration for soundness of the plan is, therefore, whether the substantial growth identified for Hereford is deliverable.
55. *Water Infrastructure.* Dŵr Cymru Welsh Water (DCWW), statutory undertakers providing water and sewerage infrastructure, make clear that the existing infrastructure would not be sufficient to cope with the identified growth across the county. However, over the plan period DCWW indicate that their investment programmes, in combination with improvements funded/undertaken by developers could provide the required infrastructure. The whole plan viability study 2014 satisfactorily addresses the implications for housing development identified in the Plan and the role of the developer; nevertheless, a co-ordinated approach with DCWW is required as set out in the Statement of Common Ground and other studies [C50a, PS57 and PS59] and this could affect the timing and the deliverability of sites.
56. *River Wye SAC.* The River Wye SAC is vulnerable to phosphate loading which could come from an increased flow of sewage into the rivers from a growth in housing in Leominster and the rural areas and from the location and construction of the HRR (place shaping policies LO1, LO2, RA1, RA2, RA6 and HD3). A Nutrient Management Plan November 2014 (NMP) [C51] has been produced by Natural England and the Environment Agency who have worked with the Council during preparation of the CS to manage planned growth and the effect on the SAC. The HRA May 2014 (updated in September 2014) [A5] concluded that an appropriate assessment (AA) was necessary and this was undertaken as part of the 2014 HRA. This concluded that having regard to mitigation measures required by CS place shaping and general policies, delivered in-combination with the measures set out in the NMP that there would not be an adverse effect on the integrity of the SAC from the plan as a whole.
57. The AA[A5] conclusions on the SAC are based on delivery rates set out in the trajectory for the achievement of the total housing target, and the related water cycle study, including water infrastructure improvements. At this stage the evidence shows that there would be no adverse effect; however, the level

of phosphates could be influenced throughout the plan period by a wide range of factors other than the Planned CS development. Although the NMP is an on-going programme addressing changes, the NPs and local area DPDs would require separate HRA's as would any planning applications for the Hereford Relief Road and development coming forward in Leominster and the rural areas. The financial implications for mitigation have been satisfactorily assessed in the whole plan viability study; nevertheless a co-ordinated approach with DCWW, EA and NE is required and this could affect the timing and the deliverability of sites.

58. The submission Plan policy SS3 sought to deal with the identified risks to the delivery of housing; however, the policy was worded in a negative way which would prevent or delay development if the critical infrastructure/mitigation measures were not in place. In addition, intervention strategies to address any delay were unclear and there was a lack of a site specific indicative trajectory, or targets and dates to monitor the delivery of development. The policy was unsound as it introduced a significant level of uncertainty about when and if the required housing could be delivered.
59. In order to ensure that the approach to supply, delivery and monitoring is sound taking into account the aforementioned factors **MM07** and **MM065** (in part) introduces a combination of measures enabled by a new policy to effectively monitor progress and take action necessary to ensure the delivery of the housing target.
60. Firstly, it introduces an appendix (5) to the Plan with a table identifying the necessary infrastructure, including links to the NMP, for each strategic site, and the date by which it is required. It identifies by number the amount of housing that can go ahead before the infrastructure becomes critical; it sets out a programme and key progressions points for the critical infrastructure so that progress can be monitored and it identifies what action will be taken if the delivery of infrastructure fails to progress as expected. Secondly, MM07 and MM065 introduce a revised, comprehensive trajectory (appendix 4) identifying all of the strategic sites, housing projected to come forward through NPs and local DPDs, and windfalls, against delivery for each year sufficient to meet the housing target of 16,500. Finally, a re-worded policy SS3 makes a commitment to annual monitoring against the revised housing trajectory, including the production of a policy monitoring document. It links a commitment to take action if critical infrastructure does not come forward as expected and it identifies measures to be undertaken if the housing falls below the projected target in any one year including identifying further land.
61. I am satisfied that this is a positive and flexible approach and the MMs are necessary to ensure that development can go ahead where it meets the plan policies, that there is always a forward looking monitoring process to identify problems with the critical infrastructure programme long in advance of any difficulties arising and appropriate action can be taken to ensure targets are met.
62. Overall, the approach to the supply and delivery of housing is consistent with national policy and guidance, is based on a sound and thorough analysis of the current situation in the county, as demonstrated in the comprehensive and detailed evidence base.

Issue 4 - Whether the approach to movement and transport is positively prepared, justified, effective and consistent with national policy?

63. SS4 – movement and Transport, is a positively worded policy reflecting the NPPF aim of promoting sustainable transport and facilitating sustainable development. It sits alongside and supports the wider CS approach to directing most development in the county to Hereford and the market towns to reduce unsustainable travel patterns. The policy identifies major transport infrastructure sought during the life of the plan as identified in a range of transport studies [C43a C47b]. The Edgar Street Grid Link Road is at an advanced stage and will support development of Hereford city centre. The HRR is mentioned, but I have dealt with the uncertainty of its delivery in the previous section of this report. Notwithstanding this, inclusion of the HRR in the policy would not be unsound as it remains a valid aim of the Council to bring this forward when possible as a means of improving the local transport network. Other infrastructure projects including the Leominster Relief road and park and choose/ride schemes would come forward as part of the development criteria of the UEAs/SUEs. **MM08** clarifies the wording of the policy, identifies the role of NPs, adds that contributions must meet the statutory tests and sets out partner organisations involved in implementation of the policy in order for the policy to be effective.
64. General policy MT1 – traffic management, highway safety and promoting active travel, sets out criteria, based on a range of supporting documents, to ensure that the effect of traffic on the network and highway safety is minimised and mitigated where necessary. **MM049** adds a reference to the use of travel plans to encourage active travel behaviour and clarifies some of the wording to make the policy effective.
65. Overall, the approach to the transport and movement has been positively prepared and is consistent with national policy and guidance.

Issue 5 - Whether the approach to employment is positively prepared, justified, effective and consistent with national policy?

66. The submitted Core Strategy policy SS5 seeks to provide 148 hectares (ha) of employment over the plan period at an average of 7.4ha per annum with a continuous supply of 37ha over a five year period. This was based on the Employment Land Study (ELS) 2012 [C6a] which updated the earlier Employment Land Provision Background Paper Revised version March 2009 considering options based upon labour demand projections and past trends.
67. There is no direct link between job numbers and employment in the CS. However, the HLRS makes clear that adjustments made to the past trend figures together with the aforementioned employment growth would ensure that the CS target of 148ha would be sufficient to meet employment needs during the plan period.
68. The Annual Land Monitoring Report 2014 [PS6] shows that some 61.5ha is available from recent planning permissions, with new strategic sites within or adjacent to Hereford, Leominster, Ledbury and Ross-on-Wye providing a

further 50ha. The new employment sites have been subject to the Economic Land Viability Assessment and whole plan viability test [C8] and there are no physical constraints that would prevent the sites coming forward. The ELS shows that with continuing investment at Rotherwas, a large business park to the southeast of Hereford (designated as Enterprise Zone), sufficient land would be available to achieve the overall target. The Plan commits to a regular 3 – 5 year review of the ELS and identification of further land through either a Plan review or a further DPD if necessary. **MM010** is necessary to make the policy effective as it links monitoring and review of the employment provision in policy SS5 to a new appendix (6), which provides the details and timescales for delivery.

69. Although there is some uncertainty about employment land coming forward toward the end of the plan period, the ELS shows that there is a good range and quantity of employment land in the county mostly focussed on the existing urban areas, particularly Hereford and there are a number of larger rural employment sites outside of existing settlements where further employment land could be focussed.
70. The type of employment use is not limited in the CS for the strategic sites (unless there is a site specific reason for doing so) nor are densities or plot ratios specified, in order to provide flexibility, choice and a locally responsive approach. Moreover, both the ELS and the HLRS predict that service sector jobs and agricultural diversity will represent the greatest increase and these would not necessarily be on identified employment land. In this regard **MM09** adds a sentence to the explanatory paragraphs for policy SS5 recognising and supporting small business. The SA of the Pre-Submission Publication (May 2014) [A4] indicates that Policy SS5 (Employment Provision) is likely to have a significant positive effect on employment, skills and the sustainable economy by supporting the provision of an appropriate quantum of employment land.
71. Policy SS5 is supported by general policies E1, E2, E3 and E4 which set out the way in which the Council will consider planning applications for new employment provision, criteria for when the loss of employment land may be acceptable, matters to be considered for homeworking and the promotion of tourism. **MM050 and MM051** are necessary to remove figures and information from the explanatory text which are out of date and introduce changes to wording of the policy E2 to clarify the Council's approach. **MM052** removes overly prescriptive text to policy E4 to ensure it is flexible. The MMs are necessary to make the policies effective and consistent with the NPPF.
72. Overall, the approach to the provision of employment is based on a sound and thorough analysis of the situation in the county, as demonstrated in the comprehensive evidence base and it is consistent with national policy and guidance.

Issue 6 - Whether the approach towards Town Centres and retail is justified, effective and consistent with national policy?

73. The CS identifies Hereford as a Sub Regional Shopping Centre, and the five towns in the county as Market Towns. Below this there are Local Shopping Centres and Neighbourhood Shopping Centres. The Town Centres Update Study 2012 [C41] indicates that the hierarchy of centres continues to reflect

their role and function in the county. The study identifies relatively modest need for retail space in the Market Towns which would not warrant strategic locations, and which could be accommodated within existing retail areas.

74. In Hereford the study demonstrates that because of the new shopping centre and regeneration programme in the city centre, additional retail floor space is unlikely to be needed until towards the end of the Plan period. The Hereford Area Plan DPD (HAP) will enable proposals to be advanced and sites to be identified to meet long term retail needs. There would be a need to provide appropriate local convenience facilities to serve the needs of the UEAs and this would be achieved through the place shaping policies for the strategic sites. Although the Plan encourages leisure and other town centre uses there is no identified need for sites to be allocated within the plan period.
75. General policies E5 and E6 provide the framework for determining proposals for town centres for all town centre uses. The CS aim is for Hereford and the Market Towns to be the focus for retail developments. In this respect, studies show that relatively small scale out of town development has affected the market towns [representor 149], and **MM053** reduces the threshold for the requirement for any retail, leisure or office development outside of the town centre (and not in accordance with the Plan) to provide an impact assessment. The modifications are carried through to the place shaping policies and other policies where thresholds are referred to throughout the CS. Although the threshold is significantly below that suggested in the NPPF, it is necessary to better reflect local circumstances, encourage a more sustainable approach in terms of transport and assists overarching aim of policy E6 for development to contribute and enhance the vitality and viability of town centres.
76. The submission Plan contained town centre maps which were unclear in terms of both their evidence base and appearance. In order for the retail policies to be effective **MM015, MM022, MM024, MM027, MM030 and MM035** are necessary for soundness of approach, deleting the town centre maps for Hereford, Bromyard, Kington, Ledbury, Leominster and Ross-on-Wye. The MMs indicate that the town centre boundaries will be established in the HAP, Bromyard DPD and NPs where a robust evidence base will be established. In the meantime the Unitary Development Plan maps (with the exception of Hereford) are clear and reasonable. However, in Hereford there have been significant changes within the town centre with large new shopping centre forming part of a wider regeneration scheme. The HAP is programmed in the Local Development Scheme [A7] to come forward in winter 2016/17 where the new town centre boundary will be established. There is a master-plan for the regeneration area, with clearly defined boundaries and I see no conflict or difficulty with implementation of the employment policies arising from this approach. **MM013** is necessary to make clear that the HAP will define the town centre boundary.
77. Overall, the approach to the provision of retail is consistent with national policy and guidance, is based on a sound and thorough analysis of the current situation in the county, as demonstrated in the comprehensive and detailed evidence base.

Issue 7 - Whether the approach towards the natural and built environment is justified, effective and consistent with national policy?

78. Overarching policy SS6 seeks development to conserve and enhance both the natural and built environment. It lists a wide range of environmental components to be considered in the planning process to achieve the policy aim. This is justified by a comprehensive evidence base, including heritage, townscape, landscape, biodiversity, geo-diversity and green infrastructure studies. **MM011** makes the policy sound by adding additional wording to clarify the components, explain the role of NPs, DPDs (in areas without NPs), and SPDs, in identifying local features, areas and sites defining local distinctiveness. Importantly MM011 removes an inaccurate and misleading sentence relating to mitigation. The modification also introduces additional wording to the supporting paragraph providing necessary information on the role of Natural England's conservation objectives for the SACs, Management Plans for the AONBs and SPDs and is necessary to make the policy sound.
79. General policies LD1, LD2, LD3 and LD4 support policy SS6. These relate to landscape and townscape, biodiversity and geo-diversity, green infrastructure, the historic environment and heritage assets respectively. They set out in more detail how the environmental components in Policy SS6 would be considered in the planning process. Although the overarching aims of the submission Plan policies are sound, their wording incorrectly reflected policy documents that preceded the NPPF. In order to make the policies sound **MM054, MM055, MM056 and MM057** update the wording to ensure that the policy considerations reflect the NPPF rather than superseded documents. **MM05** to overarching housing policy SS2 updates the policy in a similar way ensuring the reference to character and beauty of the countryside reflects national policy.
80. Policy SS7 addresses climate change. The supporting text recognises that this is a complex issue where government legislation may change and the measures identified would constantly be reviewed. The policy does not make reference to standards but sets out broad principles such as seeking development to be focussed in sustainable locations. It seeks pro-active strategies to be put forward to mitigate and adapt to climate change. **MM012** makes the policy sound by changing wording to better reflect the NPPF, including removing unnecessary and over-prescriptive detail.
81. SD1 relates to sustainable design and energy efficiency setting out a range of general principles that developments are required to consider. **MM058** removes unnecessarily prescriptive measures and simplifies text to ensure the policy is consistent with the provisions of the NPPF. The modification also alters explanatory paragraph to reflect the changes and is necessary to make the policy sound.
82. In a written ministerial statement (WMS) on 18 June 2015, the Secretary of State for Communities and Local Government set out new considerations to be applied to proposed wind energy development. The submitted CS policy SD2 was not consistent with the WMS in its promotion of wind energy development. **MM067** imposes a separate paragraph in the policy, replicating

the WMS criteria for consideration of wind energy development. It adds a paragraph to the explanatory text indicating that the Council will consider whether to identify suitable areas for wind energy through future development plan documents. MM067 is necessary to ensure that the policy is consistent with national guidance in enabling local residents to have a greater say in future development. **MM059** removes prescriptive tests relating to targets for renewable and low carbon energy which is necessary to introduce a flexible, more site specific approach. The modifications would make the policy sound. **MM060** clarifies and defines the sequential test in an extra paragraph to make the policy and its requirements clear.

83. In a WMS on 25th March 2015, the Secretary of State for Communities and Local Government set out new arrangements for the consideration of Housing Standards in the planning system. New additional optional Building Regulations on water and access and on space standards are described which can complement existing, mandatory Building Regulations. **MM066** deletes reference to residential development meeting Code for Sustainable Homes (Code) level 5 for water efficiency (seeking 80 litres per person per day) which was withdrawn by the WMS. However, the Council has worked closely with the Environment Agency, Natural England and Dŵr Cymru Welsh Water who support the approach of water efficiency standards to assist the management of nutrients in the River Wye SAC. Although the national optional standard (110 litres, per person, per day) introduced by the WMS is not as challenging a requirement as Code level 5, there is evidence in the Water Cycle Studies [C50a and PS57] that it would contribute towards the management of nutrients. MM066 replaces the requirement for Code level 5 with the national technical standard. There would be no significant implication for the NMP. It would have a lower impact on viability and would not affect delivery of new housing sought by the Plan. MM066 is necessary to ensure consistency with national policy by helping bring forward new homes whilst protecting the environment.
84. Overall, these policies would conserve and enhance the natural and built environment consistent with national policy and guidance. They are based on a sound and thorough analysis of the current situation in the county, as demonstrated in the comprehensive and detailed evidence base.

Issue 8 - Whether general policies SC1, OS1, OS2, SD4 and OS3 are justified, effective and consistent with national policy?

85. Policy SC1 relates to social and community facilities. **MM046** makes the policy sound by removing unnecessarily prescriptive text and adding a sentence relating to developer contributions to ensure that they can only be sought where they meet the relevant policy tests. The modification adds to the explanatory text to clarify the marketing criteria set out in the policy, ensuring that the policy would be effective. OS3 relates to loss of open space setting out principles that will be taken into account in development. This is a clear and positively worded policy which is sound and no modifications are proposed.
86. Policies OS1 and OS2 relate to the requirement for open space, sports and recreation facilities. **MM047** removes prescriptive standards from policy OS1 and makes associated changes to the explanatory text, reducing burdens and

making the policy more flexible and site specific. **MM048** removes out of date policy references from Policy OS2 and adds text to make the policy more flexible. MM047 and MM048 are necessary to ensure consistency with the NPPF aim of a flexible and positively prepared Plan.

87. SD4 relates to wastewater and river water quality and is soundly based on a wide range of aforementioned studies and assessments including the Strategic Flood Risk Assessment addendum (Feb 2015)[PS58] the HRA [A5], Statements of Common Ground between DCWW and the Council and the EA/NE and the Council, and the NMP [C51]. This is a positively worded and clear policy, identifying what information developers should provide and setting out measures that may be appropriate. No modifications are necessary to this policy to make it sound.

Issue 9 - Whether the place shaping policies for Hereford, the market towns of Bromyard, Ledbury, Leominster, Kington and Ross-on-Wye is effective and justified and consistent with national policy?

Hereford place shaping policies

88. Hereford is the main service and economic centre, with the highest population in the county. The majority of new housing proposed for the county (6,500 dwellings) would be accommodated in Hereford during the plan period with some 800 dwellings in the city centre (HD2), and some 2,500 dwellings in three urban expansion areas to the north, west and south of the city (HD4, HD5 and HD6). Around 15 hectares of employment land would be provided at the western and southern UEAs. The location and quantity of development was arrived at following consideration of a range of options and studies, for both Hereford and the county as a whole.
89. The Council is preparing the Hereford Area Plan DPD (HAP) expected in the LDS to be adopted in 2016/17, which together with neighbourhood plans (where necessary) provide for the remaining housing and set out more detailed policies for the city centre. The SHLAA [C25a] shows that there is capacity within the city for the remaining dwellings. The aforementioned **MM014** deleted a reference to neighbourhood plans assisting in this process. However, if there are changes to the Hereford settlement boundary in the HAP (which the Council advises is possible) it may cover some of the NP areas. Therefore, it is sensible to keep the reference to NP as this adds flexibility and I intend to amend the MM accordingly.
90. Within the city centre the Eign Gate and Edgar Street regeneration project is underway with the creation of a large shopping area and urban village. **MM015** adds to policy HD2 that "the majority" of the 800 new dwellings would be within the urban village, adding flexibility for the housing to be provided elsewhere in the city centre where there is capacity. The modification deletes unnecessarily prescriptive text from the policy, provides greater clarity in both the policy and the explanatory text to make the policy sound.
91. The CS recognises that the scale of development proposed in Hereford would place further demand on the city's constrained transport network. However, the submission Plan policy HD3 relating to movement failed to emphasise the importance of achieving and promoting sustainable transport to help address

demand. **MM016** adds text to the Hereford movement section to ensure that the focus of the policy, in line with the NPPF, is to facilitate sustainable transport. The modification deletes over prescriptive wording relating to contributions which could be in conflict with the policy tests for planning obligations and clarifies that funding would be sought by a variety of mechanisms as appropriate. The aforementioned Hereford Relief Road is identified as important infrastructure for Hereford. MM016 deals with the uncertainty of delivery linking the policy to SS3 which deals with the relationship between critical infrastructure and delivery making the policy sound.

92. HD4, HD5 and HD6 identify broad locations for the UEAs, the location and size derived at from information in the SHLAA and following several SAs [A4, B13 – B16c] of other alternatives and options as the plan progressed. The policies for the UEAs are criteria based setting out what development would be expected for each UEA, including access and infrastructure. **MM017, MM018** and **MM019** amend the wording of the policies HD4, HD5 and HD6 respectively to ensure consistent terminology is used, add the word “minimum” to the housing targets, remove duplication, incorporate a link to policy SS3 relating to general infrastructure and monitoring. The MMs are necessary to make the policies effective and sound. No modifications were proposed to HD7 relating to employment provision in Hereford. HD7, together with the aforementioned employment policies, would promote and encourage employment provision in Hereford.
93. The whole plan viability test assessed the policies and their requirements and found them to be viable, and I conclude that the place shaping policies for Hereford are sound.

Leominster place shaping policies

94. Leominster is the main centre in the north of the county with good transport links and the least constraints of the market towns. **MM028** updates the information in policy LO1 (the general policy identifying housing and employment targets for Leominster) and ensures terminology is consistent with the rest of the Plan. The modification makes clear that the Leominster NP will identify the dwellings numbers not sought in the UEA. **MM031** explains the role of the Nutrient Management Plan, in line with policy SS3.
95. A range of options for the location and quantity of housing was considered in the SA and earlier iterations [A4 and B13 – B16c] which justify the identification of a broad location for a large UEA (policy LO2) to the south west of the town to provide around 1,500 homes. The site is suitable and in a sustainable location [A4]. LO2 sets criteria for the development of the UEA and MM028 and **MM029** add the word “minimum” to the housing targets in policies LO1 and LO2, and alters the retail threshold to be consistent with other Plan policies and this makes the policy effective. **MM030** adjusts retail floor space levels to be consistent with other policies in the CS to clarify the policy approach set out in LO2.
96. The whole plan viability test assessed the policies and their requirements and found them to be viable, and I conclude that the place shaping policies for Leominster are sound.

Bromyard, Ledbury and Ross-on-Wye place shaping policies.

97. Bromyard, Ledbury and Ross-on-Wye are market towns of significance in the county. The SA and aforementioned SA options and alternatives show that the quantity of housing and employment would be proportionate, having regard to the size of the towns and their environmental constraints. The Plan identifies a Strategic Urban Extension (SUE) for each market town in a location which has been assessed in SA against all other reasonable options. The whole plan viability test shows that the development requirements for the relevant SUEs (policies BY2, LD2 and RW2) are achievable.
98. **MM020, MM021, MM025, MM026, MM032** and **MM033** update the information in policies BY1 and BY2 for Bromyard, LD1 and LD2 for Ledbury and RW1 and RW2 for Ross-on-Wye (and where necessary the associated text) to be consistent with the NPPF, add the word "minimum" to the housing target, and clarify the criteria for the SUEs to make the policies sound.
99. MM020 makes clear that Bromyard Town Council has decided not to produce a NP and that the Council will produce the Bromyard Development Plan (BPD) to identify sites for the remaining employment and housing sites not set out in the SUE. The LDS update (Feb 2015) [IN7] gives a timescale for Bromyard Development Plan for adoption in Winter 2016. **MM034** clarifies policy RW1 ensuring that the monitoring of employment land in Ross-on-Wye would be linked with policy SS5 making it effective.
100. MM025 and MM032 make clear that Ledbury and Ross-on-Wye will produce a NP to identify sites for housing/employment land, not addressed in the SUE policies. For Ledbury SUE/UEA, the submission plan policy LD2 tied down the primary and secondary vehicular access to two specific roads. This was too prescriptive given the early transport studies for the site. MM025 deletes the primary and secondary references and I am satisfied that this would make the policy sound in that it would be more flexible and effective. Further minor changes to the wording of the policy in terms of access suggested by the Council following responses to the main modifications would not be necessary for soundness and it would be up to the Council to impose them if they wish.
101. The whole plan viability test shows that the development requirements for the relevant SUEs (policies BY2, LD2 and RW2) are achievable and I conclude that the place shaping policies for Bromyard, Ledbury and Ross-on-Wye are sound.

Kington place shaping policies

102. Kington is the smallest of the market towns with significant environmental and locational constraints [A4]. The quantity of housing would be proportionate but given the constraints there may be a need to reassess the SHLAA for Kington to ensure that its target of around 200 homes in the plan period could be achieved. **MM023** clarifies policy KG1 identifying a NP as the means of allocating the land. It updates the information in the policy and adds clarity to the criteria. As Kington is an area where water infrastructure improvements are critical to delivery, MM023 adds information about the monitoring process linking this to policy SS3. The modifications make the place shaping policy for

Kington sound.

103. Overall, the place shaping policies for Hereford, the market towns of Bromyard, Ledbury, Leominster, Kington and Ross-on-Wye are effective and justified and they would achieve sustainable development.

Issue 10 – Whether the approach to the rural areas is positively prepared, is appropriate to the needs of the area, is soundly based and consistent with national policy?

104. A key element of the spatial strategy is the allocation of some 5,300 homes to the rural area. I have already concluded that strategic approach to the rural area relating to the quantity of housing is robust, and the SHLAA and Rural Housing Background Report 2013 [C30] shows that there is capacity within the villages and hamlets to achieve this. The rural area is diverse and the Rural Background Paper and the LHRs and the LHMA, provide robust evidence for the seven different market areas identified in the rural areas across the county and the approximate number of houses required based upon common housing market conditions.

105. However, each rural area has differing needs and requirements, and all sit within a rural landscape which must be recognised and respected. Therefore, a flexible and responsive approach is necessary to bring about the level of development sought by the Plan. I had significant concerns about whether submission Plan policies RA1 which set out the general approach to the housing market areas (HMA) and policy RA2 which set out the approach to how the villages would achieve this. They were very prescriptive, and the approach to quantities for the housing market areas and villages was confusing and seemingly inflexible, and it appeared to restrict development numbers. This left some uncertainty about the role of the NPs, the location of local housing and its overall delivery.

106. To make RA1 (and the associated explanatory text) sound **MM036** makes clear that the proportionate growth sought from within each HMA would be indicative. It adds that the indicative targets relate to the HMAs as a whole leaving flexibility for NPs to identify the most suitable housing sites. It sets out that local evidence and environmental factors would inform the scale of development. It indicates that the overall figure of 5,300 is a minimum target and therefore the indicative figures are not meant to be read as a cap on housing numbers.

107. To make RA2 (and the associated explanatory text sound), **MM037** clarifies the approach to be taken to the quantity and location of development. The submission Plan reasonably identifies the most sustainable villages within the HMAs capable of accommodating new housing based on a range of studies of the rural hierarchy and rural housing markets a [C30, C31 and C32]. Rather than be prescriptive **MM037** replaces text within the policy to ensure that the minimum target growth will be used to inform the level of housing within the settlements and that NPs will allocate sites for housing accordingly. It sets out a number of criteria followed through in the text to make the policy more responsive, having regard to the role and function of the settlement, housing type and landscape setting. The modification indicates that the Council are producing a Rural Areas Site Allocation DPD for parishes where there is no NP.

The LDS Update (February 2015) [IN7] indicates that the timescale for adoption to be Autumn 2017. **MM043** changes wording in rural exception housing policy H3 to be consistent with changes to RA2. The MMs make the approach to the rural settlements much more flexible and give immediate guidance to developers about where new housing may be appropriate making the policy sound.

108. For development within the open countryside **MM038** is necessary to add clarity to policy RA3 setting out where it would apply in order for it to be effective. It deletes over prescriptive text from the explanatory paragraphs to update the CS in line with the wording of the NPPF. The submission Plan Policy RA4 relating to agricultural, forestry and rural enterprise dwellings set restrictive criteria relating to the size of new homes which appeared to have no evidence base. **MM039** deletes the restrictive text and amends the associated explanatory texts removing unnecessary or prescriptive information enabling the policy to be flexible, effective and sound. **MM040** and **MM041** remove restrictive text from policy RA5 for the re-use of rural buildings and policy RA6 for the rural economy to ensure that it reflects changes to other rural policies. For RA5, the policy relates to both residential and economic uses and the MMs ensure that the policies accord with the approach to the rural areas set out in the NPPF.

109. Overall, the approach to the rural areas is positively prepared, is appropriate to the needs of the area, is soundly based and consistent with national policy.

Issue 11 – Whether the Core Strategy would monitor development and necessary infrastructure effectively?

110. The aforementioned modifications to SS3 relate to monitoring and action to be taken in relation to housing in terms of infrastructure delivery and monitoring. **MM061, MM062, MM063 and MM064** add/delete text to ensure that CS policy ID1 and the explanatory paragraphs would support the modifications made to SS3 and assist the delivery of infrastructure for all development identified by the plan. Crucially the MM clarifies that contributions from developers towards infrastructure can only be sought where they comply with the statutory tests and the NPPF. The text is updated to reflect the MMs to SS3 and ID1 and to make the policy sound. The **MM065** update of Appendix 1 relating to saved Unitary Development Plan policies is necessary to provide clarity, and a new appendix 3, the Infrastructure Delivery Plan, would assist with monitoring. I have deleted references to appendices 2, 7 and 8 which are not necessary as main modifications to make the plan sound.

111. Overall the plan would monitor development and necessary infrastructure effectively.

Assessment of Legal Compliance

112. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Core Strategy meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Herefordshire Local Plan Core Strategy is identified within the approved LDS January 2015 which sets out an expected adoption date of Summer 2016. The Herefordshire Local Plan Core Strategy's content and timing are generally compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in March 2007 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM)
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report (May 2014) sets out that the plan may have some negative impact, and an AA has been undertaken. This found that there would not be an adverse effect on the integrity of protected sites from the plan as a whole.
National Policy	The Local Plan complies with national policy except where indicated and modifications are recommended.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act (as amended) and 2012 Regulations.	The Herefordshire Local Plan Core Strategy complies with the Act and the Regulations.

Overall Conclusion and Recommendation

113. The Herefordshire Local Plan Core Strategy has a number of deficiencies in relation to soundness and legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

114. The Council has requested that I recommend main modifications to make the Plan sound and legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Herefordshire Local Plan Core Strategy satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Christine Thorby

INSPECTOR

This report is accompanied by the Appendix containing the Main Modifications.

Herefordshire Local Plan Core Strategy Main Modifications September 2015

Main Modifications

This schedule contains main modifications consulted on at various times between **20 March and 10 August 2015**.

1. All Policy numbers, paragraph numbers, figure numbers are taken from the Core Strategy Pre-Submission Publication May 2014.
2. For each main modification, information on the proposed change and the reason for that change is given. Where new wording is proposed to policies and the explanatory text it has been underlined. Where it is proposed to delete wording from policies or text this is shown as ~~crossed-out~~. Each Main Modification has been given a reference number beginning 'MM..'.

Ref No	Policy/ Para/ Figure	Proposed Main Modification
Minerals and Waste - the deletion of the minerals and waste policies and supporting text (Policies M1-6/W1-5) in the submitted plan and the commitment to future preparation of a separate minerals and waste plan		
MM01.	1.7	<p>Amend paragraph to read: When adopted, the Core Strategy policies will replace most Unitary Development Plan (UDP), 2007 policies. However, some of the policies contained in the previous UDP have been saved (see appendix 1) and will remain in force until replaced by other Development Plan Documents and Neighbourhood Development Plans. Together with the Hereford Area Plan DPD, Minerals and Waste Local Plan, <u>Natural Resources DPD, Travellers' Sites Document (DPD)</u> and other Development Plan Documents and Neighbourhood Development Plans, the Core Strategy will form the statutory "development plan" for Herefordshire. A Policies Map will set out the strategic designations in the County. <u>for all Development Plan Documents, once they have been examined and adopted. In the meantime, many environmental designations continue to be shown on the adopted Unitary Development Plan 2007 Proposals Map, which can be found on the council's website.</u></p>
1.13		<p>Delete existing paragraph: A Herefordshire Natural Resources Development Plan Document (Natural Resources DPD) will be prepared. This will establish targets and planning policies relating to minerals and waste activities and development for Herefordshire to cover the plan period to 2031. This DPD is included in the council's Local Development Scheme. <u>Natural resources Minerals and Waste</u> 1.13 Minerals and waste policies will be dealt with through a separate Minerals and Waste Local Plan development plan document (DPD). This will be produced taking account of the National Planning Policy Framework (NPPF), the minerals and waste sections of Planning Practice Guidance and up to date evidence base studies and ensuring close cooperation with neighbouring local authorities on cross-boundary issues. <u>It will establish targets and planning policies relating to minerals and waste activities and associated development in Herefordshire to cover the plan period to 2031. The timetable for the production of this DPD will be included in a revised Local Development Scheme. Until the Minerals and Waste Local Plan is adopted, the minerals and waste sections of the Herefordshire Unitary Development Plan will be 'saved' and remain in force until replaced by the Minerals and Waste Local Plan.</u></p>
2.35		<p>Delete Paragraph: Minerals and waste 2.35 Known mineral resources in Herefordshire are relatively limited in range, primarily consisting of aggregates (sand, gravel and crushed rock (limestone)). Aggregates from Herefordshire quarries supply both local markets and the wider area. The main non-aggregate mineral being worked is sandstone for use as building stone and roof tiles. In contrast to the aggregate quarries, the extraction of sandstone is a small-scale operation dependent on need and market demand. <u>The continued extraction of aggregates and sandstone will be required to meet future growth demands, local sandstone being vital for building restoration, as well as maintaining local characteristics.</u></p>

Ref No	Policy/ Para/ Figure	Proposed Main Modification
	2.36	Delete paragraph: In partnership with Worcestershire County Council, Herefordshire has prepared a Joint Municipal Waste Management Strategy up to 2034. This has been reviewed in light of legislative and fiscal changes. Waste levels have declined since 2004 and recent initiatives have been effective in increasing household recycling of waste (40% in 2010-11) and reducing the amount going to landfill. The levels of waste generated and how this is treated remain an issue, especially as populations grow.
	3.14	Amend paragraph to read: New development will be designed and constructed in ways to ensure that local distinctiveness is reinforced. The wider impacts of climate change will be addressed by reducing carbon emissions, minimising pollution and the risk of flooding, ensuring availability of natural resources and by providing appropriate waste management and recycling facilities and renewable energy schemes <u>The provision of appropriate waste management and recycling facilities and renewable energy schemes will be guided through the policies of the Minerals and Waste Local Plan.</u>
	Fig 3.1	Delete from third column for objective 11 Core Strategy policies – MN1-6, W1-5
	3.107	New waste facilities are to be integrated into sites suitable for industrial use close to the origin of such waste. Proposals to minimise waste, including re-use, recycling and treatment, will need to have been considered in the design of new large scale developments. Mineral resources are safeguarded through Minerals Safeguarding Areas and targets are set for sand, gravel and crushed rock extraction to meet adopted targets. The policies in the Place Shaping section and the general environmental quality policies will deliver this part of the strategy. The strategy of promoting better use of resources is dealt with in policies of the Place Shaping and general environmental policies sections. In addition, the Minerals and Waste Local Plan will provide guidance relating to the safeguarding of mineral resources.
	4.2.10	Amend paragraph to read: Non-strategic policies and proposals will be contained within the Hereford Area Plan, <u>Minerals and Waste Local Plan</u> , master plans and additional supplementary guidance. These documents will include consideration of: Amend 6 th bullet point to read: <ul style="list-style-type: none"> • <u>Enhancement proposals for the historic core and heritage assets including archaeology</u>
	New para after 4.2.81	Insert new section and paragraph after 4.2.81: Minerals <u>The expansion area is subject to a safeguarding policy in respect of mineral reserves (sand and gravel). Applications for development will be assessed in this respect using the saved UDP policy M5 until this is replaced by the Minerals and Waste Local Plan policy.</u>
	5.3.1	<u>Diagram following para 5.3.1</u>

Ref No	Policy/ Para/ Figure	Proposed Main Modification
		<p>Delete 3rd column labelled “Natural Resources minerals” Delete 4th column labelled “Natural Resources waste”</p> <p>Future planning policy The strategic policies outlined above will underpin site specific policies. Alongside Core Strategy policies, future components of Herefordshire Council’s Local Plan, <u>including the Minerals and Waste Local Plan</u>, other Development Plan Documents and supplementary planning documents, will be shaped through the relevant evidence base and consultation with local communities through Neighbourhood Development Plans</p>
5.3.71 to 5.3.113		<p>Delete Policies M1, M2, M3 M4, M5, M6, W1, W2, W3, W4 and W5 Delete everything from para 5.3.71 to para 5.3.113 inclusive</p>
	5.3.114	<p>Environmental quality monitoring indicators: In addition to the indicators listed in previous sections, the following indicators will be used to measure the effectiveness of the general policies (some are aspirational):</p> <ul style="list-style-type: none"> ▪ changes in the areas of designated nature conservation sites as a consequence of planning permission; ▪ proportion of local sites where positive conservation management has or is being implemented; ▪ number of listed buildings and scheduled ancient monuments on buildings at risk register (English Heritage); ▪ net change in condition of SSSI’s (Natural England); ▪ number of applications granted planning permission contrary to the advice of statutory agencies (e.g. English Heritage, Natural England or the Environment Agency); ▪ percentage of river length assessed as good biological or chemical quality (EA) in particular so far as they relate to the measures within the Nutrient Management Plan; ▪ phosphate levels within the River Wye SAC and adjoining tributaries that receive increased phosphates from Core Strategy growth; ▪ completed development that has resulted in loss/restoration/creation of <u>BAP Habitats of Principal Importance (Priority Habitats)</u>; ▪ percentage of total residential applications at below 30 dwellings per hectare; ▪ number of residential applications at less than 1.5 parking spaces per unit;

Ref No	Policy/ Para/ Figure	Proposed Main Modification
		<ul style="list-style-type: none"> ▪ the need for, frequency and outcomes of planning enforcement investigations/ planning appeals concerning the aspects of local loss of locally important buildings within a conservation area; ▪ number of developments meeting and surpassing national design standards; ▪ maintaining Herefordshire Council's County Site and Monuments Register; and ▪ comparison of mineral production figures with national and sub-national apportionments; ▪ estimates of permitted and useable land banks for aggregates (sand, gravel and crushed rock); ▪ after-use of sites especially wildlife habitat creation; ▪ the production of secondary (reused and recycled) aggregates; and ▪ data on the use of the railhead at Moreton-on-Lugg; and <ul style="list-style-type: none"> ▪ summary of proposals contributing to the Green Infrastructure Strategy from the above and any other measures.
Section 1: Introduction and Background		
MM02.	1.16	<p>After para 1.16 insert new paras:</p> <p><u>*** Neighbourhood development plans are required to be in general conformity with the strategic policies of the development plan for the area in order to meet 'the basic conditions' With this regard, the whole Core Strategy is defined as being 'the strategic policies contained within the development plan for the area' in terms of Paragraph 8 Schedule 4B of the Town and Country Planning Act (1990).</u></p> <p><u>*** Significant progress is being made on a number of neighbourhood development plans across the county. However, to ensure delivery, areas without a designed neighbourhood area by the adoption of the Core Strategy will be included within the 'Rural Area Site Allocation Development Plan Document'. Monitoring of neighbourhood plan progress will take place and consideration will be given to those areas not making progress to Regulation 14 draft by the Issues and Options stage of the Rural Area Site Allocation DPD for their inclusion within the document.</u></p>

Ref No	Policy/ Para/ Figure	Proposed Main Modification
MM03.	1.17	<p>Delete paragraph and replace with new paragraph. Through neighbourhood planning, local communities are able to choose where they want new homes, shops and offices to be built; have their say on what these new buildings should look like, and grant planning permission for the new buildings they want to see go ahead. For example, the 'Community Right to Build' programme allows communities to choose where and when to build homes, shops, facilities and businesses; depending entirely on what local people decide their community needs are. The Community Right to Build scheme will help communities to gain planning permission for the developments they want to take place, with the benefits of development (for example profits), being managed by a community organisation, for the community.</p> <p>The Community Right to Build enables community organisations to progress new local developments without the need to go through the normal planning application process, as long as the proposals meet certain criteria and there is community backing in a local referendum. <u>Communities may wish to build new homes or new community amenities, and providing they can demonstrate overwhelming local support, the Community Right to Build will give communities the powers to deliver this directly. All profits derived from a Community Right to Build must be used for the benefit of the community, for example to provide and maintain local facilities such as village halls. Communities which wish to use the new powers must produce and submit a Community Right to Build Order. A proposal can be developed as part of the Neighbourhood Development Plan, or on its own.</u></p>
MM04.	Fig 3.1	<p>8 To strengthen the economic viability of the market towns, villages rural settlements and their surrounding rural hinterlands areas by facilitating employment generation and diversification, improving delivery and access to services through housing (including affordable housing) and improved ICT as well as realising the value of the environment as an economic asset</p> <p>Insert new objective 8a :</p> <p><u>8a To support and to encourage the development and diversification of the county's historic strength in land-based industries, including agriculture and food production, to provide for the maintenance of a thriving, productive, efficient, competitive and sustainable agricultural sector, recognising the high importance of this sector to the county's economy as a whole and to the rural economy in particular."</u></p> <p>Core Strategy policies – SS5, RA6, E1</p>

MM05.	SS2	<p>Policy SS2 - Delivering new homes</p> <p>A supply of deliverable and developable land will be identified to secure the delivery of a minimum of 16,500 homes in Herefordshire between 2011 and 2031 to meet market and affordable housing need.</p> <p>Hereford is the focus for new housing development to support its role as the main centre in the county. Outside Hereford, the main focus for new housing development will take place in the market towns of Bromyard, Kington, Ledbury, Leominster and Ross on Wye, on existing or new allocations to enhance their roles as multi-functional centres for their surrounding rural hinterlands areas. In the rural areas new housing development will be acceptable where it helps to meet local housing needs and requirements, supports the rural economy and local services and facilities and is responsive to the needs of its community. Outside of villages, new development will be carefully controlled to protect the countryside for its own sake. <u>In the wider rural areas new housing will be carefully controlled reflecting the need to recognise the intrinsic character and beauty of the countryside.</u></p> <p>The use of previously developed land in sustainable locations will be encouraged. Residential density will be determined by local character and good quality design. The target net density across the county is between 30 and 50 dwellings per hectare, although this may be less in sensitive areas</p> <p>The broad distribution of new dwellings in the county will be a minimum of:</p> <table border="1" data-bbox="724 663 1145 1812"> <thead> <tr> <th>Place</th> <th>Facilities</th> <th>New homes</th> </tr> </thead> <tbody> <tr> <td>Hereford</td> <td>Wide range of services and main focus for development</td> <td>6,500</td> </tr> <tr> <td>Other urban areas – Bromyard, Kington, Ledbury, Leominster, Ross on Wye</td> <td>Range of services and reasonable transport provision – opportunities to strengthen role in meeting requirements of surrounding communities</td> <td>4,700</td> </tr> <tr> <td>Rural Villages Settlements see list in Place - Shaping section</td> <td>More limited range of services and some limited development potential but numerous locations</td> <td>5,300</td> </tr> </tbody> </table>	Place	Facilities	New homes	Hereford	Wide range of services and main focus for development	6,500	Other urban areas – Bromyard, Kington, Ledbury, Leominster, Ross on Wye	Range of services and reasonable transport provision – opportunities to strengthen role in meeting requirements of surrounding communities	4,700	Rural Villages Settlements see list in Place - Shaping section	More limited range of services and some limited development potential but numerous locations	5,300
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MM06.	3.40	<p>Delete the paragraph:</p> <p>“The ability for self-build homes and co-housing schemes to come forward either by individuals or community groups will be facilitated through Neighbourhood Development Plans or Development Plan Documents. These will look to allocate specific sites.</p>												

Ref No	Policy/ Para/ Figure	Proposed Main Modification
		<p>Replace with; <u>The council recognises that individual or group self and custom build projects will contribute to the delivery of homes over the plan period. These may be in the form of affordable, low cost market and open market housing. The council will encourage and support this type of development where the proposals are in line with the relevant policies of the Core Strategy and neighbourhood plans. Specific sites may be allocated for this type of development in Area and Neighbourhood Development Plans where a demand for this type of development has been demonstrated.</u></p>
Revisions to the delivery of housing growth and its links with infrastructure particularly Policy SS3:		
MM07.	SS3	<p>Delete existing <u>'Policy SS3 Releasing land for residential development'</u>: <u>Sufficient land for residential development will be released to ensure the Core Strategy housing target is achieved over the plan period. The release of specific sites may be phased or delayed to ensure that necessary infrastructure is in place to support the new development or in order to safeguard the integrity of the River Wye Special Area of Conservation (SAC) from significant adverse effects. In releasing residential land priority will be given to the identified strategic proposals and the re-use of brownfield land in sustainable locations. The approach towards release of sites will be kept under review through the annual monitoring process. If rates of delivery or evidence from monitoring indicate that the number of new dwellings will exceed or fall below the target figure by 20% over a period of 3 or more years, the timescales for the release of sites shown in Figure 3.5 will be reconsidered or Herefordshire Council will identify additional land through the preparation of other Development Plan Documents.</u></p> <p>and replace with: <u>Policy SS3 - Ensuring sufficient housing land delivery</u> <u>A sufficient supply of housing land will be maintained to ensure the delivery of the Core Strategy housing target as set out in Policy SS2 over the plan period. The rate of housing delivery and supply will be assessed through the annual monitoring process. If monitoring demonstrates that the number of new dwelling completions is below the cumulative target figure over a 12-month monitoring period (1 April – 31 March) as set out in the housing trajectory in Appendix 4 the Council will prioritise increasing housing supply in the following monitoring periods using appropriate mechanisms which, depending on the scale and nature of potential under-delivery, will include:</u></p> <ul style="list-style-type: none"> • <u>A partial review of the Local Plan – Core Strategy; or</u> • <u>The preparation of new Development Plan Documents; or</u> • <u>The preparation of an interim position statement and utilising evidence from the Strategic Housing Land Availability Assessment to identify additional housing land.</u>

Ref No	Policy/ Para/ Figure	Proposed Main Modification
		<p><u>A range of strategic housing proposals are identified which are key to the delivery of the spatial strategy. In addition there are elements of key infrastructure which will need to be provided to enable full delivery of the strategic housing targets. The Council will work with developers and other stakeholders to ensure the timely development of these strategic proposals and the key infrastructure requirements.</u></p> <p><u>Appendix 5 sets out the relationships between the delivery of housing and the timing of the main infrastructure requirements. It also identifies actions necessary to safeguard the integrity of the River Wye Special Area of Conservation (SAC) from significant adverse effects. The Council will actively monitor the relationships identified in this appendix. Any material delays in the implementation of identified infrastructure of environmental safeguards and which will lead to under-delivery of housing supply will inform the implementation of the range of measures set out above to ensure plan-led corrective measures are put in place.</u></p>
	3.42	<p>Overall the delivery of the housing levels and distribution proposed in the Core Strategy is dependent upon necessary infrastructure being funded and delivered. Figure 3.5 provides an initial indicative county-wide trajectory for the housing provision based upon the likely release of strategic sites in the county. This trajectory suggests that housing completions will be back-loaded, starting with around 600 dwellings per annum during the first five years of the plan period, with the highest levels of housing growth (950 per annum) taking place towards the end of the plan period. A detailed trajectory is set out in Appendix 4. The delivery of housing will be monitored throughout the plan period and may it will need further re-adjustment and added detail to reflect progress on the delivery of the strategic housing sites and key elements of infrastructure.</p>
	<p>New Para</p> <p>TEXT ADDED</p>	<p>Add new para after SS3 and before 3.43 as follows</p> <p><u>* ** The delivery and supply of new housing will be monitored on a regular basis and through the annual monitoring process in particular. Appendix 5 sets out an indicative trajectory for total housing completions, which will provide a basis for monitoring completions over the plan period. In the event that the monitoring process demonstrates that the rate of completions have fallen below targets, an early assessment will be made as to the most appropriate mechanism to boost housing delivery depending upon the scale and nature of the issue. The stepped target of 600 dpa for the first five years of the plan (2011-2016), 850 dpa for years 6-10 (2016-2021), 900 dpa for years 11-15 (2021-2026) and 950 dpa for years 16-20 (2026-2031) would be the basis for monitoring and assessing land supply (including the five year housing land supply) throughout the plan period. For calculation of the five year housing land supply, due to persistent under delivery a buffer of 20% is considered appropriate.</u></p>
	3.43	<p>The To achievement of the Core Strategy housing target for the plan period will be challenging, however, there may be is a need to phase the release of new development in specific instances in order to ensure that appropriate and necessary infrastructure is provided either prior to, or co-ordinated with, the development. This will be particularly the case in respect of major elements of infrastructure such as the Hereford Relief Road.</p>

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3.44		<p>In addition, the River Wye SAC currently includes sections where the water quality exceeds phosphate level targets and this excess-prevents sections of the river from achieving favourable condition. It is also necessary to ensure that sections of river currently meeting the water quality targets do not fail as a result of new development. Natural England and the Environment Agency have prepared a Nutrient Management Plan (NMP) which sets out to control and reduce phosphates in the SAC. The implementation of the actions in the NMP will facilitate the delivery of new development. Natural England and the Environment Agency have committed to the preparation of a Nutrient Management Plan (NMP), the aims of which are to control and reduce phosphates in the SAC. This will facilitate the delivery of new development. However, the requirements of the NMP may include the need to phase or delay the release of housing during the plan period. Policy SD4 in the General Policies section deals specifically with wastewater treatment and river water quality.</p>																																				
3.45		<p>“Figure 3.5 sets out an indicative trajectory for total housing completions, which will provide a basis for monitoring completions over the plan period. The supply of new housing will be monitored closely and if rates of development fall significantly below targets, an assessment will be made as to whether the early release of housing allocations is appropriate in order to boost delivery.”</p>																																				
3.46		<p>Delete paragraph: “The figure of 20% variation in rates of delivery, above or below, on a county wide basis will trigger the need to explore intervention. Delivery rates are anticipated to be lower in the early years of the Plan. Therefore considerations of the need for any interventions in the case of under delivery may not be required until the middle/latter stages of the plan period. It should be noted that the supply/delivery situation will not be based on single year delivery rates, but on an assessment of the situation over at least 3-5 years. Should completion rates significantly exceed anticipated rates of development, intervention will only be necessary where the rate of development is resulting in the objectives of the Core Strategy not being achieved.”</p>																																				
Fig 3.5	Delete Figure 3.5	<p>Figure 3.5—Indicative housing trajectory 2011–31</p> <table border="1" data-bbox="1155 423 1406 1525"> <thead> <tr> <th></th> <th>2011-16</th> <th>2016-21</th> <th>2021-26</th> <th>2026-31</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Hereford</td> <td>1000</td> <td>1500</td> <td>2000</td> <td>2000</td> <td>6500</td> </tr> <tr> <td>Leominster</td> <td>300</td> <td>500</td> <td>700</td> <td>800</td> <td>2300</td> </tr> <tr> <td>Ross-on-Wye</td> <td>250</td> <td>275</td> <td>175</td> <td>200</td> <td>900</td> </tr> <tr> <td>Ledbury</td> <td>180</td> <td>350</td> <td>210</td> <td>60</td> <td>800</td> </tr> <tr> <td>Bromyard</td> <td>120</td> <td>125</td> <td>125</td> <td>130</td> <td>500</td> </tr> </tbody> </table>		2011-16	2016-21	2021-26	2026-31	Total	Hereford	1000	1500	2000	2000	6500	Leominster	300	500	700	800	2300	Ross-on-Wye	250	275	175	200	900	Ledbury	180	350	210	60	800	Bromyard	120	125	125	130	500
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Hereford	1000	1500	2000	2000	6500																																	
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Bromyard	120	125	125	130	500																																	

Ref No	Policy/ Para/ Figure	Proposed Main Modification						
MM08.	SS4		Kington	30	40	60	70	200
			Rural Areas	1120	1460	1230	1490	5300
			Herefordshire	3000	4250	4500	4750	16500
MM08.		<p>SS4 – Movement and transportation</p> <p>New developments should be designed and located to minimise the impacts on the transport network; ensuring that journey times and the efficient and safe operation of the network are not detrimentally impacted. Furthermore, where practicable, development proposals should be accessible by and facilitate a genuine choice of modes of travel including walking, cycling and public transport.</p> <p>Development proposals that will generate high journey numbers should be in sustainable locations, accessible by means other than private car. Alternatively, such developments will be required to demonstrate that they can be made sustainable by reducing unsustainable transport patterns and promoting travel by walking, cycling and public transport</p> <p>“Proposals to provide new and improved existing public transport, walking and cycling infrastructure will be supported. Where appropriate, land and routes will be safeguarded as required in future local or neighbourhood development plans and developer contributions, <u>which meet the statutory tests</u>, sought to assist with the delivery of new sustainable transport infrastructure, including that required for alternative energy cars.”</p> <p>“Herefordshire Council will work with the Highways Agency, national organisations Network Rail, bus and train operators, developers and local communities to bring forward improvements to the local and strategic transport network to reduce congestion, improve air quality and road safety and offer greater transport choices, including the provision of the following major schemes:</p> <ul style="list-style-type: none"> • ESG Link Road (safeguarded route) and Transport Hub; • Hereford Relief Road; • South Leominster Relief Road; • Connect 2 Cycleway in Hereford; • Park and Ride schemes; and • other schemes identified in the Local Transport Plan and Infrastructure Delivery Plan. 						

Ref No	Policy/ Para/ Figure	Proposed Main Modification
MM09.	3.72	<p>Proposals which enable the transfer of freight from road to rail will be encouraged. Development proposals incorporating commercial vehicular movements that could detrimentally impact on the environmental quality, amenity, safety and character of the surrounding locality will be expected to incorporate evidence demonstrating how the traffic impacts are to be mitigated.</p> <p>Add to end of para: <u>The county has a high proportion of small and medium sized enterprises and the council will offer continuing support for such businesses in future.</u></p>
MM010.	3.76	<p><i>The Employment Land Study 2012</i> states that the emerging Core Strategy has an overall target of 148 hectares (ha) of available employment land over the plan period, which includes a rolling five year reservoir of 37 ha. Based on the output of projecting past completion rates, the overall target of 148 ha outlined in the emerging Core Strategy would provide a robust level of supply and would enable a wide range and choice of employment sites across the county to be provided throughout the plan period. Higher quality land referred to in this policy is that defined as “best” and “good” in the 2012 Study and is subject to more detailed discussion in policy E2. <u>Appendix 6 sets out details regarding the provision of strategic employment land and its delivery and monitoring and review</u></p>
MM011.	SS6	<p>Policy SS6 – Environmental quality and local distinctiveness</p> <p>Development proposals should conserve and enhance those environmental assets that contribute towards the county’s distinctiveness, in particular its settlement pattern, landscape, biodiversity and historic assets and especially those with specific environmental designations. In addition, proposals should maintain and improve the effectiveness of those ecosystems essential to the health and wellbeing of the county’s residents and its economy. Development proposals should be shaped through an integrated approach to planning the following environmental components from the outset, and based upon sufficient information to determine the effect upon each where they are relevant:</p> <ul style="list-style-type: none"> ▪ landscape, townscape and local distinctiveness, especially in Areas of Outstanding Natural Beauty; ▪ biodiversity and geodiversity especially Special Areas of Conservation and Sites of Special Scientific Interest ; ▪ historic environment and heritage assets especially Scheduled Monuments and Listed Buildings ▪ the network of green infrastructure; ▪ local amenity, including light pollution, air quality and tranquillity; ▪ agricultural and food productivity and soils; ▪ physical resources, including minerals, <u>soils</u>, management of waste, the water environment, renewable energy and energy conservation. <p>The management plans and conservation objectives of the county’s international and nationally important features and areas will be material to the <u>determination of relevant development proposals</u>. Furthermore assessments of local features, areas and sites <u>defining local</u></p>

Ref No	Policy/ Para/ Figure	Proposed Main Modification
		<p>distinctiveness in other development plan documents, neighbourhood development plans and supplementary planning documents where undertaken to define local distinctiveness should inform decisions upon proposals</p> <p>Where the benefits of proposals are considered to outweigh the adverse effects on the environment, or there are competing environmental objectives and full mitigation is not possible, compensatory measures should be advanced</p>
3.102		<p>The location of new development proposed should deliver sites that, in almost all cases, protect and/or enhance Herefordshire's natural, built, historic heritage and cultural assets in the county's cathedral city, historic market towns, smaller settlements and distinctive countryside. <u>In addition Natural England has prepared conservation objectives for each Special Area of Conservation within the county; it is also consulted upon proposals that might affect Sites of Special Scientific Interest and will be aware of management principles that may be relevant to the maintenance and achievement of their favourable conservation status. Management Plans have been prepared for both the Wye Valley and Malvern Hills Areas of Outstanding Natural Beauty. These documents will be relevant to the assessment of effects of development upon these important assets. The most rigorous approaches to assessing the effect of development should be taken for those areas with national or and international environmental designations, including proposals in areas outside but adjacent to having an effect upon them, in accordance with the protection afforded to such areas in the National Planning Policy Framework. Sites and features of local importance should also receive an appropriate level of protection when determining the effects of proposals upon the environment and local distinctiveness. Subsequent policies set out the approach that should be applied in relation to these and a number of supplementary planning documents are also referred in their supporting statement which will also be relevant. Appendix 8 provides lists of those which have been identified at the time of drafting this Core Strategy. However, locally important sites and features should also receive appropriate levels of care when determining the effect of development proposals upon them.</u></p>
MM012.	SS7	<p>Development proposals will be expected <u>required</u> to include measures which will mitigate their impact on climate change.</p> <p>At a strategic level, this will include:</p> <ul style="list-style-type: none"> • focussing development to the most sustainable locations; • delivering development that seeks to reduce the need to travel by private car and which encourages sustainable travel options including walking, cycling and public transport; • designing developments to reduce carbon emissions and use resources more efficiently; • promoting the use of decentralised and renewable or low carbon energy where appropriate;

Ref No	Policy/ Para/ Figure	Proposed Main Modification
		<ul style="list-style-type: none"> ● supporting affordable, local food production, processing and farming to reduce the county's contribution to food miles*; ● protecting the best agricultural land where possible; <p>Key considerations in terms of responses to climate change include:</p> <ul style="list-style-type: none"> ● taking into account the known physical and environmental constraints when identifying locations for development; ● ensuring design approaches are resilient to climate change impacts, including the use of passive solar design for heating and cooling and tree planting for shading; ● minimising the risk of flooding and making use of sustainable drainage methods; ● reducing heat island effects (for example through the provision of open space and water, planting and green roofs); ● reduction, re-use and recycling of waste with particular emphasis on waste minimisation on development sites; and ● developments must demonstrate water efficiency measures to reduce demand on water resources. including the use of efficient appliances and exploration of the potential for rainwater recycling <p>Adaptation through design approaches will be considered in more locally specific detail in a Design Code Supplementary Planning Document.</p>
Place Shaping - Hereford		
MM013.	4.2.7	<p>Amend paragraph to read:</p> <p>To achieve this vision, the following policies will ensure that Hereford maintains and enhances its role as a strategic centre. <u>Within the context of the wider Plan in general, and Policies HD1 to HD6 in particular "Hereford" should be regarded in policy terms as the area to be identified within the Hereford Area Plan. They policies reflect its capacity to accommodate additional development without significant harm to local communities and in sustainable locations. Concentrating the largest portion of the county's development in Hereford will help to develop and support the regeneration of the city in the long term, by capitalising on existing services and other infrastructure and providing greater opportunities for improving and increasing them. Policies HD2, HD4, HD5 and HD6 and the supporting text explain the requirements for the development at the urban extensions in terms of associated infrastructure and facilities</u></p>

Ref No	Policy/ Para/ Figure	Proposed Main Modification
MM014.	HD1 TEXT CHANGE	<p>Policy HD1- Hereford</p> <p>Hereford will accommodate a <u>a minimum of</u> 6,500 new homes within the plan period and a minimum of 15 ha of new employment land.</p> <p>Major residential development will take place in the following locations:</p> <ul style="list-style-type: none"> • Around 800 new dwellings in Hereford City Centre (HD2) • Around 500 dwellings at the Northern Urban Expansion Area (HD4) • Around 1,000 dwellings at the Western Urban Expansion Area (HD5) • Around 1,000 dwellings at the Southern Urban Expansion Area (HD6) <p>The remaining housing requirement of around 3,200 dwellings will be provided through the implementation of existing commitments, windfall development and <u>the development of</u> non-strategic sites allocated through the <u>production of the</u> Hereford Area Plan <u>or Neighbourhood Development Plans</u>.</p> <p>Major employment development will take place in the following locations:</p> <ul style="list-style-type: none"> • 10ha of employment land at the Western Urban Expansion area • Around 5ha of employment land at the Southern Urban Expansion area. <p>Further employment land provision will be made in accordance with Policy HD7</p>
MM015.	HD2	<p>Policy HD2 – Hereford city centre</p> <p>The city centre will accommodate around 800 new homes, <u>the majority</u> to be located within a new urban village. Further residential development will take place through the implementation of existing commitments, re-development of existing brownfield sites, re-use of upper floors above commercial premises, infill development and site allocations through the Hereford Area Plan. A target of 35% of these new homes will be mixed tenure affordable with a density that is compatible with the sustainable urban location of the site.</p> <p>The urban village will be served by safe and attractive pedestrian and cycle links to other areas of the city, the new transport interchange, the Courtyard Arts Centre and nearby areas of green space. A new Link Road will also serve development parcels forming part of the urban village connecting Edgar Street to the west and Commercial Road to the east (with a spur linking Blackfriars Street to the south), as well as assisting in reducing traffic within the core of the city.</p> <p>Newmarket Street, Blueschool Street and Commercial Square will be re-designed to become safe and attractive routes for pedestrian and cyclists, with improved public transport facilities and enhanced connectivity between the historic city centre and regeneration area partly facilitated by the construction of the new link road.</p>

Ref No	Policy/ Para/ Figure	Proposed Main Modification
		<p>The urban village will be complemented by other uses and infrastructure forming part of the wider regeneration area creating a sustainable mixed use development, <u>which respects and where possible enhances the historic environment</u>. These include the following:</p> <ul style="list-style-type: none"> • a canal basin forming the terminus of the Herefordshire and Gloucestershire Canal will be created <u>land and contributions towards a canal basin forming the terminus of the Herefordshire & Gloucestershire Canal, which is being delivered by the Hereford & Gloucester Canal Trust;</u> • <u>each stage of development which adjoins Widemarsh Brook will be</u> <u>maximise opportunities for enhanced for biodiversity, to provide flood relief and sustainable surface water drainage solutions and optimised as a green infrastructure link;</u> • <u>Herefordshire Council in partnership with public transport operators will deliver an integrated transport interchange</u> will be developed <u>close to the railway station to maximise opportunities for sustainable travel;</u> • <u>opportunities for new commercial, tourism, education (including tertiary facilities) leisure, health, civic and police and fire uses will be available to meet any identified need;</u> • <u>Herefordshire Council will work with the tenant(s) of Edgar Street football stadium to explore opportunities for</u> the a sports led mixed-use redevelopment of parts of Hereford United Football Ground, incorporating new spectator stands, will be sought; and <u>new public car parking facilities.</u> <p>In order to maintain and enhance the viability and vitality of the city centre, new retail uses will be focused to the core of the city centre as defined below. Any identified need for further major retail development over the plan period will be met through further development <u>within the Eign Gate and that part of the Edgar Street regeneration area which lies within the defined town centre</u>, including the former livestock market site <u>Old Market</u>, along Blueschool Street and through the refurbishment and re-development of the Buttermarket.</p> <p>Within Hereford city centre, new developments including changes of use will be approved where they:</p> <ul style="list-style-type: none"> • provide new commercial and office space in appropriate city centre locations including above existing retail and commercial premises; • maintain and enhance the vitality and viability of the city centre. Proposals for town centre uses outside the defined town centre will be subject to the sequential test and applications for development over <u>1,250 700</u> m² gross floor space will require an impact assessment to determine whether there could be any adverse impacts on the town centre; • improve overall accessibility by walking, cycling and public transport; • provide new, or enhanced sport, recreation and leisure facilities for local residents and visitors; • provide new and improve existing cultural and tourism attractions and facilities, which respect the city's historic character and local distinctiveness;

Ref No	Policy/ Para/ Figure	Proposed Main Modification
		<ul style="list-style-type: none"> enable the provision of a canal basin with associated wharfage and visitor centre; enable the protection, <u>conservation</u> restoration and enhancement of Hereford's natural and heritage assets <u>there</u> significance and setting, including archaeology, with particular regard to the historic street patterns and the skyline.
4.2.16		<p>Amend paragraph to read: The development of the urban village will provide the <u>majority</u> of the around 800 new homes in the city centre. These will comprise a mixture of apartments and family housing at a minimum average density of 50 dwellings per hectare. 35% of these homes will be affordable, with different types of tenures available, to satisfy identified local needs. Housing will be delivered that meets the needs of all sections of the community, including housing for older persons – a need highlighted in the study of the <i>Housing and Support Needs of Older People in Herefordshire 2012</i>. All homes will be constructed to high energy efficiency standards in accordance with other policies in this plan</p>
4.2.21		<p>Proposals for office uses outside the city centre will be subject to the sequential approach, as outlined in policy E5. Proposals for offices which have a gross floor space of <u>1,250 700</u> m² or over, outside the city centre will be required to provide an impact assessment which meets the requirements of the National Planning Policy Framework and policy E5</p>
4.2.27		<p><u>Community and Education facilities</u> Contributions and/or community infrastructure levy monies will be sought from new development for the enhancement of primary and secondary education facilities to accommodate increased demand from new residents. <u>The city centre will play a role in providing greater access to higher education. At the time of adoption there is an ambition to create a University in Hereford, the principal of which is fully supported by Policy SC1</u></p>
4.2.31		<p>The city centre of Hereford, referred to as 'town centre' for purposes of Policy E5, is defined in Figure 4.3 and includes primary and secondary frontages <u>which will be defined by the Hereford Area Plan (HAP)</u>. Retail development will be concentrated in the town centre. Applications for proposals which have a gross floor space of <u>1,250-700</u> m² or over, outside the defined centre as defined by the HAP, will be required to provide an impact assessment which meets the requirements of the National Planning Policy Framework and policies E5 and E6</p>
4.2.37		<p>Any proposals for leisure uses outside the <u>city</u> town centre, having a gross floor space of <u>1,250 700</u> m² or over, will be subject to the sequential test and be required to provide an impact assessment which meets the requirements of the National Planning Policy Framework and policy E5.</p>
Fig 4.3		<p>Delete Figure 4.3, and replace with a new map showing the Old Market and Link Road to set the city centre into proper context at time of adoption</p>
MM016.	HD3	<u>Policy HD3 - Hereford movement</u>

Ref No	Policy/ Para/ Figure	Proposed Main Modification
		<p>Herefordshire Council will:</p> <ul style="list-style-type: none"> • maintain and improve Hereford's economy by increasing connectivity to the national and local transport networks by reducing congestion and improving journey time reliability using a range of funding mechanisms including council funding, public funding, European funding, developer contributions and/or community infrastructure levy monies to fund the following: • <u>improve health, wellbeing and the environment by improving air quality and reducing noise through maximising opportunities for the use of sustainable transport modes, particularly for short distance journeys.</u> <p><u>Herefordshire Council will use a variety of funding mechanisms to deliver the following:</u></p> <ul style="list-style-type: none"> • packages of transport improvements focussing on key routes into the city delivering a range of public realm improvements and improving access and connectivity for pedestrians, cyclists and bus sustainable mode users; • <u>Behavioural change campaigns which will complement infrastructure delivery to encourage sustainable mode use and healthy lifestyles.</u> • reduced reliance on car use by incorporating walking, cycling and bus sustainable mode routes within new developments and connecting them with existing networks; • improvements to public transport infrastructure enabling improved access and integration between bus and to rail services; • <u>convenient, safe and secure car parking facilities which attract shoppers and visitors and deter commuter parking in the city centre, through the development of Park and Ride, Park and Share and Park and Cycle Park and Choose sites; and</u> • a <u>western-Relief Road to the west of Hereford</u> to reduce the volume of traffic from the city centre and enable the delivery of walking, cycling and bus improvements on the existing highway network. The road will be designed and developed in such a way which avoids and mitigates adverse impacts or physical damage to or loss of habitats, noise pollution and vibration, light pollution, air pollution, flood risk and water quality on the River Wye SAC, as well as residential amenity and business interests. Consideration of the impact of the road on heritage assets, their significance and setting, as well as the historic character of the wider landscape will also be required. <u>Further assessments will be undertaken as part of the Hereford Area Plan and subsequent planning application(s).</u> <p><u>The pace of delivery of transport and movement infrastructure will be aligned with that of housing provision in accordance with policy SS3."</u></p>
MM017.	HD4	<p>Policy HD4 – Northern Urban Expansion (Holmer West)</p> <p><u>Land at Holmer west will deliver a comprehensively planned sustainable urban expansion. The new development will be sensitively integrated into both the existing urban fabric of Hereford, and the wider landscape, through high design and sustainability standards. The development will be expected to provide:</u></p>

Ref No	Policy/ Para/ Figure	Proposed Main Modification
		<p>Land at Holmer west will deliver a comprehensively planned sustainable urban expansion incorporated into the urban fabric of Hereford, which meets high design and sustainability standards. New developments will be sensitively integrated into the existing landscape. Any potential impacts on the local environment, heritage assets or biodiversity should be mitigated and measures taken to conserve and enhance areas of important environmental, historic and landscape quality. The development will be expected to provide:</p> <ul style="list-style-type: none"> • Around 500 new homes, at an average density of up to 35 dwellings per hectare, comprising a mix of market and affordable house sizes and types that meet the requirements of policy H3 and the needs identified in the latest version of the <i>Herefordshire Local Housing Market Assessment</i>; • a target of 35% of the total number of dwellings shall be affordable housing; • a minimum of a 350-space Park and Ride (Choose site (land and infrastructure) adjacent to the western side of the A49 in close proximity to the Hereford Relief Road and land or a contribution to facilitate the construction of the adjoining phase of the Hereford Relief Road; • walking and cycle routes and green infrastructure corridors linking to the Park and Ride site, the existing public right of way network and existing education and community facilities and employment sites in the locality; • appropriate new green buffers and linear green routes, particularly along Ayles Brook; • measures to mitigate flood risk both for the new homes within the expansion area and for the benefit of existing residents and businesses in other parts of the city through the incorporation of sustainable urban drainage solutions, as part of the green infrastructure network and measures to control water levels within Ayles Brook; • appropriate provision of and contributions towards indoor and outdoor sports and play facilities, open space and allotments; • where appropriate a contribution towards a pre-school facility and provision of/contributions towards the enhancement of existing primary and secondary school provision in the locality and any identified need for other community infrastructure/facilities; and • sustainable standards of design and construction. <p>This expansion area will be accessed primarily off the A4103 Roman Road. The area will be planned in a comprehensive manner to show the layout of development and the required infrastructure. Appendix 5 sets out the relationship between the development of urban expansion areas and the provision of key new infrastructure. This expansion area will be accessed primarily off the A4103 Roman Road but is also dependent on the expanded capacity of the A49 by the provision of sustainable transport measures and the construction of future phases of a Hereford Relief Road. Contributions will be required from the development for Hereford transportation improvements including new infrastructure and sustainable transport measures. A detailed masterplan will be required to show the layout of development and the required infrastructure. This will be progressed and finalised within the Hereford Area Plan</p>

Ref No	Policy/ Para/ Figure	Proposed Main Modification
	4.2.55	<p>Amend paragraph to read: <u>This policy will deliver a minimum of around 500 new homes will be provided within the Holmer west area. All will be built to high energy efficiency standards. A target of 35% will be affordable. Housing will be delivered that meets the needs of all sections of the community including housing for older persons – a need highlighted in the study of the Housing and Support needs of Older People in Herefordshire 2012. The design and styles of the new housing will complement the built and landscape character of the locality and the scale and density will be reflective of the topography and prominence of the area. The development will need to be laid out and all homes and community buildings constructed to a high sustainability standard to ensure energy and water usage is minimised and sustainably sourced materials are used where practicable. This will include the use of renewables and other low carbon energy sources</u></p>
MM018.	HD5	<p>Policy HD5 – Western Urban Expansion (Three Elms) <u>The area will be planned in a comprehensive manner to show the layout of development and the required infrastructure. Appendix 5 sets out the relationship between the development of urban expansion areas and the provision of key new infrastructure. Land north-west of the city centre is identified for a sustainable mixed use urban expansion to be comprehensively masterplanned to form a series of inter-related new neighbourhoods.</u>—The development will be expected to provide:</p> <ul style="list-style-type: none"> ● <u>a minimum of around 1,000 homes, at an average density of up to 35 dwellings per hectare, comprising a mix of market and affordable house sizes and types that meet the requirements of policy H3 and the needs identified in the latest version of the Herefordshire Local Housing Market Assessment;</u> ● <u>a target of 35% of the total number of dwellings shall be affordable housing;</u> ● <u>delivery of land and infrastructure to facilitate the construction of the adjoining phase of the Hereford Relief Road;</u> ● <u>a minimum of 10 hectares of employment land, comprising predominantly of a mixture of use class B1, B2 and B8 located near to the new livestock market with access to the Hereford Relief Road and Roman Road;</u> ● <u>Park & Choose site (land and infrastructure); land and infrastructure for a transport interchange of around 150 spaces;</u> ● <u>a new linear park along the Yazor Brook corridor connecting with the existing green infrastructure links east of the expansion area, the public rights of way network within and adjoining the expansion area and informal recreation space;</u> ● <u>a series of new green infrastructure connections which enhance the biodiversity value of the area and also serve as pedestrian cycle links through the development, including optimising the use of the disused railway line to connect with the transport interchange, schools, community facilities, employment land and the remainder of the city;</u> ● <u>provision for new bus links through the expansion area;</u> ● <u>development of bespoke, high quality and inclusive design, including accommodation that will meet the needs of older persons and contributes to the distinctiveness of the site and surrounding environment;</u> ● <u>the provision on site of appropriate sports and play facilities, formal and informal open space, community orchards, woodland</u>

Ref No	Policy/ Para/ Figure	Proposed Main Modification
		<ul style="list-style-type: none"> • planting and allotments; • integration of Huntington village into the development area in a way which respects preserves and, where possible, enhances the setting of the Conservation Area and heritage assets; • a new 210 place primary school places with additional pre-school accommodation on the development; • an extension of Whitecross High School to increase capacity from a 6 form entry to 7 form entry school, with commensurate school playing field provision; • a neighbourhood community hub to meet any identified need for small scale convenience retail, community meeting space, health provision, indoor sports and other community infrastructure/facilities where appropriate; • sustainable urban drainage and flood mitigation solutions to form an integral part of the green infrastructure network; • opportunities to mitigate flood risk arising from Yazor Brook for existing residents and businesses within the city; and • sustainable standards of design and construction. <p>The area will be planned in a comprehensive manner to show the layout of development and the required infrastructure. Appendix 5 sets out the relationship between the development of urban expansion areas and the provision of key new infrastructure. This location is also dependent on the expanded capacity of the A49 and local highway network by the provision of sustainable transport measures and/or the construction of future phases of the Hereford Relief Road. Contributions will be required from this development for Hereford transportation improvements including new infrastructure and sustainable transport measures and other infrastructure improvements identified in the <i>Infrastructure Delivery Plan</i></p>
4.2.67		<p>Amend paragraph to read: This policy will deliver a minimum of around 1,000 new homes will be provided within the western expansion area. Around 35% of the total number of dwellings will be affordable housing to be distributed in small clusters across the development. Housing will be delivered that meets the needs of all sections of the community, including housing for older persons – a need highlighted in the study of the <i>Housing and Support needs of Older People in Herefordshire 2012</i>.</p>
MM019.	HD6	<p>Policy HD6 - Southern Urban Expansion (Lower Bullingham) Land at Lower Bullingham will deliver a comprehensively planned sustainable urban expansion. The new development will be sensitively integrated into both the existing urban fabric of Hereford, and the wider landscape, through high design and sustainability standards. Land located south west of Rotherwas Enterprise Zone and north of the B4399 (Rotherwas Access Road) is identified for a sustainable mixed use urban expansion. The development will be expected to provide:</p>

Ref No	Policy/ Para/ Figure	Proposed Main Modification
		<ul style="list-style-type: none"> • a <u>minimum of 1,000 new homes, at an average density of up to 35 dwellings per hectare, comprising a mix of market and affordable house sizes and types that meet the requirements of policy H3 and the needs identified in the latest version of the Herefordshire Local Housing Market Assessment;</u> • a <u>target of 35% of the total number of dwellings shall be affordable housing;</u> • <u>around 5 hectares of employment land comprising a mixture of use class B1, B2 and B8 to complement Hereford Enterprise Zone;</u> • <u>suitable vehicular access to the site principally from the B4399;</u> • <u>a minimum of a 350-space Park and Ride Choose site (land and infrastructure) adjacent to the A49/ Rotherwas Access Road roundabout;</u> • <u>green infrastructure corridors through the area to include strategic greenways along Red Brook and Norton Brook and links with Withy Brook;</u> • <u>creation of a country park to incorporate new footpaths linking with the existing public right of way network in the locality, woodland and orchard planting;</u> • <u>development of bespoke, high quality and inclusive design, including accommodation that will meet the needs of older persons and contributes to the distinctiveness of the site and surrounding environment;</u> • <u>the provision on site of appropriate sports and play facilities, open space, community orchards and allotments;</u> • <u>a new 210 place primary school places and where appropriate contributions towards new additional pre-school accommodation facilities;</u> • <u>a neighbourhood community hub, including small scale convenience retail and provision of and/or contributions towards any identified need for other community infrastructure/facilities, including community meeting space and health provision, indoor and outdoor sports where appropriate;</u> • <u>sustainable urban drainage and flood mitigation solutions to form an integral part of the green infrastructure network;</u> • <u>new direct walking, cycling and bus links from the urban extension to the Park and Ride Choose to the west, Hereford Enterprise Zone to the east and existing communities and the city centre to the north;</u> • <u>sustainable standards of design and construction; and</u> • <u>the protection conservation and, where possible, enhancement of the heritage assets their significance and setting. An evaluation of the archaeological importance of the area should be provided to ensure appropriate protection of heritage assets and inform detailed development proposals in this area.</u> <p><u>The area will be planned in a comprehensive manner to show the layout of development and the required infrastructure. Appendix 5 sets out the relationship between the development of urban expansion area and the provision of key new infrastructure This location is also dependent on the expanded capacity of the A49, by the provision of sustainable transport measures and the construction of future phases of the Hereford Relief Road. Contributions will be required from this development for Hereford transportation improvements including new infrastructure and</u></p>

Ref No	Policy/ Para/ Figure	Proposed Main Modification
	4.2.84	<p>sustainable transport measures</p> <p>This policy seeks to deliver around a minimum of 1,000 new homes of one to five bedrooms in size, A with a minimum of 35% of the total number of dwellings will be affordable housing, to be distributed in small clusters across the development. Housing will also be delivered that meets the needs of all sections of the community including housing for older persons – a need highlighted in the study of the <i>Housing and Support needs of Older People in Herefordshire 2012</i>. The housing will be predominantly two storeys in height, reflecting the residential character of the locality.</p>
Place Shaping: Bromyard:		
MM020.	BY1	<p>Policy BY1 – Development in Bromyard</p> <p>Amend first paragraph:</p> <p>Bromyard will accommodate around a <u>minimum of</u> 500 new homes together with around 5 hectares of new employment land during the plan period. The majority of new development will be located in the north western areas of the town with a total of around a <u>minimum of</u> 250 new homes. Around 5ha of employment land will also be required to come forward through the <u>Neighbourhood-Bromyard Development Plan</u> process. Further development will take place through the implementation of existing commitments, windfall development and sites allocated through a Neighbourhood Development Plan or other Development Plan Document. the <u>Bromyard Development Plan.</u></p>
MM021.	BY2	<p>Policy BY2 – Land at Hardwick Bank</p> <p>Delete first line and first bullet point of policy and replace as follows:</p> <p>Development proposals at Land at Hardwick Bank will be expected to bring forward the following to achieve a sustainable urban extension of the town:</p> <ul style="list-style-type: none"> • a comprehensively planned, mixed use development of around a minimum of 250 new homes at an average density of up to 35 dwellings per hectare comprising a mix of market and affordable house sizes and types that meet the requirements of Policy H3 and the needs identified in the latest version of the Herefordshire Local Housing Market Assessment; <p><u>Land at Hardwick Bank will deliver a comprehensively planned sustainable urban extension to the town and will be expected to deliver:</u></p> <ul style="list-style-type: none"> <u>• a minimum of 250 new homes at an average density of up to 35 dwellings per hectare comprising a mix of market and affordable house sizes and types that meet the requirements of Policy H3 and the needs identified in the latest version of the Herefordshire Local Housing Market Assessment”</u> <u>• a target of 40% of the total number of dwellings shall be affordable housing;</u> <u>• a new formal park to form part of the residential development complemented by new play and sports facilities and allotments;</u> <u>• “the development areas should be linked by a suitable vehicular access, likely to take the form of a roundabout, onto the A44. The</u>

Ref No	Policy/ Para/ Figure	Proposed Main Modification
		<p>development areas should also be serviced by a residential road which will allow for opportunities to extend development beyond the plan period and serve as a future link road route to other parts of the local highway network.</p> <ul style="list-style-type: none"> • the residential roads leading off Winslow Road should be utilised to provide sustainable links to the town (including pedestrian and cycle links) as well as public transport links between the area and the town centre; • the provision of and contributions towards any identified need for new/improved community facilities. This shall include improvements to classroom provision for the local primary school which should incorporate publicly accessible youth facilities; • a high standard of design and layout which respects the townscape, landscape and green infrastructure of the area; • sustainable standards of design and construction; • incorporate significant landscape buffers to mitigate the impacts of the development areas on the wider landscape; • an evaluation of the archaeological importance of the area in order to ensure appropriate protection of heritage assets and inform the detailed development proposals; and • a comprehensive sustainable urban drainage system which includes measures such as rain gardens and swales to manage ground and surface water drainage and safeguard against any increased flood risk.
4.3.3		<p>Delete and replace first word of paragraph: At least A minimum of 250 new homes will be provided within the Hardwick Bank area, north-west of the town.</p>
4.3.4		<p>Add a new sentence prior to the penultimate sentence to read:</p> <p>The policy to deliver around 5 hectares of employment land through a Neighbourhood <u>Bromyard</u> Development Plan will help create greater and more diverse employment opportunities for Bromyard. Any employment development is likely to need significant landscaping to mitigate any visual impact. If employment land is adjacent to existing housing, it will be necessary to co-ordinate both developments to achieve greater economies of scale and ensure neighbouring land uses are compatible. This may include the restriction of the employment areas next to the residential to use class B1 or suitable live/work units. <u>The Bromyard Development Plan will seek to identify the required employment land of five hectares. Given the level of constraints in Bromyard the delivery of employment land over the plan period will be closely monitored and reviewed if necessary.</u> The policy enabling small scale employment/mixed use opportunities as part of housing development will allow for a more sustainable development reducing the need to travel. Further small scale sites for employment use will be identified through a Neighbourhood Development Plan and/or other Development Plan Documents <u>the Bromyard Development Plan.</u></p>
4.3.6		<p>Amend paragraph: The highway infrastructure within the new development area should also facilitate a new road link on the periphery of the development a connection for vehicular access which will serve the proposed new land uses over the plan period but. <u>It</u> must also be designed so as not to prejudice the delivery of additional development beyond the plan period and the eventual completion of a full road link <u>connection</u> from the A44 to Tenbury Road.</p>

Ref No	Policy/ Para/ Figure	Proposed Main Modification
MM022.	4.3.14	The town retains a modest amount of comparison goods expenditure from existing residents and any opportunity to increase this part of the offer will be dependent upon the market having the necessary confidence in the town. New homes in Bromyard with enhanced means of access into town should strengthen support for the town centre's vitality and viability. The town centre is defined in Figure 4.6 and relates to Policy E5. The size threshold of 200 m2 set out in Policy E5 indicates when impact testing will be required.
	Fig 4.6	Delete figure 4.6.
Place Shaping Kington		
MM023.	KG1	<p>Policy KG1 – Development in Kington Kington will accommodate around 200 new homes during the plan period with the location of sites being identified through a Neighbourhood Development Plan or other Development Plan Document. A Neighbourhood Development Plan will allocate sites to meet this level of housing. In addition, provision for new employment uses should be brought forward to meet needs from within the Kington and West Herefordshire Housing Sub-Market Area.</p> <p>Development proposals for Kington will be encouraged where they:</p> <ul style="list-style-type: none"> • deliver affordable housing in accordance with the requirements of Policy H1; • provide a mix of market and affordable house sizes and types that meet the requirements of Policy H3 and the needs identified in the latest version of the <i>Herefordshire Local Housing Market Assessment</i>; • enable an overall density of up to 35 dwellings per hectare; • enable home working; • make available small scale employment sites, brought forward in balance with housing within the Kington and West Herefordshire Housing Sub-Market Area; • maintain and enhance the vitality and viability of the town centre. Proposals for new retail, leisure or office development of over 200m² in gross floor space and located outside the defined town centre will need to be supported by an impact assessment in accordance with the National Planning Policy Framework, to determine whether there could be any adverse impacts on the vitality and viability of the Kington town centre; • make provision for green infrastructure and amenity space, including play facilities, community access to open space, and the linking of habitats into ecological networks within and surrounding the town; • make provision for or improve walking and cycling links to the town centre, schools, shopping and employment; • maintain protect, conserve and where necessary possible, enhance the historic character of Kington, in particular the features that contribute to the Conservation Area; and its significance and setting, including particular features, its heritage assets, important buildings, scenic views and landscape features surrounding the town;” • have demonstrated engagement and consultation with the community including the town/parish council.

Ref No	Policy/ Para/ Figure	Proposed Main Modification
	4.4.3	<p>Amend paragraph to read: Approximately 200 new homes will be delivered in Kington between 2011 and 2031, with sites allocated through a Neighbourhood Development Plan or other Development Plan Document. Sites within the existing confines of the town are constrained in terms of flooding. Developing peripheral sites will require compromise in terms of effect upon the landscape. Choice of sites should seek those with least impact and where the provision of significant landscape and townscape mitigation measures can best be achieved. Phasing may <u>will</u> be necessary where this is required to enable time to overcome current infrastructure constraints. <u>Given the level of constraints in Kington, the delivery of housing over the plan period will be closely monitored. If this monitoring process indicates that it will not be possible to deliver the required level of housing, the Council will use appropriate mechanisms to address the situation in accordance with policy SS3. This may include a review of this policy.</u></p>
	4.4.5	<p>The policy encourages the development of small scale employment opportunities at Kington. Hutton Gardens Industrial Estate was developed as a rural development initiative and is currently thriving. An additional similar facility which would benefit both the town and its hinterland surrounding rural area. It may not be possible for such provision to be located within or even immediately adjacent to the existing town. The consideration of such sites should not adversely affect the town's setting and other environmental features but should be within walking distance and should ensure the town's setting and other environmental features are not adversely affected. Enabling working from home in accordance with Policy E3 – Home Working may reduce the level of need although the provision for small scale employment opportunities is expected to remain.</p>
MM024.	4.4.7	<p>Herefordshire Town Centre Study Update 2012 suggests the expenditure forecast for Kington over the plan period is unlikely to be of a scale to require proposals for further convenience floor space. Many of the smaller units within the town could absorb more turnover within existing floor space. The town centre area for the town is reflected in Figure 4.8 and the viability and vitality of this area should be protected. The size threshold of 200 m2 indicates when impact testing will be required. The Neighbourhood Development Plan or other Development Plan Documents should <u>will</u> determine the level of flexibility given to uses within the town centre area.</p>
	Fig 4.8	Delete Figure 4.8
Place Shaping Ledbury		

MM025.	LB1	<p>Policy LB1- Development in Ledbury</p> <p>Ledbury will accommodate <u>around a minimum of 800 new homes</u> balanced with <u>approximately a minimum of 15 hectares</u> of new employment land during the plan period. The majority of new housing development will be focussed to the north of the town as set out in Policy LB2 and the strategic location for new employment of <u>around 12 hectares</u> is to the west of the town, south of Little Marcle Road. Further development will take place through the implementation of existing commitments, infill development, and sites allocated through a Neighbourhood Development Plan or other Development Plan Document. A number of sites which have future potential for development have been identified in the <i>Strategic Housing Land Availability Assessment (SHLAA)</i>.</p> <p>Within Ledbury, new development proposals will be encouraged where they:</p> <ul style="list-style-type: none"> • allow for suitable small scale employment sites including live work opportunities within or adjoining the town; • maintain and enhance the vitality and viability of the existing town centre. Proposals for new retail, leisure or office development of over <u>500 400m²</u> in gross floor space and located outside the town centre will need to be supported by an impact assessment to determine whether there could be any adverse impacts on the town centre; • improve accessibility within Ledbury by walking, cycling and public transport, particularly where they enhance connectivity with, for example, local facilities, new employment areas and the town centre; • contribute to addressing deficiencies in community facilities and/or allow for infrastructure improvements (including broadband) in the town, to promote sustainable development; • reflect and enhance the characteristic built historic elements of Ledbury, such as its stone, brick and timber-framed buildings, medieval plan form, conservation areas and setting overlooking the Leaden Valley; • protect and enhance its green infrastructure, including connections to the public right of way network and biodiversity, particularly the Malvern Hills Area of Outstanding Natural Beauty to the east and the Leaden valley to the west; • incorporate mitigation measures to protect and enhance the setting of the town from eastern and western viewpoints and <u>where this is not possible incorporate appropriate mitigation measures</u>; and • have demonstrated engagement and consultation with the community including the town council.
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<p>MM026.</p>	<p>LB2</p>	<p>Policy LB2 - Land north of the Viaduct</p> <p>Development proposals north of the viaduct in Ledbury will be expected to bring forward the following to achieve a sustainable mixed use urban extension of the town:</p> <ul style="list-style-type: none"> • a mixed use development of around 625 new homes, at an average density of around 40 dwellings per hectare, comprising a mix of market and affordable house sizes and types that meet the requirements of Policy H3 and the needs identified in the latest version of the Herefordshire Local Housing Market Assessment; • Around 3 hectares of employment land, restricted to Use Class B1, to be located along the northern and eastern boundary adjoining existing businesses; • a target of 40% of the total number of dwellings to be affordable housing; • land and contributions to facilitate a restored canal to be delivered in partnership with the Herefordshire and Gloucestershire Canal Trust; • a new linear informal park to link to the existing town trail, riverside walk, recreational open space and existing allotments; • the provision of and <u>developer</u> contributions towards any identified need for new/improved community facilities/infrastructure improvements. This shall include a new 210 place primary school within the development (or an expansion of the existing primary school) and new recreational open space, play, indoor and outdoor sport facilities delivered through developer contributions; • primary vehicular access to the development will be from <u>either</u> the Hereford Road under the viaduct with the option of a secondary access or from the Bromyard Road to the north; • appropriate mitigation to safeguard the amenity of future occupants from unacceptable levels of noise and to safeguard the continued operation of existing businesses adjoining the area; • development of bespoke, high quality and inclusive design, including accommodation that will meet the needs of older persons and that contributes to the distinctiveness of this part of Ledbury and respects the <u>setting and significance</u> of the listed viaduct and the Malvern Hills Area of Outstanding Natural Beauty; • safeguards to ensure there is no adverse impact on water quality and quantity in the River Leadon; • new walking, cycling and bus links from the urban extension directly to the town trail and riverside walk under the viaduct, the railway station and town centre to create linkages to nearby development and existing community facilities; • sustainable standards of design and construction; and <p>a comprehensive sustainable urban drainage system which includes measures such as rain gardens and swales to manage ground and surface water drainage and safeguard against any increased flood risk.</p>
	<p>4.5.7</p>	<p>Amend first sentence: Vehicular, pedestrian, cycle and bus access to the housing site will primarily be under the viaduct <u>will need to be provided</u>, with additional sustainable transport links to the north linking with the station. If required, the provision of a secondary vehicular access on to the Bromyard Road would also then enable the creation of a road link. A reduction in the speed limit along the Bromyard Road and improvements to the Hereford Road/Bromyard Road junction are also likely to be required to improve the design, safety and efficiency of this road and junction. These, and other highway improvements, will be informed by a traffic assessment.</p>

MM027.	4.5.14	The policy for shopping in Ledbury, based on the evidence in the <i>Town Centres Study Update 2012</i> , is to maintain the existing, thriving centre which is based on a mixture of popular high street and independent stores. New homes and households in Ledbury will strengthen this support for the town centre and improvements to sustainable modes of transport into the town centre via the existing town trail will also support this approach. A town centre area is defined in Figure 4.11 and relates to Policy E6.
	Figure 4.11.	Delete figure. 4.11
Place Shaping - Leominster		
MM028.	LO1	<p>Policy LO1 – Development in Leominster</p> <p>Leominster will accommodate a minimum of 2,300 new homes throughout the plan period, (2011-2031) of which approximately a minimum of 1,500 dwellings will be provided in a single strategic urban extension to the south-west of the town. The remaining dwellings will be provided through existing commitments, smaller scale non-strategic sites within the existing built up area; those which come forward through the Leominster Neighbourhood Development Plan or other Development Plan Documents, or sites judged as having development potential which are identified in the Strategic Housing Land Availability Assessment.</p> <p>The Leominster Enterprise Park will continue to serve the employment needs of Leominster, which will include a further extension of up to 10ha to the south of the enterprise park. The release of the additional land will be phased across the plan period depending upon the availability or otherwise of land within the existing enterprise park.</p> <p>In Leominster new development proposals will be encouraged where they:</p> <ul style="list-style-type: none"> • continue the development of the Leominster Enterprise Park and encourage proposals for suitable small scale employment sites within the town; • maintain and enhance the viability and vitality of the town centre. Proposals for new retail, leisure or office development of over 500 400m² in gross floor space and located outside of the defined town centre will need to be supported by an impact assessment in accordance with the National Planning Policy Framework to determine whether there could be any adverse impacts on the vitality and viability of Leominster town centre; • ensure that developments do not exacerbate air pollution levels within the designated air quality management area at Bargates; • ensure that development does not undermine the achievement of water quality targets in accordance with Policy SD3 and SD4; and • have demonstrated engagement and consultation with the community including the town/parish council.
MM029.	LO2	<p>Policy LO2 – Leominster urban extension</p> <p>Development proposals at Leominster urban extension will be expected to bring forward Land south west of Leominster will deliver a comprehensively planned sustainable urban extension and will be expected to deliver:</p> <ul style="list-style-type: none"> • a minimum of 1,500 new homes at an average density of up to 35 dwellings per hectare comprising a mix of market and

Ref No	Policy/ Para/ Figure	Proposed Main Modification
		<p>affordable house sizes and types that meet the requirements of Policy H3, and the needs identified in the latest version of the <i>Herefordshire Local Housing Market Assessment</i>;</p> <ul style="list-style-type: none"> • an affordable housing target of 25% will be required as an opportunity to address the range of homes currently available in the town; • a south-west Leominster relief road linking the Worcester Road roundabout directly to the A44, to help relieve traffic congestion within the town and improve air quality in the Bargates area; • small scale neighbourhood retail facilities; • potential for employment opportunities as demand arises in the form of use class B1 and live/work units; • provision of appropriate community and youth facilities within a community hub; • provision of a new 420 place primary school and pre-school facilities; • appropriate provision of on-site open space, sports and recreation provision (in addition to Cockcroft Hill). This shall include fully accessible semi-natural and natural greenspace; play provision for all age groups, indoor and outdoor sports provision (some of which may be off site); allotments and new orchard planting; • new green infrastructure walking and cycling links to the town centre, schools, the Enterprise Park and local public right of way network; • retention of the highly sensitive landscape areas and geological features of Cockcroft Hill (which encompasses Ryelands Croft) by retaining this site as natural open space; • sustainable standards of design and construction; • a comprehensive sustainable urban drainage system which includes measures such as rain gardens and swales to manage ground and surface water drainage and safeguard against any increased flood risk; and • an evaluation of the archaeological importance of the area in order to ensure appropriate protection of heritage assets and inform the detailed development proposals. <p>The land available for development to the south-west of Leominster will also enable the housing needs of the town to be met beyond the plan period.</p>
	4.6.5	<p>Amend second sentence: At least A minimum of 1,500 homes will be provided within the urban extension up to 2031 together with a range of other facilities to enable the development to meet the needs of its residents and integrate with the existing town.</p>
MM030.	4.6.20	<p>The need for comparison retail proposals is more limited with a modest capacity towards the end of the plan period. The study indicated that the priority should be to steer any new floorspace to the town centre as far as this is practical, and only to permit out-of-centre facilities if they would materially enhance the retail offer of the town and assist in retaining catchment residents' expenditure The study indicates that an impact assessments will should be required for developments of 500m² <u>400m²</u> of floorspace and greater and this is reflected in Policy E5.</p>

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	4.6.22	Delete following words from the end of the sentence and add new sentence: More detailed assessment of the need for future retail provision for Leominster, including the need to allocate sites will be provided through the preparation of a Neighbourhood Development Plan and/or other Development Plan Documents. The extent of the town centre and the primary shopping area, (made up of the primary and secondary frontages) will be defined as part of the Neighbourhood Development Plan
	Fig 4.14	Delete Figure 4.14
MM031.	4.6.24	Add new paragraph to follow paragraph 4.6.24: “Sections of the River Wye SAC where the water quality targets are already exceeded will be subject to measures to reduce nutrients in line with the targets. All new development proposals including the Leominster urban extension must not compromise the ability of the Nutrient Management Plan to deliver the necessary overall reductions along these stretches.”
Place Shaping – Ross-on-Wye		
MM032.	RW1	<p>Policy RW1 – Development in Ross-on-Wye</p> <p>Ross-on-Wye will accommodate around a minimum of 900 new homes, balanced with approximately 10 hectares of existing allocated employment land during the plan period, in accordance with the spatial strategy. A strategic housing location will focus new residential development a minimum of 200 new homes to the south east of the town. Further development will take place through the implementation of existing commitment, infill development and peripheral town sites allocated through a Neighbourhood Development Plan or other Development Plan Document. The remaining requirement for homes will be delivered on sites allocated through a Neighbourhood Development Plan.</p> <p>Within Ross-on-Wye, new development proposals will be encouraged where they:</p> <ul style="list-style-type: none"> • allow for suitable employment sites, including live-work opportunities within or adjoining the town; • maintain and enhance the vitality and viability of the town centre. Proposals for new retail, leisure or office development of over 500 400m² gross floor space and located outside the town centre will need to be supported by an impact assessment to determine whether there could be any adverse impacts on the town centre; • improve accessibility within Ross-on-Wye by walking, cycling and public transport, particularly where they enhance connectivity with local facilities, the town centre and existing employment areas; • contribute to efficiencies in towards new or improved community facilities and/or allow for infrastructure improvements in the town to promote sustainable development; • reflect and enhance the characteristic natural and built historic elements of Ross-on-Wye, such as its red sandstone and timber framed Tudor buildings and boundary walls, the medieval plan form, conservation area and natural setting overlooking the River Wye;

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MM033.	RW2	<ul style="list-style-type: none"> • enhance green infrastructure and biodiversity, particularly the Wye Valley Area of Outstanding Natural Beauty and the River Wye; and • have demonstrated engagement and consultation with the community including the town/parish council. <p>Policy RW2 – Land at Hildersley</p> <p>The strategic residential development proposal on land to the south east of Ross-on-Wye at Hildersley will be required to bring forward <u>include</u> the following to achieve <u>deliver a comprehensively planned</u> sustainable urban extension of the town:</p> <ul style="list-style-type: none"> • around <u>a minimum of</u> 200 new homes at an average density of up to 35 dwellings per hectare, comprising a mix of market and affordable house sizes and types that meet the requirements of Policy H3 and the needs identified in the latest version of the Herefordshire Local Housing Market Assessment; • a target of 40% of the total number of dwellings shall be affordable housing; • the provision of and contributions towards any identified need for new/improved community facilities/infrastructure improvements. This shall include contributions towards the provision of: additional pre-school places; additional classrooms at John Kyrle High School for secondary, post 16 and youth/community infrastructure and further special educational needs provision; • the provision of a sport/recreation space either on or off site as an alternative to the existing on site John Kyrle High School playing field; • the creation of new green infrastructure within the development area to benefit residents, local bat populations and other flora and fauna; • new pedestrian and cycle links from the area towards the town and nearby employment sites, to ease road congestion and limit CO₂ emissions; • appropriate mitigation measures to be implemented, which ensure that acoustic and safety issues relating to the proximity of the adjacent firing range are satisfactorily addressed; • adverse impacts on the Water Source Protection Zone should be avoided or mitigated, including through the incorporation of sustainable urban drainage solutions such as rain gardens and swales; and the production by the developer of a Surface Water Management Plan; • avoid and mitigate adverse impacts from noise and air pollution and vibration (during both construction and occupation of new homes) on the River Wye SAC, Wye Valley Woodlands SAC and the Wye Valley and Forest of Dean Bat Sites <u>SAC</u>; and • development of bespoke, high quality and inclusive design, including accommodation that will meet the needs of older persons and that contributes to the distinctiveness of this part of Ross-on-Wye and enhances the setting of the adjacent Wye Valley Area of Outstanding Natural Beauty.

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MM034.	New Para	Insert new paragraph after 4.7.10 * * * * The need for additional employment land to serve the needs of Ross-on-Wye and surrounding areas will be monitored during the Plan period. Any identified additional need will be addressed through: <u>development coming forward in accordance with policies SS5, RW1, E1 and E3 of the Plan; a review of the Local Plan Core Strategy; or a Neighbourhood Development Plan or other Development Plan Document for the area.</u> "
MM035.	4.7.19	Amend paragraph to read: A town centre is identified in Figure 4.17 and relates to Policy E5 and E6. This map draws a line around the main shopping streets and ensures that previously underused, often vacant retail units are available for alternative forms of development, such as residential, which will drive an improvement in the environmental quality of such areas. The town centre for Ross-on-Wye is identified on the 'saved' Herefordshire Unitary Development Plan proposals map. This will be reviewed through the identification of Primary Shopping Areas in the Neighbourhood Development Plan. Saved policies can be viewed in Appendix 1.
	Fig 4.17	Delete Fig 4.17 Ross-on-Wye Town Centre
Revisions to rural development policies RA1 to RA6 and supporting text		
MM036.	4.8.6	'By virtue of these attributes, The rural area of each HMA has differing future housing needs and requirements. which this locality incorporated The approach adopted in this plan sets out aims to respond to these needs and requirements in a flexible and responsive way more closely. Together with the roll out of the neighbourhood planning agenda, this strategy will empower more communities to benefit from meaningful development, continuing to evolve as sustainable places whilst respecting the their fundamental rural character of Herefordshire.'
	4.8.9	The Housing development in rural areas will be delivered through Neighbourhood Development Plans, any required Rural Areas Site Allocations Development Plan Document and a combination of existing commitments, and windfall development. and sites enabled through Neighbourhood Development Plans. For those communities not committed to the advancement of a Neighbourhood Development Plan, Herefordshire Council may consider allocating housing through Development Plan Documents in order to ensure the delivery of rural housing sites. The council's Strategic Housing Land Availability Assessment indicates there is potential for this the level of development proposed in this policy. in Herefordshire's rural villages.
	4.8.11	The indicative minimum rural HMA target will underpin assist in informing the scale of development in the settlements villages identified in each HMA. The target represents a level of growth for villages, as a percentage, and which that is considered proportionate to existing HMA characteristics. and reflective of future housing needs and requirements within that area. For individual villages of each HMA this is translated

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	Paragraph 4.8.13 (below 4.8.12)	<p>as a percentage of the total number of dwellings in the village core (not parish). For example, the growth target for a village of 100 dwellings located within Bromyard HMA (which has a 15% target) would be approximately 15 new dwellings over the plan period 2011 to 2031.</p> <p>On this basis, all villages All settlements identified in Figures 4.20 and 4.21 will have the opportunity for sensitive and appropriate housing growth. that is proportionate to their existing size. The primary focus for this housing will be in those settlements highlighted in Figure 4.20. these villages that in the context of the rural HMA within which they are set and function are the most locally sustainable to accommodate new development (Figure 4.20). In the remaining, often typically smaller settlements villages of each HMA, as set out in Figure 4.21 proportional housing growth will be restricted to smaller market housing (or affordable housing) which meets the needs of people with local connections, whom would not otherwise be able to live in their area (Figure 4.21). particular attention will be given to ensure that housing developments should respect the scale, form, layout, character and setting of the settlement concerned. By virtue of their size and character many of these settlements do not have a traditional village or nuclear centre and in many cases have a dispersed settlement pattern which would need to be respected in the design of new housing proposals. This will ensure the delivery of schemes that are locally distinctive.</p>
	4.8.14	<p>Therefore, the target provides individual communities with a starting objective which they should aim to meet or potentially exceed over the plan period in a locally determined manner and depending on their particular aspirations. The environmental and infrastructure constraints of an area will be significant in shaping a Neighbourhood Development Plan (and other Development Plan Documents). With regard to infrastructure, Neighbourhood Development Plans will particularly need to consider the capacity of the drainage network in their area and the impact of future development on water quality in accordance with Policy SD4.</p>
	RA1	<p>Policy RA1 – Rural housing distribution strategy</p> <p>In Herefordshire’s rural areas around a minimum of 5,300 new dwellings will be provided between 2011 and 2031 to help meet contribute to the county’s housing needs. with the development of affordable housing being a priority. The development of rural housing will contribute towards the wider regeneration of the rural economy. will be promoted and supported, and the unique local environment will be protected and, where appropriate, enhanced.</p> <p>New dwellings will be broadly distributed across the county’s rural areas on the basis of seven 7 Housing Markets Areas (HMA)s – as illustrated in Figure 4.18) This acknowledgedgesing that different areas of Herefordshire have different future housing needs and requirements. Proportionate to rural HMA characteristics and reflective of future housing needs and requirements within each area, a growth target (%) will assist to inform the level of housing development within the villages identified in each HMA. All Neighbourhood Development Plans shall aim to provide levels of housing to meet these targets in a locally focused way.</p> <p>The 5,300 dwellings will be delivered throughout the rural HMAs as set out in the table below. The indicative housing growth targets in each of</p>

Ref No	Policy/ Para/ Figure	Proposed Main Modification																											
		<p>the rural HMAs will be used as a basis for the production of neighbourhood development plans in the county. Local evidence and environmental factors will determine the appropriate scale of development.</p> <table border="1" data-bbox="325 734 1018 1827"> <thead> <tr> <th>Rural HMA</th> <th>Approximate number of dwellings 2011 - 2031</th> <th>Indicative housing growth target for the villages (%)[*]</th> </tr> </thead> <tbody> <tr> <td>Bromyard</td> <td>364</td> <td>15</td> </tr> <tr> <td>Golden Valley</td> <td>304</td> <td>12</td> </tr> <tr> <td>Hereford</td> <td>1870</td> <td>18</td> </tr> <tr> <td>Kington</td> <td>317</td> <td>12</td> </tr> <tr> <td>Ledbury</td> <td>565</td> <td>14</td> </tr> <tr> <td>Leominster</td> <td>730</td> <td>14</td> </tr> <tr> <td>Ross on Wye</td> <td>1150</td> <td>14</td> </tr> <tr> <td></td> <td>5300</td> <td></td> </tr> </tbody> </table> <p>[*]Targets for villages are indicative and provided as a starting point for work on Neighbourhood Development Plans or other Development Plan Documents. Local evidence will determine the scale of development which may fall above or below the indicative target.</p> <p>As set out earlier in this section, each rural HMA was evaluated through combining the application of a localised benchmark (median village settlement size in each rural HMA), together with an assessment of services. This dual analysis targets development at locally significant villages which act as a focus for the wider community through the presence of existing services and facilities that can include schools, shops, public houses and businesses. It also <u>This approach will enable these villages with a sizeable population basis (in the context of the HMA) and potential to evolve to become more sustainable to be included. Across many areas of all rural HMAs, communities experience</u></p>	Rural HMA	Approximate number of dwellings 2011 - 2031	Indicative housing growth target for the villages (%) [*]	Bromyard	364	15	Golden Valley	304	12	Hereford	1870	18	Kington	317	12	Ledbury	565	14	Leominster	730	14	Ross on Wye	1150	14		5300	
Rural HMA	Approximate number of dwellings 2011 - 2031	Indicative housing growth target for the villages (%) [*]																											
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	5300																												
MM037.	4.8.18																												

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		<p>difficulty in accessing services and parishes understand not only the need to support current services and facilities, but to enhance their provision. all settlements in the rural areas to accommodate appropriate and environmentally sensitive sustainable housing development in accordance with the National Planning Policy Framework. A number of villages have a sizeable population basis but limited services. By enabling some housing growth within these communities, facilities become more viable and identified needs and community aspirations are more likely to be realised.</p>
4.8.19		<p>A total of 119 villages One hundred and nineteen settlements have been identified across the county all HMAs to be the main focus of proportionate housing development in Herefordshire's the rural areas. and t These are listed in Figure 4.20. Within these villages settlements carefully considered development which is proportionate to the size of the community and its needs will be permitted. only where residential proposals are locally appropriate to ensure villages retain their separate, distinctive and varied characters.</p>
4.8.20		<p>Residential development will be located within or adjacent to the main built up area(s) of the village settlement (with priority being given to the development of suitable and available brownfield sites) to guard against. This will ensure that unnecessary linear, detached or surrounding countryside— isolated, non-characteristic and discordant dwellings do not arise in the surrounding countryside which would adversely damage affect the character and setting of a village settlement and its local environment. Development of locally defined sensitive sites will not be acceptable.</p>
4.8.22		<p>Residential development will be expected to contribute to the future housing needs of each HMA by providing an appropriate mix of dwelling types and sizes having regard to the Local Housing Market Assessment and other relevant evidence sources... Developments should be sensitively and inclusively designed to reflect the lifelong housing needs of the local community contributing. They should also contribute, where appropriate to the provision of much needed infrastructure, affordable homes and improving community cohesion.</p>
4.8.25		<p>Therefore, in the villages identified in Figure 4.21, proportional levels of housing will be focused on providing smaller market homes which meet the needs of people with local connections, who would not otherwise be able to afford a house to live in their local area. In addition, proposals for affordable housing in line with criteria 1 to 4 of Policy H2 will be supported in these villages. It is important that these housing schemes should be needs led, the starting point being a need for a house or housing in a particular village, rather than the availability of a particular site. On this basis, housing proposals will be expected to reflect the range that is required in the settlement concerned. In relation to proposals that seek specifically to meet identified local housing needs, those proposed developments must be based on appropriate, compelling evidence of how the proposal meets that need. the identified local housing need, all of which must be clearly demonstrated to the satisfaction of Herefordshire Council. A planning obligation will restrict the occupation of dwellings on this basis to ensure their long term availability for those with local housing needs'.</p>
4.8.26		<p>Smaller houses, predominantly two and three bedroom properties, continue to be required across all rural areas. To address this need and</p>

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		<p>ensure that house values remain at the lower end of the house price range in the area, the size of any new dwelling and plot size will be restricted for those villages in Figure 4.21. Dwelling size is the net internal floor area, measured from internal wall finish to internal wall finish of the unit, with no space or rooms discounted. The size of any one dwelling will be limited to a maximum net internal floor space of 80sq.m in a case of a one or two bedroom house, 90sq.m for a three bedroom house and 100sq.m in the case of a four bedroom house. These figures are based on the internal floorspace allowances made by registered providers when applying to the Homes and Communities Agency for funding utilising their Housing Quality Indicators system. In the event that medical needs necessitate the provision of specific facilities, any resulting additional floor area requirements shall be justified on a case-by-case basis through the submission of a needs appraisal that includes evidence from a medical professional. Permitted development rights will also be removed to limit the enlargement of such developments, with a consequent increase in value and price.</p> <p><u>A proactive approach has been taken to neighbourhood planning within the county. At February 2015, there are 88 designated neighbourhood areas in the county and significant progress is being made in the production of neighbourhood development plans. These plans will be the principal mechanism by which new rural housing will be identified, allocated and managed. The proportional growth target within policy RA1 will provide the basis for the minimum level of new housing that will be accommodated in each neighbourhood plan. The target represents a level of growth for settlements, as a percentage, that is proportionate to existing HMA characteristics. For individual settlements in each HMA, this will be reflected as a percentage of the total number of dwellings in the parish concerned. In parishes which have more than one settlement listed in Figure 4.20 and 4.21 the relevant neighbourhood development plan will have appropriate flexibility to apportion the minimum housing requirement between the settlements concerned. This will allow for a locally flexible approach that will respect settlement characteristics, the distribution of local facilities and other local factors. This approach will accord with paragraph 55 of the NPPF which indicates that where there are groups of smaller settlements in rural areas, the development in one location may support services in a location nearby. The adoption of this approach will allow distinctive solutions which reflect the varied geographies in the county.</u></p>
	RA2	<p>Policy RA2 – Herefordshire’s villages Housing in settlements outside Hereford and the market towns.</p> <p><u>To maintain and strengthen a network of locally sustainable communities across the rural parts of Herefordshire, there will be opportunities for sustainable housing growth will be supported in those villages settlements identified in Figures 4.20 and 4.21. This will enable development that has the ability to best able to support development, bolstering existing service provision, improving facilities and infrastructure and meeting the needs of their communities concerned.</u></p> <p><u>The growth target for the villages (%) of each rural HMA will assist to inform the level of housing development in the villages identified in Figures 4.20 and 4.21. All Neighbourhood Development Plans shall aim to provide levels of housing to proportionally meet these targets in a</u></p>

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		<p>locally focused way.</p> <p>The minimum growth target in each rural Housing Market Area will be used to inform the level of housing development to be delivered in the various settlements set out in Figures 4.20 and 4.21. Neighbourhood Development Plans will allocate land for new housing or otherwise demonstrate delivery to provide levels of housing to meet the various targets.</p> <p>Housing growth will vary between the villages identified in a proportionate manner and will be permitted only where the residential development proposal is considered to be locally appropriate by:</p> <ol style="list-style-type: none"> 1- ensuring the proposal reflects the size, role and function of each village and is located within or adjacent to the main built up area(s) of the village so as to not result in free standing, individual or small groups of dwellings which are obviously detached from, or peripheral to, the main built up area(s); 2- giving priority to the development of suitable brownfield sites; 3- being of a high quality sustainable design which is appropriate to its context and makes a positive contribution to the surrounding environment and rural landscape; 4- contributing to the delivery of an appropriate mix of dwelling types and sizes, including affordable housing, to meet the housing needs of all sectors of the community; and 5- where there is no Neighbourhood Development Plan, by undertaking community consultation. <p>Housing proposals will be permitted where the following criteria are met:</p> <ol style="list-style-type: none"> 1. Their design and layout should reflect the size, role and function of each settlement and be located within or adjacent to the main built up area. In relation to smaller settlements identified in fig 4.21 proposals will be expected to demonstrate particular attention to the form, layout, character and setting of the site and its location in that settlement; and/or they result in development that contributes to or is essential to the social well-being of the settlement concerned; 2. Their locations make best and full use of suitable brownfield sites wherever possible; 3. They result in the development of high quality, sustainable schemes which are appropriate to their context and make a positive contribution to the surrounding environment and its landscape setting; and 4. They result in the delivery of schemes that generate the size, type, tenure and range of housing that is required in particular settlement, reflecting local demand. <p>Specific proposals for the delivery of local need housing will be particularly supported where they meet an identified need and their long-term retention as local needs housing is secured as such.</p> <p>In the villages identified in Figure 4.21 proportional residential growth will be limited to the provision of smaller market housing, where the</p>

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		<p>residential development proposal satisfies criteria 1-5 above; and:</p> <p>6. through the submission of appropriate evidence to demonstrate the development meets an identified local housing need. Residential development will be considered to contribute towards meeting an identified need, where it will provide accommodation for any of the following:</p> <ul style="list-style-type: none"> • Existing residents of the parish requiring separate accommodation; • Persons who have current and long standing family links (immediate family only e.g. parent, sibling or adult child) with the parish; • Grandparents, grandchildren, aunts or uncles will be included only where the council considers it necessary for the applicant to be accommodated within the Parish in order to provide or receive medical or social support to or from a relative; • Persons with permanent, full time employment based mainly within the parish. <p>7. the dwelling size is limited to a net internal floor area of 80sq.m (1 or 2 bedroom house) or 90sq.m (3 bedroom house) or 100sq.m (4 bedroom house). Only where medical needs necessitate the provision of specific facilities will any resulting additional floor space requirements be considered; and</p> <p>8. the plot size is limited to a maximum area of 350sq.m unless site characteristics or configuration render this impractical.</p> <p>Permission granted in these cases will be subject to planning obligations that safeguard occupation of the development for identified local housing needs and will continue to do so in perpetuity. To achieve this policy, planning permissions will be subject to a condition removing permitted development rights for the erection of any extension or detached buildings within the curtilage and a condition restricting the conversion of an ancillary garage in to habitable accommodation. Applications for such developments in variation of these conditions will only be approved in exceptional circumstances.</p> <p>Proposals for affordable housing in the villages identified in Figure 4.21 will also be supported where the development is in line with criteria 1 to 4 of Policy H2.</p>
MIM038.	4.8.28	<p>The settlement boundaries for those places villages detailed listed in Policy RA2 will be defined in either neighbourhood development plans or the Rural Areas Site Allocation DPD. Outside of the villages these settlements new housing will be restricted strictly controlled to avoid unsustainable patterns of development. Isolated development in the countryside will not be permitted in order to protect the landscape and wider environment. In the period leading up to the definition of appropriate settlement boundaries the Council will assess any applications for residential developments in Figure 4.20 and 4.21 against their relationship to the main built up form of the settlement. Residential</p>

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		development will therefore be limited to those proposals which meet the criteria listed in Policy RA3. Proposals should seek to make use of existing buildings through conversion and adaption in preference to new development. This approach accords with Paragraph 55 of the NPPF. Proposals should be sited within or adjoining a settlement and seek to make use of existing buildings through conversion and adaption in preference to new development.
	RA3	<p>Policy RA3 – Herefordshire’s countryside</p> <p>In rural locations outside of settlements, as to be defined in either neighbourhood development plans or the rural areas site allocations DPD, away from Herefordshire’s villages, residential development will be limited to proposals which satisfy one or more of the following criteria:</p> <ol style="list-style-type: none"> 1. meets an agricultural or forestry need or other farm diversification enterprise for a worker to live permanently at or near their place of work and complies with Policy RA4; or 2. accompanies and is necessary to the establishment or growth of a rural enterprise, and complies with Policy RA4; or 3. involves the replacement of an existing dwelling (with a lawful residential use) that is comparable in size and scale with, and is located in the lawful domestic curtilage, of the existing dwelling; or 4. would result in the sustainable re-use of a redundant or disused building(s) where it complies with Policy RA5; or and leads to an <u>enhancement of its immediate setting</u>; or 5. is rural exception housing in accordance with Policy H2; or 6. is of exceptional quality and innovative design satisfying the design criteria set out in Paragraph 55 of the National Planning Policy Framework and achieves sustainable standards of design and construction; or 7. is a site providing for the needs of gypsies or other travellers in accordance with Policy H4.
	4.8.29	<p>Occupancy controls will be applied to dwellings arising from the expansion of rural business enterprises, as well as to agricultural and forestry dwellings (Policy RA4). To make the stock of occupational dwellings more flexible than in the past and respond to local housing needs, the occupation of such dwellings and will be secured from the start by a Section 106 Agreement that also encompasses local housing needs. As such, in the event that there is no longer a functional requirement either from the original rural business or from other rural enterprises in the locality, the dwelling will default to local housing needs rather than being lost from the stock of smaller affordably priced rural housing.</p>
	4.8.30	<p>Replacement dwellings will only be permitted provided that the existing building has established and continuing residential use rights and has not been abandoned. Proposals should ordinarily be sited in the same a similar position as the original dwelling unless there is technical justification to consider an alternative location within the existing lawful domestic curtilage. To safeguard the character and appearance of the rural landscape from the visual impact of large buildings, the size of any replacement dwelling will be of a comparable total cubic volume</p>

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MM039.	RA4	<p>(measured externally) to the existing dwelling. To minimise the impact of the proposal on the surrounding area, the design of the dwelling and any associated development should respect the local character of the area and/or make a positive contribution to the rural landscape. As such the mass, scale, height and external appearance of the resultant development should be taken into account. Permitted development rights will generally be removed from replacement dwellings located in the countryside.</p> <p>Policy RA4 – Agricultural, forestry and rural enterprise dwellings</p> <p>Proposals for dwellings associated with agriculture, forestry and rural enterprises arising under Policy RA3 will only be permitted where it can be demonstrated that there is a sustained essential functional need for the dwelling and it forms an essential part of a financially sustainable business, and that such need cannot be met in existing accommodation. Such dwellings should:</p> <ol style="list-style-type: none"> 1. demonstrate that the accommodation could not be provided in an existing building(s); 2. be sited so as to meet the identified functional need within the unit or in relation to other dwellings; 3. be of a high quality, sustainable design which is appropriate to the context and makes a positive contribution to the surrounding environment and rural landscape; and 4. should be of a size no greater than a net internal floor area of 100 sq.m, only utilising the additional 20% allowance where the nature and needs of the enterprise require and can be justified. <p>Where evidence of the economic sustainability of the rural enterprise is not proven or where an enterprise is not yet established, planning permission for temporary accommodation may be granted for a maximum period of three years to enable the sustainability of the enterprise to be assessed. Successive extensions will not normally be granted. Temporary accommodation should be carefully sited within the unit or in relation to other dwellings.</p> <p>Dwellings permitted in accordance with this policy will be subject to occupancy controls (encompassing local housing needs occupancy set out in Policy RA2 as a default) secured through a Section 106 Agreement. In some situations it will be appropriate to use legal agreements to tie other dwellings to the unit and/or restrict the occupancy of other dwellings within the farm/business unit. In appropriate circumstances legal agreements may be used to tie a rural enterprise dwelling to adjoining buildings and land to prevent them being sold separately.</p> <p>Applications for the removal of occupancy conditions (or section 106 Agreements) which pre-date adoption of the Core Strategy will only be permitted where it can be demonstrated the dwelling is surplus to the current and sustained original business needs, as well as other rural enterprises in the locality and there has been a genuine and unsuccessful attempt to market the property at a realistic price (for rent or sale) which has been independently verified.</p>
	4.8.35	<p>All applications will be required to demonstrate that a dwelling at the enterprise is essential by showing a functional need for the occupier to be present at the business for the majority of the time. Therefore, full supporting information appraising the need, including a functional</p>

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		<p>assessment, prepared by an appropriate and qualified person should accompany all applications. Any functional need established can only be sustained where it is an essential part of an economically sustainable enterprise. Financial information as to the economic sustainability of the enterprise in the form of accounts and which gives further evidence of the need should also be submitted to support all applications. Businesses should have been established for at least three years, have been profitable for at least one year, be currently financially sound and have a clear prospect of remaining sustainable. The supporting information should also clearly demonstrate why existing accommodation in the locality, either on the farm or within existing settlements, is unsuitable or unavailable, and explore any other means of meeting the need.</p>
4.8.37		<p>Amend first two sentences: To avoid a proliferation of dwellings in the countryside, occupancy controls (encompassing local housing needs as introduced in RA2) will be secured through Section 106 Agreements attached to dwellings advanced through this policy. This is to ensure if the dwelling concerned is no longer required by the original business, it is firstly kept available to meet the essential needs of rural enterprises in the locality, subsequently defaulting to local housing needs. Where a second dwelling is necessary for the essential management of a rural enterprise, the council will restrict the occupation/separate sale of any existing dwellings on the holding which are in the ownership or control of the applicant or their registered business/partners. Similarly, where appropriate, planning obligations may be used to prevent the future separation of a farmhouse(s) from any adjoining farm buildings and land. These measures may be taken to ensure that new proposals for additional dwellings do not allow existing farm dwellings to be removed from the rural worker housing stock, protect the countryside against the pressure for new homes and to prevent the original justification for the additional dwelling being undermined.”</p>
4.8.38		<p>Where the need for a dwelling is established on the basis of proven essential need, preference should be given to the use of suitable existing buildings through conversion. Where this is not possible, any new development should relate closely to the activities for which there is a need. In most cases this will mean that the new dwelling should be sited in close proximity to existing buildings. Isolated locations or locations that could encourage farm fragmentation in the case of dwellings for agricultural enterprises should be avoided and an underlying regard to potential future occupancy on the basis of local housing needs should be considered. The location and siting of temporary accommodation will itself be considered on the basis of permanent accommodation being provided. Where other development relating to the enterprise is being proposed at the same time as part of an overall scheme, siting of all development will be considered on a comprehensive basis.</p>
4.8.39		<p>Taking into account the need of many rural workers for a property that is affordable, together with the introduced default to local housing needs occupancy, proposals for rural worker dwellings should aim to be a size of no greater than a net internal floor area (measured from wall finish to wall finish of the unit) of 100sq.m. This is for consistency with local housing needs criteria set out in Policy RA2 that is based upon allowances made by registered providers when applying to the Homes and Communities Agency for funding. Notwithstanding this, depending upon the nature of the enterprise with which the dwelling is associated, additional floor space needs may exist, including for a wet room or farm office. An allowance of up to a further 20% (20sq.m) may be utilised where such needs can be justified. Permitted development rights for</p>

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	4.8.40	<p>dwellings approved under this policy will be removed</p> <p>Where applications are made to remove occupancy conditions (or obligations) on dwellings when an essential on-site worker is no longer required that pre-date the default to local needs housing introduced by the Core Strategy, applications will be required to demonstrate that the condition is no longer appropriate. Accordingly applicants should demonstrate there is no functional need and thus the dwelling is surplus to both the current and sustainable needs of the original rural enterprise, as well as other rural enterprises in the locality. Evidence should be provided that genuine attempts have been made to market the property for <u>sale or rent</u> at a realistic price that reflects its occupancy restriction for a period of at least 12 months. The council will require the marketing price to be independently verified by the District Valuer prior to the commencement of marketing.</p>
	4.8.41	<p>For those dwellings approved under the application of this policy, first and foremost the dwelling should continue to provide accommodation on the basis it was approved so not to readily diminish the stock of lower priced accommodation available to essential rural workers, particularly the farming community. Where there is no longer a functional requirement from the original business or other rural enterprises, evidence will be required to be submitted to demonstrate compliance with identified local housing needs criteria (Policy RA2) and thus satisfy clauses set out in the Section 106 Agreement before occupation of the dwelling on a local needs basis can lawfully commence.</p>
MM040.	4.8.42	<p>Recent changes to planning legislation mean that in certain circumstances permitted development rights will allow the change of use of agricultural buildings to residential or to specified education facilities subject to prior approval. Policy RA5 applies to proposals for re-use of rural buildings that are not covered by this new legislation and that will require planning permission. It recognises that the re-use of existing rural buildings has an important role to play in promoting economic prosperity and sustainable development in rural areas. through the Such proposals can result in the creation of local accessible jobs, the provision of providing premises for business start-ups and/or expansions, improving business networks and supporting farming through diversification schemes. The re-use of buildings can also provide environmental benefits by making use of existing resources and at the same time conserving buildings of heritage value. Redundant rural buildings are often located away from villages in locations that are considered to be unsuitable for residential development. Therefore this policy, where planning permission is required, seeks to encourage re-use for residential uses in villages in line with Core Strategy unless certain criteria are met which would allow it to take place away from the villages. Evidence will be required to demonstrate that the building is no longer required for its former use!</p>
	RA5	<p>Policy RA5 – Re-use of rural buildings</p> <p>The sustainable re-use of individual and groups of redundant or disused buildings, including farmsteads in rural areas, which will make a positive contribution to rural businesses and enterprise and support the local economy (including live work units), <u>or which otherwise contributes to or is essential to the social well being of the countryside</u>, will be permitted where:</p> <ol style="list-style-type: none"> 1. design proposals respect the character and significance of any redundant or disused building and demonstrate that it represents the most viable option for the long term conservation and enhancement of any heritage asset affected, together with its setting;

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		<p>2. design proposals make adequate provision for protected and priority species and associated habitats;</p> <p>3. the proposal is compatible with neighbouring uses, including any continued agricultural operations and does not cause undue environmental impacts and;</p> <p>4. the buildings are of permanent and substantial construction capable of conversion without major or complete reconstruction; and</p> <p>5. the building is capable of accommodating the proposed new use without the need for substantial alteration or extension, ancillary buildings, areas of hard standing or development which individually or taken together would adversely affect the character or appearance of the building or have a detrimental impact on its surroundings and landscape setting.</p> <p>The sustainable re-use of rural buildings for residential use in villages identified in Policy RA2 will be permitted where the application meets the requirements of criteria 1-5. In rural locations away from villages, proposals for the re-use of buildings for residential use will only be permitted where the proposal meets the criteria 1-5 listed above and</p> <p>a) it is in accordance with Policy RA4 regarding rural workers; or</p> <p>b) where the redundant building is a heritage asset and the applicant has demonstrated that other non-residential uses are not viable; or</p> <p>c) it will result in an enhancement of the building(s) and immediate setting where their current appearance detracts from local amenity and/or quality of the local environment.</p> <p>Any planning permissions granted pursuant to the policy will be subject to a condition removing permitted development rights for future alterations, extensions and other developments</p>
MM041.	RA6	<p>Policy RA6 - Rural economy</p> <p>Employment generating proposals which help diversify the rural economy in rural areas such as knowledge based creative industries, environmental technologies, business diversification projects and home working will be supported. where they are of an appropriate scale for their location, accessible by a choice of transport modes and of a form which protects and respects the environmental and landscape quality. A range of economic activities will be supported, including proposals which:</p> <ul style="list-style-type: none"> • support and strengthen local food and drink production in appropriate locations; • support and/or protect the vitality and viability of commercial facilities of an appropriate type and scale in rural areas, such as village shops, petrol filling stations, garden centres and public houses; • involve the small scale expansion of existing businesses in rural areas in appropriate locations; • promote sustainable tourism proposals of an appropriate scale in accordance with Policy E4 - Tourism;

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		<ul style="list-style-type: none"> ● <u>recognise that there are economic benefits of utilising Herefordshire's natural and historic environment as an asset to be valued, conserved and enhanced promote the sustainable use of the natural and historic environment as an asset which is valued and conserved;</u> ● <u>support the retention of existing military sites to remain viable;</u> ● <u>support the retention and/ or diversification of existing agricultural businesses</u> <p><u>Planning applications which are submitted in order to diversify the rural economy will be permitted where they:</u></p> <ul style="list-style-type: none"> ● <u>where possible, involve the change of use and redevelopment of existing redundant buildings in accordance with Policy RA5 – Re-use of rural buildings. The redevelopment of isolated brownfield sites which no longer have existing buildings will not be supported</u> ● <u>ensure that the development is of a scale which would be commensurate with its location and setting not threaten the vitality and viability of a nearby centre;</u> ● <u>are of an appropriate scale and/or use which does not cause unacceptable adverse impacts to the amenity of nearby residents by virtue of design and mass, noise, dust, lighting and smell;</u> ● <u>ensure that traffic generated do not generate traffic movements that cannot be safely accommodated safely within the local road network, and does not result in the need to widen roads or the removal of hedgerows; and</u> ● <u>ensure that development does not undermine the achievement of water quality targets in accordance with Policies SD3 and SD4.</u>
4.8.51		<p><u>It is important to help strengthen the rural economy by providing flexibility for new and expanding rural businesses subject to them being. Policy RA6 sets out a range of criteria that will need to be met to ensure that resulting developments are of an appropriate scale and location and ensuring that they do not significantly impact upon the environmental quality of the area.</u></p>
4.8.52		<p><u>Herefordshire contains The Wye Valley AONB and the Malvern Hills AONB which are recognised by the National Planning Policy Framework as areas where development should be restricted. In these designated areas, development will be restricted which has the potential to cause adverse impacts to the AONB, for example polytunnels. Guidance on proposed developments in AONBs is set out in Paragraph 116 of the NPPF. Policy LD1 of this plan also sets out guidance on how development proposals should seek to safeguard the character and appearance of these areas.</u></p>
General Policies – Social Progress		
Revisions to Policy H1 upon affordable housing policies to reflect recent changes in national policy guidance		
MM042.	H1	<p><u>All new open market housing proposals on sites of more than 10 dwellings which have a maximum combined gross floor space of more than 1000sqm above the thresholds set out below will be expected to contribute towards meeting affordable housing needs.</u></p> <p><u>Within and adjoining the urban areas of Hereford and the market towns, proposals of 15 or more dwellings of 0.5 hectares will be expected to</u></p>

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		<p>contribute to affordable housing provision. In rural areas, all new housing developments will be expected to make a contribution whereby:</p> <ul style="list-style-type: none"> i) on sites of 3 or more dwellings, the affordable housing will be expected to be provided on-site unless developers can clearly demonstrate that a financial contribution would be more appropriate; ii) on sites of 1 or 2 dwellings, developers will be required to provide a financial contribution to the provision of affordable housing off-site. <p>The amount and mix of affordable housing including those on strategic housing sites will vary depending on evidence of housing need, as identified through the latest housing market assessment and where appropriate, an assessment of the viability of the development. The following indicative targets have been established based on evidence of need and viability in the county's housing market and housing value areas:</p> <ol style="list-style-type: none"> 1. a target of 35% affordable housing provision on sites in the Hereford, Hereford Northern and Southern Hinterlands, and Kington and West Herefordshire housing value areas; 2. a target of 40% affordable housing provision on sites in the Ledbury, Ross and Rural Hinterlands; and Northern Rural housing value areas (which includes Bromyard); 3. a target of 25% affordable housing provision on sites in the Leominster housing value area. <p>Any affordable housing provided under the terms of this policy will be expected to be available in perpetuity for those in local housing need. In order to ensure an appropriate balance of affordable housing is provided, the evidence for each housing market area and housing value area will form the basis for determining the mix of tenure types on specific sites.</p>
5.1.10		<p>The findings of the <i>Local Housing Market Assessment 2013</i> (LHMA) have also been taken into account so that the resultant policies on affordable housing are locally relevant and viable. <u>The supporting evidence will be maintained by updating the housing market assessment work and viability and housing value areas on at a three yearly basis.</u></p>
	5.1.12	<p>Delete paragraph</p> <p>5.1.12 In rural areas the majority of new housing is delivered on small sites of fewer than 5 dwellings and therefore to ensure the maximum provision of new affordable housing a threshold of one house is justified. Where there are sites that are capable of delivering 3 dwellings or more, the council will expect the affordable housing to be provided on-site, unless the developer can demonstrate that the requirement for affordable housing would be better met through contributions to off-site provision. There must however be a realistic prospect that the off-site provision would meet the identified need, and come forward in a reasonable timescale. Where rural developments of one or two dwellings are</p>

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MM043.	H2	<p>proposed it is accepted that an on-site contribution may not be possible, and therefore in such a case an off-site contribution will be required. Where new dwellings are provided as part of proposals for the re-use of rural buildings, an element of affordable housing should also be provided in accordance with Policy H1.</p> <p>Policy H2 - Rural exception sites</p> <p>Proposals for small affordable housing schemes in rural areas may be permitted on land which would not normally be released for housing where:</p> <ol style="list-style-type: none"> 1. the proposal could assist in meeting a proven local need for affordable housing; and 2. the affordable housing provided is made available to, and retained in perpetuity for local people in need of affordable housing; and 3. the site respects the characteristics of its surroundings, demonstrates good design and offers reasonable access to a range of services and facilities normally in a settlement identified in Policy RA2. 4. the internal floor area of the dwellings are consistent with the size limits required by policy RA2. <p>In order to enable the delivery of affordable housing some market housing may be permitted as part of the development to subsidise a significant proportion of affordable housing provision. However, evidence will be required – by way of a financial appraisal, in order to demonstrate that the proposed scale of market housing is that required for the successful delivery of affordable housing.</p>
MM044.	H3	<p>Policy H3 – Ensuring an appropriate range and mix of housing</p> <p>Residential developments should provide a range and mix of housing units which can contribute to the creation of balanced and inclusive communities. In particular, on larger housing sites of <u>more than 50 dwellings not entirely intended to meet a specialist need</u>, developers will be expected to:</p> <ol style="list-style-type: none"> 1. provide a range of house types and sizes to meet the needs of all households, including younger single people; 2. provide housing capable of being adapted for people in the community with additional needs; and 3. provide housing capable of meeting the specific needs of the elderly population by: <ul style="list-style-type: none"> - providing specialist accommodation for older people in suitable locations; - ensuring that non-specialist new housing is built to take account of the changing needs of an ageing population; - ensuring that developments contain a range of house types, including where appropriate, bungalow accommodation. <p>The latest Local Housing Market Assessment will provide evidence of the need for an appropriate mix and range of housing types and sizes.</p>
MM045.	3.39	<p>Amend paragraph to read:</p> <p><u>The Gypsy and Travellers and Travelling Showperson Accommodation Assessment, 2015 The Gypsy and Travellers Assessment 2013</u> highlighted a need for further permanent pitches in the county. A <u>Travellers’ Sites separate Development Plan</u> Document will be prepared following on from the Core Strategy to allocate pitches, but in the meantime an interim policy is set out in the policies on social progress in the General Policies section of this document.</p>

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	H4	<p>Delete first paragraph and amend remaining policy to read:</p> <p>Policy H4 – Traveller Sites</p> <p>Herefordshire Council will provide for the site needs of travellers through the preparation of a Travellers' Development Plan Document (DPD), which will include site allocations. Sites for at least 31 new residential pitches for gypsies and travellers will be provided by 2017, with the target for the remainder of the period up to 2027 being established in the Traveller DPD. The 2017 target will be in addition to maintaining provision for the current level of long term unauthorised sites either through their retention where they comply generally with the criteria listed below or through the release of additional sites where such unauthorised sites are no longer available.</p> <p><u>The accommodation needs of travellers will be provided for through the preparation of a Travellers' Sites Document (DPD), which will include site specific allocations.</u></p> <p>In the absence of an adopted DPD, or where proposals for sites are brought forward on non-allocated land supported by evidence that they meet a local need, proposals will be permitted supported where:</p> <ol style="list-style-type: none"> 1. sites afford reasonable access to services and facilities, including health and schools, in particular avoiding long distance travel; 2. adequate appropriate screening and landscaping is included within the proposal in order to ensure that the proposal does not result in an adverse effect upon the character and amenity of the landscape, historic assets and/or neighbouring properties; to protect local amenity and the environment 3. they promote peaceful and integrated co-existence between the site and the local community 4. in the case of proposals for they enable mixed business and residential accommodation (providing for the live-work lifestyle of travellers), local amenity is not adversely affected; 5. the number of pitches at any location should not overload local infrastructure; they avoid undue pressure on local infrastructure and services 6. in rural areas, the size of the site should reflect surrounding population size and density so that sites do not dominate nearby settled communities; and 7. they are capable of accommodating on-site facilities that meet best practice for modern traveller site requirements, including play areas, storage, provision for recycling and waste management, and where necessary, work areas. <p>In rural areas, where there is a case of local need for an affordable traveller site, but criterion 1 above cannot be fulfilled, then an exception may be made and proposals permitted, provided such sites can be retained for that purpose in perpetuity.</p>
	5.1.24	<p><u>The Traveller Development Plan Travellers' Sites Document which is programmed in the Council's Local Development Scheme(2015), for adoption in spring 2016, will include the following:</u></p> <ul style="list-style-type: none"> • provision of residential sites for at least 31 new pitches for gypsies and travellers' by 2017, and establish a longer term target for the period up to 2027 and beyond if possible;

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		<ul style="list-style-type: none"> ● identification of broad locations for further developable residential sites for 'gypsies and travellers' over the periods 2017-2031; ● identification of need for, and approach to, the provision of transit sites; ● consideration of the need for some provision for travelling show people within the county, with the location of plots being judged against the criteria in policy H4 above; ● an urgent re-assessment of current need with an indication of the process for updating need on a regular basis; ● an increased provision of private sites during the plan period; ● an assessment of current need for permanent residential pitches with an indication of the process for updating need on a regular basis; ● pitch targets for travellers; ● deliverable sites for residential pitches for the period 2014-19 to set against targets; ● identification of broad locations for further developable residential sites for travellers over the period 2019-2031; ● identification of need for, and approach to, the provision of transit sites for the plan period; ● consideration of the need for, and approach to, provision for travelling showpersons within the county for the plan period; ● consideration of the need for a rural exceptions policy to enable sites to be brought forward solely as affordable gypsy and traveller sites; and ● consideration of support for the authorisation of long-term unofficial sites where they meet the criteria in policy H4 above or the making available of alternative provision where they are lost for whatever reason.
5.1.25		<p>Herefordshire Council's <i>Draft Herefordshire Gypsy and Traveller Accommodation Assessment 2013</i> identifies a total minimum requirement of 31 residential pitches by 2020. This target is in addition to the extent of long-term unofficial sites. A pitch is defined as the 'area of land on a gypsy and traveller caravan site developed for a single family'. A plot means a pitch on a "travelling showpeople" site (often called a "yard"). This terminology differentiates between residential pitches for "gypsies and travellers" and mixed-use plots for "travelling showpeople", which may/will need to incorporate space or to be split to allow for the storage of equipment. Studies for the preparation of the Traveller Development Plan Document should look at the possibility of estimating levels of need for pitches for the periods 2017-2031. Estimates of need beyond 2017 cannot be forecast with sufficient accuracy and will need to be identified in subsequent reviews after the Development Plan Document has been prepared.</p>
5.1.26		<p>Currently some 101 114 authorised residential pitches are available within Herefordshire with a further 27-21 pitches on unauthorised, but tolerated sites. Numbers of caravans on these sites have fluctuated over the past two years from 148 to 161 and averaging 157. Some pitches accommodate more than one caravan. A Traveller Development Plan Document will set out the approach to identifying sites and the number of pitches at each location. This will look at matters in detail for the period up to 2017 and it is likely that broad locations for estimates of need beyond this period will be identified. Prior to the adoption of a Development Plan Document, Policy H4</p>

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		will be used as an interim policy to direct development.
5.1.27		Delete first sentence and amend paragraph to read: In the immediate term Herefordshire Council will provide 8 additional pitches by bringing back into use pitches at its site in Bromyard. The private sector may need to provide for further residential site needs until the Development Plan Travellers' Sites Document is adopted in 2016 and policy H4 sets out the basis upon which planning permission will be granted during this period. The criteria in this policy may also apply when the defined need for residential gypsy and traveller sites has been met, yet further need is accepted.
5.1.28		In assessing whether evidence of a local need exists, the categories set out in policy RA2 will be applied. In addition, and in the same way that a rural exception policy is applied to housing development, rural exception sites can also be applied to affordable traveller sites and the Travellers' Sites Document will consider this issue. A rural exception site policy enables small sites to be used, specifically for affordable traveller sites in perpetuity, in small rural communities, that would not normally be used for traveller sites.
5.1.29		Amend paragraph to read: Although currently there is no The assessment of need for transit sites or plots for travelling show people this will be reviewed as part of the work for the Travellers' Sites Development Plan Document. Should any need arise in the interim; proposals will need to satisfy the criteria set out in Policy H4.
5.1.30		In bringing proposals forward it will be important to ensure that sites are appropriately landscaped in order to limit their visual impact and should provide access to local facilities and services such as shops, and schools and healthcare. Small sites accommodating pitches for individual or extended families are generally more unobtrusive, easier to manage and are less likely to be of a scale which would dominate local communities. It is also important to recognise that provision is included to meet the live-work nature of gypsies and travellers and adequate provision is made for play space for children.
MM046.	SC1	Policy SC1 – Social and community facilities Development proposals which protect, retain or enhance existing social and community infrastructure or ensure that new facilities are available as locally as possible will be supported. Such proposals should be in or close to settlements, have considered the potential for co-location of facilities and where possible be safely accessible by foot, by cycle and public transport. New development that creates a need for additional social and community facilities (for example, schools, pre-schools, children's centres, child minding provision, youth provision, pubs and local shops) – that cannot be met through existing social facilities – will be expected to meet the

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		<p>additional requirements through new, or extension of existing, provision or by developer contributions <u>which meet the relevant tests of paragraph 204 of the NPPF where appropriate.</u></p> <p>Proposals involving the provision or expansion of social and community facilities will be expected to provide publicly accessible toilets (including facilities for disabled people and baby changing).</p> <p>Existing facilities will be retained, unless it can be demonstrated that an appropriate alternative facility is available, or can be provided to meet the needs of the community affected; or it can be shown that the facility is no longer required, viable or is no longer fit for purpose; and where appropriate, it has been vacant and marketed for community use without success. Viable alternative facilities must be equivalent to those they replace, in terms of size, quality and accessibility.</p> <p>The provision or improvement of higher education facilities and the continuing enhancement of existing, or provision of new, training and skills facilities will be actively promoted.</p>
	5.1.37	<p>Local retail premises, village halls, churches and public houses, particularly in the rural areas are often at the heart of the community and provide a place for the local community to meet, to use function rooms, to socialise and to fulfil the day to day convenience needs of the local community. In some locations it is becoming increasingly difficult to retain services, shops and public houses; however it is essential that support is given to enable businesses to continue to serve the local community. In such cases, flexibility should be given to enable local shops, services or public houses to diversify into ancillary retail and tourism opportunities or community ownership through the 'Community Right to Bid' process. This flexibility may enable the business to continue to serve the local community. Where a business is shown to be no longer viable, the first alternative should be to investigate whether an alternative community use is possible. <u>In order to demonstrate that alternative community uses have been considered, evidence of marketing for a period of at least 12 months should be provided with any proposals involving the loss of community facilities</u></p>
MM047.	OS1	<p>Policy OS1 - Requirement for open space, sports and recreation facilities</p> <p>The provision of appropriate open space, sports and recreation facilities will arise in the following proposals for planning applications:</p> <ol style="list-style-type: none"> 1. all new residential dwellings; or 2. retail and employment proposals of greater than 1000 square metres of floor space or the equivalent of 15 or more full-time employees; <u>where there is need to provide informal areas of amenity greenspace for the use of employees and visitors;</u> and 3. residential institutions, student accommodation, assembly and leisure, hotels or hostels.

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	5.1.47	<p>For applicable employment and/or retail proposals, formal open space, sports and recreation facilities (see Glossary) will not be required. However appropriate on-site provision of at least 5% of the total site area for informal areas of amenity greenspace is required for the use of employees and visitors for breaks, and will need to be properly maintained by the owner/managing company for the site. Informal areas of amenity greenspace may be required for the use of employees and visitors for breaks, and will be assessed on a site by site basis. If there is a nearby open space within safe walking distance which would cater for the needs of the employees, a contribution of the equivalent cost of providing the on-site area as identified above to improve existing off-site provision, may also be considered. Users of residential institutions e.g. care homes will also require the provision of on-site amenity greenspace, particularly where the facility hosts families and children. For residential accommodation providing for the needs of people with severe mobility impairments, a reduction of required provision will need to be provided (on a pro-rata basis) according to the needs of the residents using the accommodation</p>
MM048.	OS2	<p>Policy OS2 – Meeting open space, sports and recreation needs</p> <p>In order to meet the needs of the community, provision for open space, sports and recreation facilities will be sought, where appropriate, taking into account the following principles:</p> <ol style="list-style-type: none"> any new development must be in accordance with all applicable set standards of quantity, quality and accessibility as defined in the companion guide to PPG17 or any successor document; and provision of open space, sports and recreation facilities should be located on-site unless an off-site or partial off-site contribution would result in an equally beneficial enhancement to an existing open space, sports and/or recreation facility which is of benefit to the local community. <p>Proposals for major sports or leisure facilities, which meet an identified regional or sub-regional need, should be located within or on the edge of Hereford. Where no suitable site is available on the edge of Hereford, the urban areas of market towns may also be considered.</p>
MM049.	MT1	<p>Policy MT1 – Traffic management, highway safety and promoting active travel</p> <p>Development proposals should incorporate the following principle requirements covering movement and transportation:</p> <ol style="list-style-type: none"> demonstrate that the strategic and local highway network can absorb the traffic impacts of the development without adversely affecting the safe and efficient flow of traffic on the network or that traffic impacts can be environmentally managed to acceptable levels to reduce and mitigate any adverse impacts from the development; promote and, where possible, incorporate integrated transport connections and supporting infrastructure (depending on the nature and location of the site), including access to services by means other than private motorised transport; encourage active travel behaviour to reduce numbers of short distance car journeys through the use of travel plans and other promotional and awareness raising activities;

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		<p>4. ensure that developments are designed and laid out to achieve safe entrance and exit, have appropriate operational and manoeuvring space, accommodate provision for all modes of transport, the needs of people with disabilities and provide safe access for the emergency services;</p> <p>5. protect existing local and strategic long distance footways, cycleways and bridleways unless an alternative route of at least equal utility value can be used, and facilitate improvements to existing or provide new connections to these routes, especially where such schemes have been identified in the Local Transport Plan and/or Infrastructure Delivery Plan; and</p> <p>6. empty with <u>have regard to</u> both the council's Highways Development Design Guide and cycle and vehicle parking standards as prescribed in the Local Transport Plan - having regard to the location of the site and need to promote sustainable travel choices.</p> <p>Where traffic management measures are introduced they should be designed in a way which respects the character of the surrounding area including its landscape character. Where appropriate, the principle of shared spaces will be encouraged.</p>
General Policies – Economic Prosperity		
MM050.	5.2.4	<p>Delete</p> <p>As shown in Figure 5.2, in order to cater for the needs of the plan period within Herefordshire as a whole, it is estimated that there is currently approximately 118 hectares of employment land supply either previously allocated (without planning permission) or committed (sites with planning permission where employment development has not started (n/s) or is under construction (u/c)).</p>
MM051.	E2	<p>Delete Figure 5.2</p> <p>Policy E2 – Redevelopment of existing employment land and buildings</p> <p>In criterion 1 delete “release” replace with “development”</p> <p>1. the release <u>development</u> of the site for other uses would not result in an overall shortage in the quality and quantity of employment land supply in the area; or</p>
MM052.	E4	<p>Policy E4 - Tourism</p> <p>Amend paragraph 1 and third criterion:</p> <p>Herefordshire will be promoted as a destination for quality leisure visits and sustainable tourism by utilising, conserving and enhancing the county's unique environmental and heritage assets and by recognising the intrinsic character and beauty of the countryside. In particular, the tourist industry will be supported by <u>a number of measures including:</u></p>

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		<p>1. recognising the unique historic character of Hereford and the market towns as key visitor attractions and as locations to focus the provision of new larger scale tourist development;</p> <p>2. the development of sustainable tourism opportunities, capitalising on assets such as the county's landscape, rivers, other waterways and attractive rural settlements, where there is no detrimental impact on the county's varied natural and heritage assets or on the overall character and quality of the environment. Particular regard will be had to conserving the landscape and scenic beauty in the Areas of Outstanding Natural Beauty;</p> <p>3. retaining and enhancing existing, and encouraging new, accommodation and attractions throughout the county, which will help to diversify the tourist provision, extend the tourist season and increase the number of visitors staying overnight. In particular proposals for a high standard hotel with business and conferencing facilities <u>new hotels</u> in Hereford will be encouraged. Applicants will be encouraged to provide a 'Hotel Needs Assessment' for any applications for new hotels;</p> <p>4. ensuring that cycling, walking and heritage tourism is encouraged by facilitating the development of long distance walking and cycling routes, food and drink trails and heritage trails, including improvements to public rights of way, whilst having special regard for the visual amenity of such routes and trails, and for the setting of heritage assets in their vicinity; and</p> <p>5. the safeguarding of the historic route of the Herefordshire and Gloucestershire Canal (shown on the Policies Map), together with its infrastructure, buildings, towpath and features. Where the original alignment cannot be re-established, a corridor allowing for deviations will be safeguarded. New developments within or immediately adjoining the safeguarded corridor will be required to incorporate land for canal restoration. Development not connected with the canal that would prevent or prejudice the restoration of a continuous route will not be permitted.</p>												
MIM053.	5.2.28	<p>The National Planning Policy Framework requires local planning authorities to set thresholds to determine the requirement for an impact assessment for applications for retail, leisure and office development outside of town centres. Individual thresholds have been set for Hereford and the market towns as follows, and are included within the individual Place Shaping policies:</p> <table border="0"> <tr> <td>Hereford</td> <td>1250 sq.m <u>700 sq.m</u></td> </tr> <tr> <td>Bromyard</td> <td>200 sq.m</td> </tr> <tr> <td>Kington</td> <td>200 sq.m</td> </tr> <tr> <td>Ledbury</td> <td>500 sq.m <u>400 sq.m</u></td> </tr> <tr> <td>Leominster</td> <td>500 sq.m <u>400 sq.m</u></td> </tr> <tr> <td>Ross-on-Wye</td> <td>500 sq.m <u>400 sq.m</u></td> </tr> </table>	Hereford	1250 sq.m <u>700 sq.m</u>	Bromyard	200 sq.m	Kington	200 sq.m	Ledbury	500 sq.m <u>400 sq.m</u>	Leominster	500 sq.m <u>400 sq.m</u>	Ross-on-Wye	500 sq.m <u>400 sq.m</u>
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General Policies – Environmental Quality		
MM054.	LD1	<p>Policy LD1 – Landscape and townscape Development proposals should be in accordance with landscape management objectives and townscape assessments and achieve all the following objectives:</p> <ul style="list-style-type: none"> • demonstrate that character of the landscape and townscape has positively influenced the design, scale, nature and site selection, including protection and enhancement of the setting of settlements and designated areas; • conserve and enhance the natural, historic and scenic beauty of important landscapes and features, including Areas of Outstanding Natural Beauty, nationally and locally designated parks and gardens and conservation areas; through the protection of the area's character and by enabling appropriate uses, design and management; • incorporate new landscape schemes and their management to ensure development integrates appropriately into its surroundings; and • maintain and extend tree cover where important to amenity, through the retention of important trees, appropriate replacement of trees lost through development and new planting to support green infrastructure
MM055.	LD2	<p>Policy LD2 – Biodiversity and Geodiversity Development proposals should conserve, restore and enhance the biodiversity and geodiversity assets of Herefordshire, incorporating the following objectives through the:</p> <ol style="list-style-type: none"> 1. retention and protection of sites, networks and species of European, national and local importance and those identified within biodiversity and geodiversity action plans <u>nature conservation sites and habitats, and important species in accordance with their status as follows:</u> <ol style="list-style-type: none"> a) <u>Development that is likely to harm sites and species of European Importance will not be permitted;</u> b) <u>Development that would be liable to harm Sites of Special Scientific Interest or nationally protected species will only be permitted if the conservation status of their habitat or important physical features can be protected by conditions or other material considerations are sufficient to outweigh nature conservation considerations;</u> c) <u>Development that would be liable to harm the nature conservation value of a site or species of local nature conservation interest will only be permitted if the importance of the development outweighs the local value of the site, habitat or physical feature that supports important species.</u>

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		<p>d) <u>Development that will potentially reduce the coherence and effectiveness of the ecological network of sites will only be permitted where adequate compensatory measures are brought forward.</u></p> <p>2. restoration and enhancement of existing biodiversity and geodiversity features on site and connectivity to wider ecological networks; and</p> <p>3. creation of new biodiversity features and wildlife habitats.</p> <p>Where appropriate the council will work with developers to agree a management strategy to ensure the protection of, and prevention of adverse impacts on, biodiversity and geodiversity features.</p>
	5.3.13	<p>Delete last sentence: Where harm cannot be avoided, compensatory measures should be included to offset any losses or adverse effects.</p>
	5.3.14	<p>Dependent upon the scale and proximity of development proposals to biodiversity or geodiversity features, Herefordshire Council will seek <u>may require developers to produce a management strategy to ensure the continued protection of the features of interest.</u> Such management strategies may include monitoring information. This will provide up-to-date information which will shape future policy reviews as well as inform future site specific plans</p>
MM056.	LD3	<p>Policy LD3 – Green infrastructure</p> <p>Development proposals should protect, manage and plan for the preservation of existing and delivery of new green infrastructure, and should achieve the following objectives:</p> <ol style="list-style-type: none"> 1. identification and retention of existing green infrastructure corridors and linkages; including the protection of valued landscapes, trees, hedgerows, woodlands, water courses and adjoining flood plain; 2. provision of on-site green infrastructure, <u>in particular proposals will be supported where this enhances the network;</u> and 3. integration with, and connection to, the surrounding green infrastructure network.

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MM057.	LD4	<p>LD4 Historic Environment and Heritage Assets :</p> <p>Development proposals affecting heritage assets and the wider historic environment should achieve the following objectives:</p> <ol style="list-style-type: none"> <u>1. the conservation, and where appropriate enhancement of preserve or where possible enhance heritage assets and their settings that positively contribute to the character of a site, townscape and/or wider environment, including conservation areas in a manner appropriate to their significance through appropriate management, uses and sympathetic design, in particular emphasising the original form and function where possible ;</u> <u>2. the conservation and enhancement of heritage assets and their settings through appropriate management, uses and sympathetic design where opportunities exist, contribute to the character and local distinctiveness of the townscape or wider environment, especially within conservation areas;</u> <u>3. use the retention, repair and sustainable use of heritage assets to provide as a focus for wider regeneration schemes; and</u> <u>4. the appropriate recording of heritage assets in mitigation of development impact, in cases where agreed loss occurs record and advance the understanding of the significance of any heritage assets to be lost (wholly or in part) and to make this evidence or archive generated publicly accessible; and</u> <u>5. where appropriate, improve the understanding of and public access to the heritage asset.</u> <p>The scope of the works required to protect, conserve and enhance heritage assets and their settings should be proportionate to their significance. Development schemes should emphasise the original form and function of any asset and, where appropriate, improve the understanding of and public access to them.</p>
	5.3.27	<p>Delete final two sentences Where it is agreed that a heritage asset cannot be retained, then mitigation includes, as a minimum requirement, the recording of material that may be lost. Other mitigatory or compensatory measures may however be necessary.</p> <p>Replace these sentences with: '<u>Where the loss of or substantial harm to a heritage asset or its significance is outweighed by the public benefits of a development proposal which is allowed to proceed, developers shall, in a manner proportionate to its importance, record and advance understanding of the heritage asset. This evidence shall be made publicly accessible normally through Herefordshire Historic Environment Record, a museum or other local archive as appropriate.</u>'</p>

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MM058.	SD1	<p>Policy SD1 – Sustainable Design and Energy Efficiency</p> <p>Development proposals should <u>include high-quality sustainable design that also creates a safe, accessible well-integrated environment create safe, sustainable, well integrated environments</u> for all members of the community. In conjunction with this, all development proposals should incorporate the following requirements:</p> <ul style="list-style-type: none"> • <u>ensure that proposals make efficient use of land - taking into account the local context and site characteristics,</u> • <u>new buildings should be designed to maintain local distinctiveness through incorporating local architectural detailing and materials and respecting scale, height, proportions and massing of surrounding development. while making a positive contribution to the architectural diversity and character of the area including, where appropriate, through innovative design; be designed to preserve and enhance locally distinctive built, historic and natural characteristics of a site and its surroundings and/or make a positive contribution to the architectural diversity and character of the area through appropriate layout, siting, scale, height, proportions and massing, orientation, use, architectural detailing, landscaping and materials</u> • <u>safeguard residential amenity for existing and proposed residents;</u> • <u>ensure new development does not contribute to, or suffer from, adverse impacts arising from noise, light or air contamination, land instability or cause ground water pollution;</u> • <u>where contaminated land is present, undertake appropriate remediation where it can be demonstrated that this will be effective; ; # relation to development proposals on contaminated land, it is demonstrated that appropriate remediation can be obtained</u> • <u>ensure that distinctive features of existing buildings and their setting are safeguarded and where appropriate, restored;</u> • <u>utilise physical sustainability measures that include, in particular, orientation of buildings, the provision of water conservation measures, storage for bicycles and waste including provision for recycling, and enabling renewable energy and energy conservation infrastructure;</u> • <u>minimise resource use and carbon dioxide emissions by maximising the energy and water efficiency of buildings prioritising a “fabric first” approach. Where possible, on-site renewable energy generation should also be incorporated;</u> • <u>allow easy access for all members of the community throughout the development facilitating shorter links between destinations, and allowing for a range of sustainable transport modes</u> • <u>optimise the use of previously developed land and/or buildings;</u> • <u>create safe and accessible environments, addressing crime prevention and community safety and the location of establishments where hazardous substances are present that minimise opportunities for crime and antisocial behaviour by incorporating Secured by Design principles, and consider the incorporation of fire safety measures;</u> • <u>ensuring designs can be easily adapted and accommodate new technologies to meet changing needs throughout the lifetime of the development; and</u> • <u>utilise sustainable construction methods which minimise the use of non-renewable resources and maximise the use of recycled and</u>

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		<p>sustainably sourced materials;</p> <ul style="list-style-type: none"> • that the design of the development is resilient to climate change including minimising flood risk in accordance with policy SD3; and • include elements that contribute to the provision of green infrastructure in accordance with policy LD3. <p>All planning applications including material changes of use, will be expected to demonstrate how the above design and energy efficiency considerations have been factored into the proposal from the outset.</p>
	5.3.32	<p>Amend second sentence of the policy onwards as follows:</p> <p>In terms of energy conservation, developments in sustainable locations that achieve 'Passivhaus' accreditation will be supported, unless the adverse landscape, townscape or visual impacts of doing so would significantly outweigh the benefits of achieving Passivhaus. Developments in sustainable locations that achieve other accreditation standards, such as BREEM and the Code for Sustainable Homes, accredited standards of energy conservation which cover a range of sustainability criteria, will also be supported particularly where the level achieved materially exceeds the relevant Building Regulations and other relevant standards in place at the time.</p>
	5.3.33	<p>Amend first sentence:</p> <p>Large-scale developments (non-residential developments exceeding 1,000 square metres gross floorspace, and new residential developments comprising 10 or more units, whether new build or conversion) will be expected to should demonstrate how opportunities for on-site renewable energy generation and sustainable waste management have also been considered and addressed within the design of the scheme.</p>
MM059.	SD2	<p>Policy SD2 – Renewable and low carbon energy generation</p> <p>Development proposals that seek to deliver renewable and low carbon energy targets in line with the UK Renewable Energy Strategy (or any future national equivalent) will be supported where they meet the following criteria:</p> <ol style="list-style-type: none"> 1. the proposal does not adversely impact upon the objectives for international or national designated natural and historic environmental heritage assets; 2. the proposal does not adversely affect residential amenity; 3. the proposal does not result in any significant detrimental impact upon the character of the landscape and the built or historic environment; and <p>the proposal can be connected efficiently to existing national grid infrastructure unless it can be demonstrated that energy generation would be used on-site to meet the needs of a specific end user.</p>
MM060.	New para	<p>Add new para before 5.3.46 as follows:</p> <p>*.*.* The 'Sequential Test' is set out in paragraphs 100-104 of the NPPF. This aims to ensure inappropriate development does not take place in areas at high risk of flooding by directing it away from areas at highest risk. Areas at risk of flooding are those falling within Flood Zones 2</p>

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MM061.	ID1	<p>and 3 as defined on the Environment Agency's website. Flood Zone 1 is the area of low probability of flooding and should generally be used in preference to land in other zones. However land in Flood Zone 1 may also have critical land drainage problems which can be ascertained through Herefordshire Council's Land Drainage team. Where no reasonable sites are available within Flood Zone 1 the 'Exception Test' may be applied. Where this test needs to be applied certain forms of development may be permitted in Flood Zones 2 and 3 depending upon their level of vulnerability. These are identified in Technical Guidance to the National Planning Policy Framework.</p> <p>Policy ID1- Infrastructure Delivery</p> <p><u>Provision for new and/or the enhancement of existing infrastructure, services and facilities to support development and sustainable communities, will be achieved through a co-ordinated approach.</u></p> <p><u>Where necessary, in addition to planning conditions for essential on-site design requirements and critical infrastructure, developer contributions towards strategic infrastructure through s106 agreements and/or a future Community Infrastructure Levy (CIL), will be secured in accordance with national planning policies and other relevant legislation.</u></p> <p><u>A Planning Obligations Supplementary Planning Document (SPD) will provide details of the type and scale of obligations that may apply.</u></p> <p><u>Provision for new, and the enhancement of existing infrastructure, services and facilities to support development and sustainable communities, will be achieved through a co-ordinated approach. This will include, in addition to planning conditions for essential on-site design requirements and critical infrastructure:</u></p> <ol style="list-style-type: none"> 1. contributing towards strategic infrastructure from new development through a mandatory tariff system; 2. s106 contributions for specific infrastructure from all types of development directly required in order for the development to be considered acceptable in accordance with national and local planning policies and relevant legislation; 3. utilising government funding sources; 4. linking with other public investment programmes; 5. co-ordinating with the capital investment programmes of the gas, electric, telecommunications and water industries (utilities); 6. other new funding or innovative investment approaches. <p>Tariff contributions will be used to service the following community infrastructure:</p> <ol style="list-style-type: none"> a) physical infrastructure including, improved pedestrian, cycle and bus routes, the construction of the Hereford western relief road, the city link road, park and ride sites and transport hub; strategic sewerage; strategic flood defence, projects arising from the Nutrient Management Plan; renewable energy generation; and broadband provision; b) social infrastructure including; education, healthcare, emergency services, community facilities, built sports facilities, cultural facilities including improvements to the built environment and public realm; and

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		<p>e) green infrastructure including play areas, parks, allotments and green spaces, sporting and recreation facilities, heritage assets and habitat creation.</p> <p>Section 106 contributions will be used to service specific on and off site infrastructure requirements to include, affordable housing, water management including sustainable drainage, safe and sustainable access and transport links, essential utilities (including sustainable alternatives), play, sport and recreation facilities, landscaping and associated maintenance payments.</p>
MM062.	3.113	<p>Add following sentence at the beginning of paragraph 'Where changes are made to National planning policy the annual monitoring process will be used to identify if the policies set out in the spatial strategy require review.'</p> <p>And amend:</p> <p>Social</p> <ul style="list-style-type: none"> housing completions by <u>size</u>, type and tenure and location – assessed in relation to 5 year periods in order to ensure that there remains a flexible supply of available and deliverable land for housing across the county;”
MM063.	New para	<p>Insert a new paragraph to follow after Para 4.5.5 to read:</p> <p>* . * <u>The figures for employment (as with housing) are targets for the whole plan period and will be monitored through the Annual Monitoring Process to assess performance and the need for management measures.</u>“</p>
MM064.	6.23	<p>If it appears that the policies are not being effective, the following actions will be taken:</p> <ul style="list-style-type: none"> review of the policy or policies concerned and of the implementation mechanisms <u>which may include a full or partial review of the plan; and;</u> actions to slow-er speed up the delivery of land for development depending on the rate of development achieved; and/or identification of alternative or additional land through further Development Plan Documents and/or Neighbourhood Development Plans.
MM065.	Appendices DELETE TEXT	<p>New appendices (3-8) will be added to the Core Strategy. The contents of Appendix 1 have been updated.</p> <p>Appendix 1 – Saved Unitary Development Plan (2007) policies and proposals maps (including policies to be replaced by the Local Plan – Core Strategy)</p>

Ref No	Policy/ Para/ Figure	Proposed Main Modification
		<p>Appendix 2 – Evidence Base</p> <p><u>Appendix 3 – Implementation, Monitoring and Delivery Plan</u></p> <p><u>Appendix 4 – Detailed Annualised Trajectory</u></p> <p><u>Appendix 5 – SS3: Necessary Infrastructure for Strategic Sites</u></p> <p><u>Appendix 6 – SS5: Key Employment Sites Deliverability and Timescales</u></p> <p>Appendix 7 – Housing Value Areas by Postcode</p> <p>Appendix 8 – Sites with Environmental Designations</p> <p>A- <u>Conservation Areas</u></p> <p>B- <u>Scheduled Ancient Monuments (SAMs)</u></p> <p>C- <u>Registered Historic Parks and Gardens</u></p> <p>D- <u>Unregistered Parks and Gardens</u></p> <p>E- <u>Special Areas of Conservation (SACs)</u></p> <p>F- <u>Sites of Special Scientific Interest (SSSIs)</u></p> <p>G- <u>National Nature Reserves (NNRs)</u></p> <p>H- <u>Local Nature Reserves (LNRs)</u></p> <p>I- <u>Special Wildlife Sites (SWS)</u></p> <p>J- <u>Local Geological Sites</u></p> <p>K- <u>Areas of Ancient and Semi-Natural Woodland</u></p>
Section 5: General Policies – Environmental Quality		
MM066.	SD3	<p>Amend bullet 6:</p> <p>6. water conservation and efficiency measures are included in all new developments, specifically:</p>

Ref No	Policy/ Para/ Figure	Proposed Main Modification
		<ul style="list-style-type: none"> • residential development <u>should achieve Housing - Optional Technical Standards - Water efficiency standards to meet the equivalent of Code for Sustainable Homes Level 5 for water efficiency (80 litres/person/day) At the time of adoption the published water efficiency standards were 110 litres/person/day; or</u> • non-residential developments in excess of 1,000 sq.m gross floorspace to achieve the equivalent of BREEAM 3 credits for water consumption as a minimum;
MM067.	Para. 5.3.40	<p>Add to end of paragraph:</p> <p>In respect of wind energy, National Planning Policy Guidance indicates that in order to gain planning permission suitable areas for wind energy development will need to have been allocated clearly in a Local or Neighbourhood Plan. Therefore, Herefordshire Council will consider whether to identify suitable areas for wind energy through the preparation of the Rural Areas Site Allocation Development Plan Document or other appropriate development plan document. Neighbourhood Development Plans also have the ability to consider identifying suitable sites for wind energy development.</p>
	SD2	<p>Add to end of policy:</p> <p>In the case of energy generation through wind power developments, permission will only be granted for such proposals where:</p> <ul style="list-style-type: none"> • the proposed site is identified in a Neighbourhood Development Plan or other Development Plan Document as a suitable site for wind energy generation; and • following consultation with local residents, it can be demonstrated that the planning impacts identified can be fully addressed, and therefore the proposal has the backing of the local community.



Herefordshire Local Plan Core Strategy Minor Modifications October 2015

Minor Modifications

This schedule includes a list of proposed minor modifications to the Core Strategy. Unlike the main modifications they do not relate to the soundness of the plan.

This schedule includes modifications that arose from the hearing sessions that took place between 10th February and 25th February 2015. It also includes minor modifications that were included in the Examination Document A10, Schedule of Minor Changes (where these have not been superseded by other changes). Minor modification E.197 is included as a consequence of the withdrawal of the Code for Sustainable Homes by the Government.

This schedule also includes a list of further minor modifications arising in response to the consultation on the Plan's Main Modifications. The Inspector's Report, (paragraphs 4 and 100), indicates that such modifications are a matter for Herefordshire Council.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
1. Introduction and Background			
E.1	1.1	<p>Amend paragraph:</p> <p>The council is preparing a number of planning documents known as the Local Plan to guide development and change in the county over the next 20 years up to 2031. Other documents, such as a Sustainability Appraisal, which form part of the Local Plan evidence base, have also been prepared. The is made up of a number of documents including the Core Strategy. A list of all the Local Plan documents being prepared, and their timetables, are set out in a project planning document called the Local Development Scheme.</p>	To remove unnecessary text and to clarify the text.
E.2	1.2	<p>Delete paragraph:</p> <p>The title of "Local Plan", introduced through the National Planning Policy Framework, 2012 replaces the original notation of "Local Development Framework" or LDF which was in use when we started production of a replacement development plan to the adopted Herefordshire Unitary Development Plan 2007.</p>	To remove unnecessary text.
E.3	1.3	<p>Amend 4th bullet point:</p> <ul style="list-style-type: none"> protect, conserve and enhance valued natural, historic and built environments, including areas of outstanding natural beauty, special areas of conservation, open spaces as well as the county's intrinsic attractive character; 	To provide a consistent approach throughout the document.
E.4	1.6	<p>Amend paragraph to read:</p> <p>The Core Strategy does not allocate land directly, but proposes broad strategic directions for growth in sustainable locations. A further Hereford Area Plan and other Development Plan Documents (DPD) and Neighbourhood Development Plans (NDP) are proposed to follow the Core Strategy and will allocate large, medium and small sites to meet the identified development requirements for the county. Figure 1.1 shows how the Core Strategy forms part of the Local Plan and how it relates to other planning documents and links to the Sustainable Community Strategy.</p>	To provide greater clarity.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.5	1.9	Delete paragraph and title. <u>“Changes to the plan since the last consultation</u> 1.9 This Pre – Submission Publication version of the Core Strategy includes both strategic and development management policy guidance in response to new national guidance set out in the National Planning Policy Framework 2012. This has meant a significantly revised set of policies from that set out in the Preferred Options (2010) and Revised Preferred Options (2011) stages of the plan, which set out to cover purely strategic issues. Other influences have also affected the policy writing, including the issues raised during consultation, the emergence of new or updated evidence and other external influences such as other bodies’ plans and programmes. The Sustainability Appraisal Report accompanying this document details in an “audit trail” how the policies in this version have emerged over the various stages of production. Later in this section, paragraph 1.26 on “Consultation” lists the stages in the production of this document to date.”	To remove out of date text.
E.6	Fig 1.1	Delete and replace diagram	To update text and improve clarity.
E.7	1.10	Amend paragraph to read: Planning policies for Herefordshire have been need to be prepared in the context of national planning policy and guidance set out in the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG). and with regard has also been had to other plans and strategies produced by the council and other organisations. National policies on planning matters are contained in the National Planning Policy Framework (NPPF) and the Technical Guidance to the NPPF.	To update text.
E.8	1.11	Delete paragraph: “The West Midlands Regional Spatial Strategy (RSS) was previously part of the planning framework, however it was formally revoked on the 20th May 2013. The council does not consider that the revocation of the RSS will undermine the Core Strategy as it has produced its own, independent evidence base regarding housing requirements and still carries through some of the original objectives of the RSS such as housing delivery and strengthening the employment offer of the county.”	To remove unnecessary text.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.9	1.12	The principal role of the Core Strategy is to deliver the spatial planning strategy for Herefordshire based on the local characteristics of the area. The draft Core Strategy <u>it is based on the outcomes of the consultations that have taken place, other council plans, programmes and initiatives and also on the findings of the evidence base that has been prepared to support it. It is also underpinned by a Sustainability Appraisal which assessed the social, economic and environmental impacts of the Core Strategy throughout the development of the document and a Habitats Regulations Assessment which has assessed any impacts on protected European sites.</u>	To update text.
E.10	1.14	A Herefordshire Travellers' Sites Document (DPD) will be prepared. This document will set out allocations and planning policies relating to the provision for travellers in the county to cover the plan period to 2031. This DPD is included in the Local Development Scheme.	To correct name of the DPD and to remove unnecessary text.
E.11	1.15	The Sustainable Community Strategy (SCS); The Herefordshire Plan, 2010 sets out a long-term vision for the county <u>up to 2020</u> and has been developed by the Herefordshire Partnership. The latter comprises of a range of local people and organisations, including business groups and public sector bodies. The purpose of the <u>SCS Herefordshire Plan</u> is to set a clear vision and direction focusing on improving the social, economic, and environmental well-being of the area, in addition to providing an overarching framework within which other local strategies will sit. The policies and proposals within the Core Strategy will help to deliver some of the SCS priorities. Equally, the themes from the SCS have helped to guide the strategic objectives of the Core Strategy.	To simplify the document title.
E.12	1.20	Delete and add text as follows: The council's Local Transport Plan (LTP) establishes the framework for the delivery of all aspects of transport and travel for Herefordshire. The development of the LTP and the Core Strategy has been a linked process. The council's emerging LTP covers the first part of the Core Strategy period from April 201 <u>2</u> 3 / <u>14</u> to 2015/ <u>16</u> and is an important local document which supports the delivery of the Core Strategy. The LTP will be updated to include key elements of infrastructure set out in the Core Strategy following its adoption.	To update text regarding the LTP.
E.13	1.22	Amend Paragraph to read: The Herefordshire Local Investment Plan, 2011- <u>2026</u> has been developed by Herefordshire Council in partnership with the Homes and Communities Agency. It provides a strategic framework within which the organisations will work and invest together alongside partners in the public and private sectors to deliver the key priorities in meeting the vision for Herefordshire	To include end date of the Local Investment Plan

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.14	1.25	<p>Amend text: Future strategies and plans may become relevant during the plan period. In particular Herefordshire Council, as the Lead Local Flood Authority (LLFA) for the county, has new responsibilities towards responsibility for the management of local flood risks. One of its duties is to develop a Local Flood Risk Management Strategy and its main focus will be on addressing flooding from surface water, groundwater and ordinary watercourses. The strategy is currently being prepared. In addition, Herefordshire Council is one of a number of organisations that is involved in the preparation of a county-wide Carbon Reduction Strategy in order to meet targets for reduction in line with the Climate Change Act 2008. This will seek a 34% reduction of carbon on 1990 levels by 2020.</p>	To update text.
E.15	1.26	<p>Amend paragraph to read: One of the main principles of development plan preparation is that local communities are involved from the outset. This approach is set out in national policy and in Herefordshire's Statement of Community Involvement 2007, which forms part of the Local Plan. To ensure early engagement on the preparation of the Core Strategy and the opportunity to comment and help shape it, the following key stages of consultation have been <u>were</u> undertaken:</p> <ol style="list-style-type: none"> 1. Issues Paper (Autumn 2007) 2. Developing Options Paper (Summer 2008) 3. Place Shaping Paper (Spring 2010) 4. Preferred Options (Autumn 2010) 5. Revised Preferred Options (Autumn 2011) 6. Draft Core Strategy (Spring 2013) 7. <u>Pre-submission Publication (Summer 2014)</u> 8. <u>Main Modifications (Spring 2015)</u> 	To update text
E.16	1.27	<p>Delete paragraph: This stage in the process of preparing the Core Strategy is the publication of a Pre-Submission Publication version. Subject to consideration of the responses to this stage, the Core Strategy will then be submitted for examination, with its final adoption anticipated later in 2014.</p>	Remove out of date text.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.17	1.29	Delete and replace paragraph: English strategic authorities adjoining Herefordshire are: Worcestershire County Council, Shropshire Council and Gloucestershire County Council, which deal with waste and minerals matters. There is a joint Municipal Waste Management Strategy (2004-2034) between Herefordshire and Worcestershire and this has had great success. Residents have helped to meet its aims through reducing the amount of waste thrown away and by increasing the amount of waste recycled. Herefordshire shares boundaries with five English local authorities and three Welsh local authorities. The English authorities are the two strategic planning authorities of Worcestershire and Gloucestershire County Councils, both of which are responsible for waste and minerals planning. Malvern Hills and Forest of Dean District Councils are the respective local planning authorities for their two tier structure. Shropshire County is a unitary authority. The three neighbouring Welsh authorities are Monmouthshire County Council, Powys County Council and the Brecon Beacons National Park Authority.	For greater clarity.
E.18	1.30	Amend paragraph: Herefordshire contains parts of two protected landscapes of national importance: the Wye Valley and Malvern Hills Areas of Outstanding Natural Beauty (AONB). These adjoin Monmouthshire and Worcestershire respectively (see Figure 1.2). The emerging Core Strategy must ensure a consistency of approach to development within both areas through its planning policies, and joint working via the AONB partnerships and implementation of the AONB management boards plans.	To make the text more complete
E.19	Figure 1.2	Amend title and diagram to read: Herefordshire's Adjoining Authorities and Areas of Outstanding Natural Beauty	To clarify contents of diagram.
E.20	1.31	Delete paragraph: "Herefordshire and Shropshire Councils have worked closely together in the production of a housing evidence base including the Strategic Housing Market Assessment 2008 for the West Housing Market Area and on a joint housing strategy joint working has also taken place historically on an assessment of the needs of gypsies and travellers in the area. Alongside other constituent authorities, Herefordshire has been involved in the development of the Marches Local Enterprise Partnership (LEP), which is further detailed later in this section."	To remove unnecessary text.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.21	1.32	Delete paragraph: “Although the adjoining Welsh authorities of Powys and Monmouthshire are subject to a different national planning policy framework, joint working on issues of water resources and water treatment is being carried out, since all three authorities are served by the same water company – Dwr Cymru Welsh Water. As Herefordshire is adjacent to Wales regard has also been had to its national guidance, Planning Policy Wales (November 2012).”	To remove unnecessary text.
E.22	1.33	Delete parts of bullet point 1 and 2: 1) The Fastershire Project involves close co-operation with Gloucestershire County Council to utilise government and private sector funding to provide access to faster broadband. The project area covers all homes and businesses in Herefordshire and Gloucestershire that would otherwise not have received faster broadband without government intervention 2) The underlying aim of the Core Strategy of promoting regeneration in Hereford highlights a move towards creating a more sustainable county with improved employment, leisure, and cultural opportunities, thereby potentially reducing some cross-boundary movements. Herefordshire has formed a Local Enterprise Partnership (LEP) with Shropshire and Telford because of the common issues between the areas. The Marches LEP will be used to share resources to create benefits for local businesses and raise the profile of the area. One example of this is the creation of the Hereford Enterprise Zone at Rotherwas (Fig.1.3). The Enterprise Zone has a focus on the defence and security sector, with additional employment hubs focused on advanced technologies, environmental technologies and food and drink technologies. It is intended that the scheme will become a catalyst for enhanced economic growth throughout the towns of the Marches through the creation of highly skilled jobs and the encouragement of overseas investment. The Marches LEP Board has approved Poised for Growth, a high level planning and housing statement which sets out a pledge to work pro-actively with developers and businesses to create economic growth across the LEP area. It has also produced a draft Marches Strategic Economic Plan 2014-2020 which promotes investment in Herefordshire, specifically referring to the need for the Western Relief Road and investment at Hereford Enterprise Zone.”	To remove unnecessary text.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.23	1.34	<p>Amend first sentence to read: The Core Strategy must be <u>is</u> underpinned by a robust evidence base that is regularly reviewed to inform decision and plan making. The policies and proposals must be both informed by and assessed against relevant available evidence. The list of documents and sources making up this evidence base is set out in Appendix 2.</p>	To update text.
E.24	1.35	<p>Amend final sentence of the paragraph: This Core Strategy document has been assessed against these sustainability criteria and the results made available can be found in the Sustainability Appraisal Report, to ensure that the draft proposals are those that perform most satisfactorily when evaluated against reasonable alternatives.</p>	To remove unnecessary text.
E.25	1.37	<p>Amend wording: Monitoring and review are key aspects of the approach to the preparation of Local Plans. Continuous monitoring enables an assessment of the effectiveness of the Core Strategy and the policies contained within it in terms of both delivering and controlling various types of development across the county. As part of the Town and Country Planning (Local Planning) (England) Regulations 2012, the council is required to prepare an <u>Authority Annual</u> Monitoring Reports containing information on all the plans set out in the local planning authority's Local Development Scheme. One of the key functions of the report is to monitor policies contained within Development Plan Documents and to report on their performance, particularly where policies are not being implemented and why and also where policies specify a target of net additional dwellings or net additional affordable dwellings to be reached.</p>	To update terminology.
E.26	1.38	<p>Amend wording: To assess the performance of the Core Strategy, a separate monitoring framework is set out at the end of each section and in <u>Appendix 3</u> which will be implemented after adoption of the plan. This includes key plan indicators as well as those to monitor the sustainability of the plan. Where policies are not performing as intended, the annual monitoring report <u>process</u> will suggest the actions that need to be taken to address the issues. It is intended that, in addition to annual monitoring, a five-yearly cycle of a more comprehensive review of the Core Strategy is established, with dates of 2019 and 2024. Review processes would need to commence in advance of the review dates to enable any new policies to be adopted in a timely manner.</p>	To update references to monitoring.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.27	1.42	Insert new sentence at end of the paragraph: If monitoring shows that residential sites are coming forward more slowly than planned, the Hereford Area Plan, Neighbourhood Development Plans and other Development Plan Documents will provide the opportunity to review other designations/policies to bring further sites forward if necessary. <u>The mechanisms set out in Policy SS3 may also be used.</u>	To update the plan
2. Herefordshire Context			
E.28	2.2	Insert updated web address http://factsandfigures.herefordshire.gov.uk/	To update the plan
E.29	2.23	Amend second sentence to read: The relocation of Hereford's livestock market and This scheme offers an opportunity to transform this under-utilised area, regenerate the local economy and widen the experiences offered by the city, strengthening its role in the county and region. <u>The relocation of Hereford's livestock market and the opening of the Old Market mixed retail and leisure redevelopment in 2014 has transformed an under-utilised area, regenerated the local economy and enhanced the experiences offered by the city, strengthening its role in the county and region. The Old Market development also anchors the proposed urban village to the north.</u>	To update the plan and reflect the opening of the Old Market
E.30	2.24	Amend Table preceding para 2.24 'Environmental quality – key facts' Natural environment: 2 Areas of Outstanding National Natural Beauty (AONB) 4 Special Areas of Conservation (SAC) 77 Sites of Special Scientific Interest (SSSI) 3 National Nature Reserves (NNR) 773 Local Wildlife Sites (LWS) <u>131 Local Geological Sites</u> Historic environment: 5899 Listed buildings 263 Scheduled Ancient Monuments (SAM) 24 Registered historic parks and gardens 64 Conservation areas Flooding: 10% of land within Flood Zone 2 (low to medium risk) 9% within a Flood Zone 3 (high risk)	To update the plan

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.31	2.24	<p>Amend paragraph to read: Herefordshire is considered to be the West Midlands' most rural county. The countryside is rich and varied, ranging from the high hills of the border areas and the dramatic steep sloping Wye Gorge, to the gentle rolling slopes of the Golden and Teme Valleys and the low lying river meadows of central Herefordshire. Large tracts of this landscape are of high quality with the Wye Valley and Malvern Hills having national AONB designation, whilst the area along the western boundary with the Brecon Beacons National Park is <u>also</u> of the highest quality it lacks any national designation. Many ancient local landscapes continue to survive intact in the face of development pressures and the county's remoter areas often possess a continuity and tranquillity that is increasingly scarce</p>	To update the plan
E.32	2.34	<p>Amend paragraph to read: As already indicated, the River Wye and its tributaries are amongst the most important natural assets of Herefordshire. However, phosphate levels in small sections of the River Wye Special Area of Conservation (SAC) are presently exceeding the conservation objectives for the river, degrading the ecosystem. This is the result of controlled waste water discharges associated with residential and industrial developments and agricultural practices in the catchment area. Therefore, to ensure all sections of the River Wye SAC (including the River Lugg section) meet the favourable condition phosphate target it is essential that future inputs are controlled. The catchment of the Wye covers a significant area of the county and a continuing programme of management and improvements is necessary to facilitate new development during the plan period</p>	To update the plan

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.33	2.36	<p>Amend Table following 2.36 ‘Summary of environmental issues, problems & challenges’</p> <ul style="list-style-type: none"> • Protect, <u>conserve</u> and <u>where possible</u> enhance the county’s rich natural and historic assets • Address climate change and flooding • Plan for the potential impact of climate change in new developments • Ensure new developments are of high quality design and construction reflecting Herefordshire’s distinctive character • Use resources efficiently • Improve air and water quality • Continue reducing waste levels, including increasing recycling and a reduction in the amount of waste going to landfill 	To update the plan, and reflect revised process for dealing with minerals and waste issues.
3. Vision, Objectives and Spatial Strategy			
E.34	3.6	<p>Amend paragraph to read: By 2031, decent, affordable homes, jobs, health and community facilities and other necessary infrastructure will have been provided in urban and rural areas to meet the needs of all sections of the population, creating <u>healthy, safe</u> and secure <u>low crime</u>, inclusive places and robust communities that promote good health and well-being, maintain independence and self-sufficiency and reduce social isolation</p>	To give clarity
E.35	3.8	<p>Amend paragraph to read: Residents and workers in urban and rural areas will have a reduced need to travel by private car with opportunities for “active travel” i.e. walking and cycling promoted, along with improved accessibility to public transport. In Hereford, congestion will be managed and public transport improved through a balanced package of transport measures including the provision of a relief road, park and ride <u>choose</u> facilities and bus priority schemes. Residents will have the opportunity to contribute to the shape of their local area through engagement in plan making</p>	To update the plan

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.36	3.12	Amend paragraph to read: Hereford will provide a strong, sub-regional shopping, employment, leisure and cultural focus for the county. Comprehensive proposals for regeneration in and around the city centre will complement the historic core in providing homes, jobs, shops and leisure facilities and transport improvements. As a result the city will be a vibrant destination of choice for shoppers and visitors alike. The market towns will contribute to the economic development of the county whilst being distinctive, thriving service centres that are better linked to their surrounding hinterland villages rural settlements through enterprise hubs, service provision and transport accessibility. Our village-based services will be supported through new development (including live/work units) in appropriate locations to foster sustainable communities and promote rural regeneration	To update the plan
E.37	3.16	The wording of paragraph 3.16 be amended as follows: “The area’s valued historic <u>heritage</u> and <u>significant</u> environmental resource, including its natural beauty and quality of landscape, biodiversity, geodiversity, built environment and cultural heritage will be protected, <u>conserved</u> and enhanced.....”	To provide a consistent approach throughout the document
E.38	Fig 3.1	The wording of objective 12 to be amended to read: To conserve, promote, utilise and enjoy our natural, built, historic <u>heritage</u> and cultural assets for the fullest benefits to the whole community by safeguarding the county’s current stock of <u>valued heritage</u> and <u>significant</u> environmental assets from loss and damage reversing negative trends, ensuring best condition and encouraging expansion, as well as appropriately managing future assets	To make the objective more comprehensive and in line with the NPPF
E.39	3.19	Amended text in penultimate sentence; In accordance with the outcomes of the Revised Preferred Options, combinations of strategic urban extensions are identified in the Core Strategy in Hereford and the market towns and smaller (non-strategic) sites will be identified in the Hereford Area Plan, other development plan documents <u>the Bromyard Development Plan, the Rural Areas Site Allocations Development Plan Document</u> and Neighbourhood Development Plans.	To update the plan

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.40	3.20	<p>Amend paragraph to read: The spatial strategy reflects the existing and future role and function of all settlements in Herefordshire. A hierarchy of settlements was identified through the consultations on Developing Options and Place Shaping Paper stages of production of the Core Strategy; with the majority of growth taking place in the urban areas of Hereford and the market towns at the highest level of the hierarchy. Following a revised methodology of the hierarchy below the market towns level after the Preferred Options stage, a more localised approach has identified <u>villages settlements</u> countywide where proportional levels of development may be acceptable. These are detailed in the Place Shaping section and include <u>villages settlements</u> considered sustainable due to their existing range of services, together with those settlements where some future development will offer the potential for them to become more sustainable, thus strengthening their role locally</p>	To update the plan
E.41	3.25	<p>Delete the whole paragraph: “Following the abolition of the West Midlands Regional Assembly and the fact that the adopted Regional Plan’s housing target only went up to 2026, the council decided to commission its own technical advice regarding housing need in the county to 2031. The study aimed to assess existing evidence and to recommend an appropriate level of growth over the whole plan period of the Core Strategy.”</p>	To update the plan
E.42	3.26	<p>Amend para 3.26 to read: The Core Strategy housing <u>provision</u> requirement in Policy SS2 is based on the recommendations of the independent research from the <i>Local Housing Requirements Studies (2011, 2012 and 2014)</i>. These reports provided evidence-based guidance on the future level of housing <u>needed</u> in the light of changing economic and social trends. <u>The provision of 16,500 homes over the period 2011 to 2031 will meet the objectively assessed need for the county set out in the 2014 study. They assessed alternative methodologies and recommended an approach based on realistic economic growth forecasts over the plan period.</u></p>	To update the plan

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E.43	3.28	<p>Amend Para 3.28 to read: "The Local Housing Requirements Study 2011 and 2012 set out principles to help guide the process of identifying an appropriate level of housing development, together with possible policy options. Economic scenarios were then applied based on forecasts of employment growth. This assessment and testing concluded that housing delivery for Herefordshire 2011-31 should be within a range of between 14,400 homes (720 per annum) and 18,000 (900 per annum). The council determined that a figure of around 16,500 dwellings would meet growth aspirations for housing and growth in the local economy and is deliverable. The level of housing provision proposed will support growth in the number of people in the working age population of around 7.7% thereby supporting economic growth. Such a level would go towards addressing the imbalance in the population structure of the county by providing an appropriate mix of housing including encouraging the building of new homes for people of working age and younger families. However, this is an issue which will also need to be addressed beyond 2031 in subsequent plans.</p>	To update the plan																																								
E.44	3.30	<p>Delete: The overall total number of new homes to be provided between 2011 and 2031 is 16,500. However, as a there are existing housing commitments (planning permissions) the actual amount required from April 2013 is less at 13,660</p>	To remove references which will become outdated																																								
E.45	Fig 3.4	<p>Delete Housing land supply position at 2013</p> <table border="1" data-bbox="997 712 1366 1832"> <thead> <tr> <th></th> <th>Strategic allocation</th> <th>Completed 2011-13</th> <th>Commitments 2013</th> <th>Residual target 2011-2031</th> </tr> </thead> <tbody> <tr> <td>Hereford</td> <td>6,500</td> <td>227</td> <td>916</td> <td>5,357</td> </tr> <tr> <td>Leominster</td> <td>2,300</td> <td>65</td> <td>453</td> <td>1,782</td> </tr> <tr> <td>Ross-on-Wye</td> <td>900</td> <td>54</td> <td>216</td> <td>630</td> </tr> <tr> <td>Leedbury</td> <td>800</td> <td>17</td> <td>35</td> <td>748</td> </tr> <tr> <td>Bremyard</td> <td>500</td> <td>1</td> <td>30</td> <td>469</td> </tr> <tr> <td>Kington</td> <td>200</td> <td>5</td> <td>24</td> <td>171</td> </tr> <tr> <td>Rural Areas</td> <td>5,300</td> <td>174</td> <td>623</td> <td>4,503</td> </tr> </tbody> </table>		Strategic allocation	Completed 2011-13	Commitments 2013	Residual target 2011-2031	Hereford	6,500	227	916	5,357	Leominster	2,300	65	453	1,782	Ross-on-Wye	900	54	216	630	Leedbury	800	17	35	748	Bremyard	500	1	30	469	Kington	200	5	24	171	Rural Areas	5,300	174	623	4,503	To remove references which will become outdated
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Rural Areas	5,300	174	623	4,503																																							

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		<table border="1"> <tr> <td>Total</td> <td>16,500</td> <td>543</td> <td>2,297</td> <td>13,660</td> </tr> </table> <p>Note: Figures are net dwelling commitments. Commitments are net commitments minus 5% reflecting lapsed permissions." Herefordshire Unitary Development Plan proposals without planning permission are not included within the Commitments 2013 totals (estimated at 646 dwellings). However, until the adoption of the Core Strategy they will remain as part of the adopted development plan.</p>	Total	16,500	543	2,297	13,660	
Total	16,500	543	2,297	13,660				
E.46	3.31	<p>Amend paragraph to read:</p> <p>More specific details of the strategic sites locations regarding house types, density and design are included in the Place-Shaping section and will be determined through master planning. The forthcoming Hereford Area Plan, the Bromyard Development Plan, the Rural Areas Site Allocations Development Plan Document and other Development Plan Documents and/or Neighbourhood Development Plans will identify non-strategic sites and will also consider the question of whether or not to define settlement boundaries in developing planning policies.</p>	To update the plan					
E.47	3.35	<p>Amend Para 3.35 to read:</p> <p>"The decision, at the Revised Preferred Option stage, to increase the level of housing development in rural areas from 4700 to 5300 was based on trying to be more locally responsive to the needs of all rural communities. The plan sought seeks to encourage new developments which supported and enhanced access to local services and tackled issues of rural housing affordability, giving consideration to the introduction of neighbourhood planning. The location and level of development allocated to villages settlements will subsequently be determined through the preparation of either a Rural Areas Site Allocations Development Plan Document Development Plan Documents or Neighbourhood Development Plans.</p>	To update the plan					

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.48	3.41	<p>Amend paragraph to read: In respect of the housing target for Herefordshire the expectation is that the highest rate of housing completions will be towards the latter end of the plan period. This is because:</p> <ul style="list-style-type: none"> a) The housing market in the county is depressed and completion rates are currently well below the rate required to achieve the overall target; b) The achievement of the revised strategy targets will be dependent upon achieving the required key elements of infrastructure for the county; and c) There are significant lead-in times needed before major housing sites can be developed. 	To remove unnecessary detail.
E.49	3.52	<p>Amend paragraph: Secondly, the approach is to work with developers, the Highways Agency and transport providers to improve transport infrastructure, connections and choices in our main centres and rural areas (where reliance on the private car is often the only option). This is particularly important for local journeys in Hereford where a balanced package of measures including more walking and cycling, bus transport and a western-Relief Road is needed in order to improve connectivity and travel choice, reduce congestion, enhance the public realm and foster local enterprise and tourism.</p>	To ensure consistent terminology is used.
E.50	3.58	<p>Delete last three sentences. Studies which examined the need for additional road infrastructure to serve the Hereford Enterprise Zone did not recommend inclusion of additional road links. Such a proposal is therefore not considered to be a reasonable option for inclusion in the Core Strategy. The explanation of policy HD6 includes more detail of this work.</p>	To remove reference to infrastructure not included in the Core Strategy.
E.51	3.63	<p>Insert new sentence at end of 3.63: Improved and expanded higher education provision in Herefordshire is envisaged as part of the strategy to help retain our young people and improve the skills base of the county. The place shaping policies and the general policy on community facilities will deliver this part of the strategy. Significant recent work has been undertaken to bring about the establishment of a university in Herefordshire. This proposal has widespread support in the Council, the wider community and with local businesses. The emerging proposal will do much to consolidate the role of Hereford as a traditional county town and which provides a vibrant and diverse range of services. Depending on</p>	To update the Plan.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.52	3.86	<p>the state of the project at that time there will be an opportunity for it to be included in greater detail in the Hereford Area Plan.</p> <p>Delete final two sentences.</p> <p>This will be further improved with the development of the Livestock Market retail-led mixed-use regeneration development. This represents the most significant retail scheme in the county for many years and by improving the range of shops and leisure facilities will make Hereford better able to compete with sub-regional centres outside the county, helping to retain the retail spend within Herefordshire.</p> <p>At end of retained third sentence add: “ and will consolidate the recent improvements in vitality following the opening of the Old Livestock Market retail/leisure scheme.</p>	To update the plan
E.53	3.88	<p>Delete first sentence</p> <p>The extent of the town centre is defined for Hereford and each market town in the place-shaping section</p>	To update the plan.
E.54	3.91	<p>Amend final sentence: These deliver Core Strategy objectives 6, 7, 8, <u>8a</u> and 9.</p>	To include reference to proposed new objective 8a.
E.55	3.92	<p>Amend paragraph to read:</p> <p>The strategy for improving environmental quality will support the creation of sustainable communities through protecting existing built, historic <u>heritage</u> and natural environmental assets, the better use of resources and addressing the causes and effects of climate change.</p>	To update the plan.
E.56	3.94	<p>Amend paragraph to read:</p> <p>The maintenance of the county's environmental quality and its improvement, where necessary, will be through the preservation, management and enhancement of its <u>environmental</u> assets and safeguarding the natural and cultural environment in an integrated way that supports the health and wellbeing of its inhabitants. Although the approach will be based upon addressing issues at a landscape scale, there will be instances where detailed features and assets should be conserved when they contribute to local distinctiveness</p>	To update the plan.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.57	3.96	Amend paragraph to read: In undertaking assessments, the values attached to local distinctiveness by communities can include social and economic perceptions as well as environmental characteristics. Where produced, local guidance should inform the design process. A series of documents <u>Supplementary Planning Documents</u> exist that provide <u>planning guidance and advice on both the natural and historic environment biodiversity, archaeology and landscape character</u> . Management plans have been prepared for both Areas of Outstanding Natural Beauty within the county and conservation objectives set for sites of international and national biodiversity interest.	To update the plan.
E.58	3.98	Amend paragraph to read: The strategic growth areas avoid locations at high risk of flooding wherever possible, to protect against loss of life and recurring damage to property. Flood alleviation measures will be used where flood avoidance is not possible. New development will provide for a range of type and size of sustainably constructed and well-designed buildings to reduce carbon dioxide emissions, <u>contribute to climate change adaptation</u> , enhance energy efficiency and respect local distinctiveness	To update the plan
E.59	3.101	Amend paragraph to read: New parks and green spaces in Hereford and the market towns will be delivered to provide facilities for recreation and sport, as well as <u>contributing to the local green infrastructure network</u> , promoting biodiversity and to enhance community health and well-being. Other, necessary new or enhanced community facilities including sustainable transport choices will be delivered in association with new development to improve access to services and reduce the need to travel long distances by private car. Relevant policies in the place shaping section and the general local distinctiveness policies will deliver this part of the strategy	To update the plan
E.60	3.103	Amend paragraph to read: Proposals for new/improved infrastructure to protect water quality, especially of the Rivers Wye and part of the Lugg which are European protected Special Areas of Conservation, will <u>need to</u> ensure the special features of these sites are maintained, despite the requirement for increased sewage treatment capacity from new development	To update the plan

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.61	3.110	Delete reference to "protecting the environment for its own sake" in Para 3.110 and replace with" "These comprise: protecting the environment for its own sake recognising the intrinsic character and beauty of the countryside; respecting local distinctiveness; funding new green infrastructure; and addressing the causes and impacts of climate change. These link to Core Strategy objectives 10, 11 and 12."	To comply with NPPF
E.62	3.111	Amend paragraphs to read: "To implement the spatial strategy, a delivery strategy is set out in the <i>Infrastructure Delivery Plan (IDP)</i> which accompanies the Core Strategy. This is supported by the Implementation, Monitoring and Delivery Plan in Appendix 3. It is split into distinct subject areas: <ul style="list-style-type: none"> ● Countywide infrastructure; ● Hereford; ● The market towns; ● The rural areas. 	To reflect the new Implementation, Monitoring and Delivery Plan and revised IDP from earlier stages.
E.63	3.112	Delete Paragraph: A description of the infrastructure projects being provided in each category and how the level of growth for each area will be delivered is set out in the supporting text to the IDP. More detailed proposals will come forward through the Hereford Area Plan, other Development Plan Documents and Neighbourhood Development Plans.	To reflect the new Implementation, Monitoring and Delivery Plan and revised IDP from earlier stages

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification										
E.64	3.114	Delete paragraph: Sustainability appraisal 3-114 The appraisal findings are set out in the <i>Sustainability Appraisal Report</i> . They state that the spatial strategy is likely to have a significant positive effect on the theme of built environment, but the overall effects on the themes of transport and access, resource consumption and climate change and the natural environment are mixed. The overall effect on education and employment themes and healthy and prosperous communities themes are minor positive. There were no recommendations for changes to policy wording as a result of the appraisal.	To update the Plan and avoid unnecessary text										
E.65	Key Diagram P49	Amendment to box "Distribution of homes and jobs" *** To be determined through Neighbourhood Bromyard Development Plan.	To update Key Diagram in respect of the Bromyard Development Plan.										
4.1. Hereford Place Shaping													
E.66	4.2.3	Amend final sentence: A western Relief Road will be key element to a congestion free city by enabling an alternative trunk route, providing additional highway capacity to implement sustainable transport measures and reducing the level of through traffic in the city centre	To update the plan										
E.67	Fig 4.1	Insert updated web address: http://factsandfigures.herefordshire.gov.uk/	To remove out of date references										
E.68	4.2.8	Delete paragraph and associated table 4-2.8 The table below shows the level of commitments and completions as at 1 April 2013 for Hereford. This leaves a residual requirement of 5,357 dwellings up to 2031. The strategic sites are expected to deliver around 3,300 new dwellings. The Hereford Area Plan will allocate dwellings on non-strategic sites to ensure that, with windfalls, the remaining housing requirement of around 2,057 will be achieved.	To remove out of date references										
		<table border="1"> <thead> <tr> <th>Strategic allocation</th> <th>Completed 2011-13</th> <th>Commitments 2013</th> <th>Strategic urban expansions</th> <th>Residual housing requirement</th> </tr> </thead> <tbody> <tr> <td>6,500</td> <td>227</td> <td>916</td> <td>3,300</td> <td>2,057</td> </tr> </tbody> </table>	Strategic allocation	Completed 2011-13	Commitments 2013	Strategic urban expansions	Residual housing requirement	6,500	227	916	3,300	2,057	
Strategic allocation	Completed 2011-13	Commitments 2013	Strategic urban expansions	Residual housing requirement									
6,500	227	916	3,300	2,057									

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.69	4.2.9	<p>Amend paragraph to read: Policies SS3 and Appendix 5 together with HD2, HD4, HD5 and HD6 and their explanatory text also set out the particular issues for each area and their infrastructure requirements. However the delivery of development under all these policies will require improvements to the water supply and waste water treatment systems. The water supply system for Hereford is served by two distinct systems, one from the north, and one from the south. In order to meet the planned growth, both the trunk water mains supplying the city will require upsizing. The cost of any upsizing of infrastructure, in advance of a water undertaker carrying out the work, will fall to developers through the requisitioning procedures of the water industry legislation. This will ensure there is an adequate supply of water brought into the city. There will also be a requirement for off-site mains extension from the trunk system to the proposed development. Hereford is served by two waste water treatment works, which will require further improvement works to serve the planned growth.</p>	<p>To ensure suitable cross referencing to other policies. To avoid unnecessary detail in the CS</p>
E.70	4.2.14	<p>Amend paragraph to read: The Core Strategy aims to improve Hereford's status as a sub-regional shopping destination by enhancing and improving existing facilities and integrating new development into the historic centre. The Eign Gate and Edgar Street regeneration areas are the focus for achieving this aim, and these areas will be defined in detail in the HAP. Development in the Edgar Street regeneration area will be developed in accordance with a masterplan to ensure the delivery of a high quality mixed use development. This will be informed by the existing masterplan which sets out an overarching vision of how the area will be developed and along with the <i>Infrastructure Delivery Plan</i> identifies the required supporting infrastructure to enable the successful delivery of the project.</p>	<p>To clarify the policy</p>

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.71	4.2.28	<p>Amend paragraph to read: Hereford's historic heritage must be treated <u>viewed</u> as a valuable asset as the city expands and changes. Development proposals will be expected to demonstrate how these <u>heritage assets, their significance and setting,</u> will be protected <u>conserved</u> and where appropriate enhanced. Hereford is fortunate to have a wealth of historic buildings, archaeological remains, historic streetscapes, such as Widemarsh Street and St Owens Street and open spaces, which provide valuable settings for historic buildings, for example; at the Cathedral Close and the plots of the adjoining Canons' houses. Within Hereford there is the nationally designated Hereford Area of Archaeological Importance (AAI). Additionally, opportunities exist to enhance the setting of existing heritage assets including the City Wall and Blackfriars Friary/Coningsby Hospital site. Public realm works to Newmarket Street and Blueschool Street will also provide the opportunity to improve the setting of the City Wall, an important historic asset</p>	To update the plan
E.72	4.2.30	<p>Amend paragraph to read: The <i>Town Centres Study Update 2012</i> confirms Hereford as the principal shopping centre within the county. Although the report acknowledges that Hereford has been affected by the downturn in the economy along with many other town centres in the United Kingdom, it finds that the city centre shows signs of resilience and its outlook is good. <u>The opening of the Old Market (2014) added to the</u> with the commitment for retail development at the former livestock market. The latter will add to the existing mix of national multiples and independent traders and will <u>strengthen</u>s Hereford's role as a principal centre, providing economic benefits and will help <u>reducing</u> unsustainable travel and retail expenditure leakage to other cities such as Worcester, Cheltenham, Bristol and Cardiff.</p>	To update the text.
E.73	4.2.32	<p>Delete sentence: Primary frontages are likely to comprise predominantly of retail uses, whilst secondary frontages will provide greater opportunity for a diversity of uses, such as restaurants and businesses.</p>	To remove unnecessary duplication.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.74	4.2.33	<p>Delete paragraph and replace with: Following the opening of the 'Old Market' (2014) the findings of the Town Centres Study Update 2012, indicates that opportunities remain for new retail development in the city centre, particularly within the Eign Street regeneration area. Therefore at the time of adoption there is no need to allocate additional development sites for retail or other uses within the city. However this situation will be reassessed when the Hereford Area Plan is produced. The Hereford Area Plan will also provide an opportunity to reconsider the extent of the town centre and primary and secondary retail frontages</p> <p>Most of the expanded shopping area of Hereford will take place at the old livestock market and Eign Gate area, which together have the potential for accommodating substantial growth. This approach is confirmed by the Town Centres Study Update 2012, which indicates that, in addition to the former livestock market, opportunities remain for new retail development in the city centre, particularly within the Eign Street regeneration area. There is therefore no need to allocate additional development sites for retail or other uses within the city. However this situation will be reassessed when the Hereford Area Plan is produced. The Hereford Area Plan will also provide an opportunity to reconsider the extent of the town centre and primary and secondary retail frontages.</p>	Revised text to reflect the Old Market opening
E.75	4.2.34	<p>Delete paragraph: Regeneration of the former livestock market brownfield site, which is currently underway, will provide a mix of unit sizes including larger units to attract high street multiples (including a department store) that are not currently available in the city centre. Whilst the use of public transport will be encouraged through the provision of a public transport hub; additional car parking will be provided as part of the livestock market redevelopment. Successful integration with the existing historic retail core will be achieved through the creation of new pedestrian friendly links. Measures to further improve and enhance the existing city centre's shopping facilities will be supported</p>	To update the text.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.76	4.2.35	Amend paragraph to read: Tourism plays an important role in Hereford's economy and it will be promoted through the planned mixed-use regeneration of the city. Opportunities to attract more tourists, who make an important contribution to the local economy, will be supported where appropriate. The business tourism potential can be further developed through the promotion of new meeting/conferencing facilities, which make better use of existing assets, such as the Courtyard Theatre for example. The <i>Marches Hotel Study (2012)</i> identifies capacity for <u>a premium style new hotels as well as</u> and the potential for the redevelopment and/or extension of existing hotels. This study concludes that there is no need for further budget hotels in Hereford within the plan period. Opportunities to promote tourism and recreation activities on the River Wye in Hereford will be encouraged where they are in accordance with policy E4 on Tourism.	To remove unnecessary text and clarify the policy.
E.77	4.2.36	Amend paragraph to read: The development of the former livestock market will include; a new multi-screen cinema, restaurants and cafes, whilst Opportunities will be facilitated through the Core Strategy and Hereford Area Plan for other leisure and tourism uses within the extended city centre to complement existing facilities.	To reflect the fact that the Old Market has opened
E.78	4.2.39	Amend paragraph to read: Facilitating access and maximising connectivity within the city by all transport modes is essential to reduce congestion, support future prosperity and enable growth within Hereford. The <i>Local Transport Plan (2013/14 – 2014/15)</i> outlines approaches for improving transport within the city. It also identifies the requirement for a Hereford Transport Review to inform the long-term transport strategy for the city. <u>The Core Strategy is complemented and supported by the Local Transport Plan within the city on the basis of a transport strategy for Hereford .</u>	To clarify the relationship between the CS and the LTP/Hereford Transport Plan
E.79	4.2.41	Delete paragraph: The future Hereford Transport Review will identify the schemes to be included within this transport package and establish a long-term transport strategy for Hereford, including a programme of infrastructure and services to facilitate the growth proposals identified in the Core Strategy	To remove duplication and out-of-date information

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.80	4.2.44	Delete paragraph: Herefordshire Council is continuing to develop its evidence base by undertaking a refresh of its transport forecasts and understanding of future transport conditions, including the effects of the development contained in the Core Strategy	To remove duplication and out-of-date information.
E.81	4.2.45	Amend paragraph: The Hereford Transport Review will establish a transport strategy for Hereford and will include a systematic and in-depth review of current and future transport conditions. The outcomes of this review will be a costed, phased programme of infrastructure and services over the Core Strategy period to facilitate growth proposals. The review will identify and test a range of transport packages. In addition to the proposals outlined in policy HD3 above the packages are likely to include: Strategy includes a programme of infrastructure and services to facilitate growth proposals including: <ul style="list-style-type: none"> • real time information on core bus network and stop upgrades; • active travel network; • extension of Destination Hereford project; • Hereford transport hub; • city centre refurbishments; • bus priority measures; • rail track and signal improvements between Hereford and Malvern; and • facilities to support electric and low carbon vehicles. Particular transport infrastructure necessary to bring forward the Core Strategy proposals are detailed in the <i>Infrastructure Delivery Plan</i> .	To bring the Core Strategy up-to-date.
E.82	4.2.46	Amend paragraph: A key element of the long-term Hereford transport strategy is the requirement for a Relief Road with a second river crossing. This vital addition to the city's transport network will enable the reallocation of existing highway for bus priorities and walking and cycling measures and the re-routing of the existing A49 Trunk Road (managed by the Highways Agency) removing longer distance traffic from the centre of the city	To ensure consistent terminology is used.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.83	4.2.47	Capitalise "Relief Road" in second sentence.	To ensure consistent terminology is used.
E.84	4.2.49	Amend paragraph to read: The first section of the Relief Road to be constructed is likely to be the section between the A49 and A465, as part of the South Wye Transport Package (as identified in the <i>Local Transport Plan</i>). The second section will link the A465 and the A4103 and includes a bridge crossing of the Wye. (A465-A4103). This section will be co-ordinated with the development delivery of the Western Urban Expansion proposals at Three Elms. The final section would link the A4103 to the western and eastern sides of the A49 in the north of Hereford. Costs of the link sections are highlighted within the study. Other sources of funding and timings of delivery are set out in the <i>Infrastructure Delivery Plan</i> , which accompanies this document. The <i>Economic Viability Assessment 2013</i> explains the viability of the project and other proposals in the plan generally	To clarify the Core Strategy. To remove unnecessary references and ensure consistent terminology and avoid unnecessary detail
E.85	4.2.50	Amend paragraph to read: Work on the Detailed alignment of the road will be considered during shown in the Hereford Area Plan. Close working with key statutory stakeholders and any necessary assessments will be undertaken in preparing the HAP and subsequent planning applications bodies will be needed to ensure the avoidance of impact on natural assets and appropriate identification of mitigation measures, particularly in relation to impacts from physical damage/loss of habitat, noise pollution and vibration, light pollution, air pollution and water quality on the River Wye SAC. The design and exact location of the proposals will need to fully take account of flood risk to ensure no detriment to third parties. Regard should also be had to any impact on Source Protection Zones. Consideration of the impacts on the historic environment will also be required with particular regard being paid to any designated heritage assets, including their significance and setting, archaeological interest and as well as the historic character of the wider landscape.	To ensure the appropriate processes are followed. To ensure consistent terminology.
E.86	4.2.51	Capitalise "Relief Road".	To ensure consistent terminology is used.
E.87	4.2.54	Amend paragraph to read: The expansion area referred to as Holmer West will be planned on a comprehensive basis. informed by a development brief prepared through the Hereford Area Plan. This will include variations in layout, density and design to achieve a form and character to the development that respects the landscape sensitivity, and existing natural and historic features of the area.	To confirm the need to plan the development on a comprehensive basis

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.88	4.2.56	Amend paragraph to read: The new area will be required to encourage sustainable modes of travel and discourage car use. It will be primarily accessed from Roman Road with the option of a further access link to the northern Hereford Relief Road corridor and Park and Ride Choose. The scheme will be reliant on walking and cycling routes and bus priority to access the city and existing community facilities.	To clarify the policy approach to supporting transport and movement modes.
E.89	4.2.57	Amend paragraph to read: A Park and Ride Choose site is planned on part of the northern expansion area, alongside the A49, which will work in combination with the proposed western and southern Park and Ride facilities. These Park and Ride areas will also have the ability to be Park and Car Share stops and Park and Cycle points, so that their full potential in reducing private car use within the city can be realised. The design and siting of the Park and Ride Choose should take into account any impact on the landscape	To clarify the policy approach to supporting transport and movement modes.
E.90	4.2.59	Amend paragraph to read: Listed buildings and a Scheduled Ancient Monument at St Bartholomew's Church and Holmer House lie to the east of the expansion area. New development should be designed to ensure that the impacts on the significance and the setting of these heritage assets are minimised and that opportunities for enhancement are pursued and regard should be had to the Herefordshire Historic Land Characterisation project. There is potential for significant buried archaeological remains to survive within this area as parts are of it are adjacent to the Roman Road and aerial photographs indicate the presence of former settlements here. Earthworks also indicate the presence of medieval settlements	To update the plan
E.91	4.2.61	Amend paragraph to read: Appropriate community facilities will be provided within the area to support the identified need to support the new development. Contributions will be sought where appropriate for primary and secondary education facilities in order to accommodate children living in the expansion area. There will also be a need for contribution towards expanded pre-school provision within existing primary schools or the provision of a new pre-school facility as part of the expansion area.	To confirm the basis on which developer contributions will be sought.
E.92	4.2.72	Capitalise "Relief Road".	To ensure consistent terminology is used.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.93	4.2.73	<p>Amend paragraph to read: The development will also include a transport interchange area with capacity for around 150 spaces Park and Choose site with <u>and</u> ancillary facilities such as secure cycle lock ups. In the short to medium term, this will be used as a "Park and Share" and "Park and Cycle" hub but longer term, the site may also be a Park and Ride site to complement the principal Park and Ride sites north and south of the city</p>	To clarify the policy approach to supporting transport and movement modes.
E.94	4.2.78	<p>Delete paragraph and replace with: <u>210 primary school places will be required to meet the educational needs of the new population generated by the development</u> A new 210 place primary school will be required to meet the educational needs of the new population generated by the development and a deficit in capacity within existing schools in the north west of the city. This should be centrally located close to the existing high school to create a community and education hub to the development. If pre-school provision is not delivered as part of the community hub, this will need to be provided as part of the new primary school.</p>	To clarify the policy approach to supporting education provision
E.95	4.2.80	<p>Amend paragraph to read: The Yazor Brook corridor is designated as floodplain which also extends to a wider land area at the eastern end of the expansion area. The <i>Water Cycle Study</i> and the <i>Strategic Flood Risk Assessment</i> have highlighted that a strategy to address both the sustainable management of new surface water discharges from the urban extension and measures to mitigate against fluvial flood risk will be required. This is likely to encompass surface water attenuation features which will be an integral part of the development and will provide opportunities for biodiversity enhancement. A detailed flood risk assessment will be required to address these issues. Yazor Brook is also an existing source of flooding to properties, community facilities and highway infrastructure east of the expansion area and the development will also need to include measures to assist in reducing this existing flood risk, <u>in accordance with national policy and technical guidance on the management of flood risk.</u> The area suffers from low water pressure and therefore an upgrade to the mains water supply to serve the area may be required. With regard to the Whitecross High School expansion, flood management and mitigation will also be required. Opportunities to utilise existing and new playing fields for flood betterment will be explored.</p>	To clarify the policy.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.96	4.2.90	Amend paragraph to read: As part of the development, a southern Park and Ride <u>Choose</u> site is required in the vicinity of the A49/Rotherwas Access Road roundabout to complement those proposed north and west of the city aside other expansion locations. These Park and Ride areas should also have the ability to be Park and Car Share hubs, and Park and Cycle to achieve their full potential in reducing private car use within the city. Provision will also need to be included for a small parking area to serve the country park. The design and siting of the Park and Ride should take into account any impact on the landscape.	To clarify the policy approach to supporting transport and movement modes.
E.97	HD7	Policy HD7 – Hereford Employment Provision Hereford will continue to provide focus for employment provision in the county. Employment supply at Hereford will be delivered through: <ul style="list-style-type: none"> the expansion of the city centre as part of wider city regeneration which will include commercial uses including new office provision and creating a better environment for existing businesses. Proposals for office uses outside of the city centre will be subject to the sequential test, as set out in paragraph 24 of the NPPE; continuing development of employment land at Hereford Enterprise Zone at Rotherwas to strengthen the enterprise zone, with particular focus on defence and knowledge sectors, creating added benefit for companies who locate in the area; encouraging small scale environmental and knowledge based employment development opportunities; and provision of new areas of employment land particularly through the development of strategic urban extensions. 	To provide clarity.
E.98	4.2.103	Delete sentence: Following designation, studies were commissioned to examine the possible benefits of additional road infrastructure to serve the Enterprise Zone. However, the reports, which considered the economic, wider social and traffic impacts of an eastern link road from the Enterprise Zone to the A438 Ledbury Road, recommended against the inclusion of such a link in the Core Strategy	To delete unnecessary text from the Plan.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.99	4.2.107	<p>Amend paragraph to read: Although this business park is located 7km north of Hereford, it is one of the county's largest employment sites and is sufficiently close to Hereford to assist in meeting the current and future employment needs. This site presently comprises 60,000 m² of predominantly B1 and B8 floorspace, although a planning permission has been granted application is currently being considered for around a further 51,000 m² of mixed B1, B2 and B8 floorspace, totalling an additional 21 hectares. The site is rated as 'good' in the <i>Employment Land Study 2012</i> and if the current application is approved, the site will offer a diverse range of new employment opportunities.</p>	<p>To update text. To remove unnecessary text from the Plan.</p>
4.3 Bromyard Place Shaping			
E.100	4.3.1	<p>Amend paragraph to read: As part of the vision for Herefordshire, Bromyard will continue to fulfil a diverse range of important roles as a focus for residential, employment, recreational and cultural uses. The town will continue to act as a service centre for its hinterland <u>the surrounding rural area</u>. The strategy promotes the continued development of the town, taking into consideration its needs, opportunities and constraints. This vision is manifested in strategic objectives 1, 4, 6, 8 and 10, which for Bromyard, centre on meeting housing need (including affordable housing), reducing the need to travel, facilitating employment generation and diversification and improving delivery and access to services. The spatial strategy for Bromyard is balanced against its unique needs, opportunities and constraints which are represented in the town profile map in Figure 4.4.</p>	<p>To ensure use of consistent terminology throughout the plan.</p>
E.101	Fig 4.4	<p>Delete source reference: "http://factsandfigures.herefordshire.gov.uk/youarea.aspx" and replace with: "http://factsandfigures.herefordshire.gov.uk/ "</p>	<p>To ensure that source references in the plan are up to date.</p>

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.102	4.3.2	Amend paragraph to read: To achieve the vision for Bromyard, a strategic urban extension for residential development is proposed in the north west area of the town. In addition, new employment land of around 5 hectares will be identified through a Neighbourhood Bromyard Development Plan . The proposed housing at Hardwick Bank is located on mainly 'high' and 'medium-high' sensitivity landscape according to the Urban Fringe Sensitivity Analysis 2010. High landscape constraints are predominant all around Bromyard and flooding issues also constrain development to the east of the town. The environmental constraints of Bromyard must be balanced with the need for new development. The spatial strategy proposes to direct some development to Bromyard to support its service centre role, meet local housing needs and provide further employment opportunities for the local community. Policies BY1 and BY2 set out how the spatial strategy for Bromyard will be delivered and managed and are illustrated in the Bromyard Key Diagram – Figure 4.5.	To respond to the fact that the Town Council has decided not to produce a Bromyard Neighbourhood Plan. Proposals for Herefordshire Council to produce Bromyard Development Plan are now included in revisions to the Local Development Scheme.
E.103	Fig 4.5	Delete reference on map as follows: New employment site to be delivered through the Neighbourhood Bromyard Development Plan.	To avoid any misunderstanding about the potential location of future employment land.
E.104	4.3.7	Amend paragraph to read: The new development should have a network of cycle ways and footpaths that are easily accessible and connect with the town centre, existing employment sites, community facilities and the surrounding countryside. This is particularly important given the peripheral location of the development area. Car parking will be addressed through the Bromyard Area Plan a Neighbourhood Development Plan and/or other Development Plan Documents.	To respond to the fact that there is no further intention to progress with a Bromyard Neighbourhood Plan. In the absence of such a Plan the Council is committed to drafting a Bromyard Development Plan for the town.
4.2. Kington Place shaping			
E.105	Fig 4.7	Delete source reference: “ http://factsandfigures.herefordshire.gov.uk/yourarea.aspx ” and replace with: “ http://factsandfigures.herefordshire.gov.uk/ ”	To ensure that source references in the plan are up to date.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
4.3. Ledbury Place Shaping			
E.106	Fig 4.9	Amend source text at bottom of Fig 4.9 to read: http://factsandfigures.herefordshire.gov.uk/yourarea.aspx	To update web link address
E.107	4.5.3	Amend last sentence "The remaining housing requirement for Ledbury will be delivered through existing commitments, windfalls and/or the allocation of sites through either a Neighbourhood Development Plan and/or other Development Plan Documents."	To update the Plan.
E.108	4.5.5	Delete last part of first sentence: "Land north of the viaduct will also include around 3 hectares of employment land (in addition to any existing commitments), which will be restricted to use class B1 (light industry, offices, research and development) in order to complement the larger employment area and to safeguard residential amenity. By requiring this to be located along the boundary with the existing industrial estate, this will act as a noise buffer between the new housing and existing businesses. Small-scale sites for employment use will also be identified through a Neighbourhood Development Plan and/or other Development Plan Documents."	As a consequential change to bullet 2 of Policy LB2
E.109	4.5.6	Amend third sentence: "New employment land and other policies in the Core Strategy, as well as the forthcoming Neighbourhood Development Plan or other Development Plan Documents, will also promote local employment opportunities."	To update and to remove unnecessary text
E.110	4.5.8	Amend paragraph to read: The issue of car parking supply and demand at the railway station and in the town centre will be addressed through a Neighbourhood Development Plan and/or other Development Plan Documents	To update and to remove unnecessary text
E.111	4.5.10	Amend paragraph to read: A review of open space needs and existing designations in Ledbury will be undertaken as part of a Neighbourhood Development Plan and/or other Development Plan Documents.	To update and to remove unnecessary text

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.112	4.5.13	Amend paragraph to read: A landmark feature of Ledbury is its railway viaduct which is Grade II listed. Any development of the viaduct site will need to respect the setting <u>and significance</u> of the viaduct, yet regard it as a positive feature to be integrated within, and inform the detailed master planning and design of, any scheme.	To comply with the wording of the NPPF.
E.113	4.5.15	Amend last sentence: The need highlighted in the <i>Town Centres Study Update 2012</i> will be reviewed regularly against expenditure capacity and the identification of any specific proposals to meet the needs <u>may</u> will be considered through a Neighbourhood Development Plan and/or other Development Plan Documents.	To update and to remove unnecessary text
4.4. Leominster Place Shaping			
E.114	4.6.1	Amend paragraph to read: Leominster, as the main centre in the north of the county, will continue to fulfil a diverse range of important roles as a centre for residential, employment, cultural, retail, tourism and recreational uses. Leominster will continue to act as a service centre to its rural hinterland <u>the surrounding rural areas</u> . This strategy seeks to promote the continued development of the town, taking into consideration its needs, opportunities and constraints.	To ensure consistent terminology throughout the plan.
E.115	Fig 4.12	Insert updated web address: http://factsandfigures.herefordshire.gov.uk/	To remove out of date references
E.116	4.6.3	Amend paragraph to read: Residential development is proposed to the south-west of the town. The decision to focus the largest single strategic allocation of new homes to Leominster has been based on the recognition of its economic importance located on the A49 corridor; that it is the least constrained market town; its good public transport links, including the railway station; and that an urban extension will bring transport benefits in the form of a southern-link <u>relief</u> road. The latter will benefit the centre of the town in terms of reducing congestion and improving air quality.	To clarify the purpose of the road
E.117	Figure 4.13	Amend label for new road: Southern-Link <u>Relief Road Corridor</u>	To ensure consistent terminology.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.118	4.6.6	Third sentence: An appropriate mix of housing will be needed, informed by the <u>most up to date Local Housing Market Assessment</u> , in order to meet the needs of all sections of the community including housing for older persons. a need highlighted in the study of the Housing and Support needs of Older People in Herefordshire 2012."	Additional text to provide clarification. Deletion to remove unnecessary text.
E.119	4.6.9	Delete: Detailed Planning permission has previously been granted for 425 dwellings at Barons Cross Camp, Cholstrey Road. This brownfield site was an allocation under the Herefordshire Unitary Development Plan and is considered appropriate to be delivered during the plan period. The remaining non-strategic housing in Leominster will be provided through smaller scale sites within the built-up area in accordance with additional requirements and will be delivered through a Neighbourhood Development Plan and/or other Development Plan Documents	Delete to remove unnecessary and out of date text.
E.120	4.6.11	Amend paragraph to read: Previous studies have indicated that the The Bargates area of the town suffers from congestion and without new road infrastructure the potential growth of Leominster would be limited. In addition, the Bargates area is also designated as an Air Quality Management Area as a result of poor air quality and new road infrastructure would enable much of the heavy vehicular traffic to be diverted from this area.	To remove unnecessary text.
E.121	4.6.12	Amend paragraph to read: The urban extension provides the opportunity to provide new road infrastructure as an integral element of the development. A link relief road connecting the Worcester Road roundabout to the A44 at Baron's Cross will be constructed. Much of the link from the B4361 Hereford Road to the Worcester Road roundabout has already been constructed, with a small area of approximately 200 yards needed to complete the link. The entire link relief road will be designed to provide an alternative direct and more convenient route for vehicles and avoid the need for through traffic to pass through the town centre, and in particular, the Bargates junction. The link relief road is also likely to require new roundabout junctions on the B4361 and A44 and an extension of the highway infrastructure in the south west corner of the Enterprise Park.	To ensure consistent terminology is used throughout the plan.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.122	4.6.17	The provision of a new combined infant and junior school is currently under consideration to replace existing provision in the town. This new school will provide up to 630 places which meets the current need. However, the additional housing provided by the urban extension will place create a need for a new primary school of up to 420 places primary school places. In addition, there will be a need for a children's centre for the early years which could form part of the community hub. In terms of high school places, the Earl Mortimer College has adequate capacity to cover the new growth of the town. These new facilities will help create a more sustainable community."	To remove unnecessary text from the plan.
E.123	4.6.18	Amend second sentence: Archaeological potential has been identified, in Leominster, particularly at land south of Barons Cross where there are earthworks. The proposed route of the southern link relief road needs full assessment prior to any works taking place on the south west extension. The Sustainability Appraisal highlighted that any archaeological concern on the proposed site needed to be addressed, this will be done at the master planning stage through and detailed field evaluation will be required.	To ensure consistent terminology throughout the plan. To remove unnecessary text.
E.124	4.6.19	Amend final sentence: "It may also be appropriate to consider small scale convenience retail to be provided within the urban extension to meet the day to day needs of the residents of the new development."	To better reflect the wording of Policy LO2
E.125	4.6.23	Rename the title of this section as follows: "Surface water management, <u>water quality</u> and fluvial flooding"	To update the plan and for clarity
4.5. Ross on Wye Place Shaping			
E.126	Figure 4.15	Insert updated web address: http://factsandfigures.herefordshire.gov.uk/	To remove out of date references

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.127	4.7.9	Amend paragraph to read: The continuation of the Unitary Development Plan The policy to deliver employment land to the north of the strategic housing location at Model Farm, will help facilitate greater employment opportunities for the residents of Ross-on-Wye. This employment area is located at an important entrance to the town and consists of a farm and surrounding agricultural fields with a field buffer to the nearby residential area to the west. A high quality development for B1, B2 and B8 uses will be accommodated, which should include appropriate landscaping to form a key element of any proposal to provide <u>providing</u> an appropriate eastern edge which is open to long distance views	To bring the document up to date by removing reference to the UDP and to correct punctuation.
E.128	4.7.10	Amend first sentence to read: The developer of the <u>Model Farm</u> area..	For clarity
Rural Areas			
E.129	4.8.1	The council's strategy for the rural areas outside of Hereford and the market towns recognises the many challenges in securing their long term future in a sustainable manner. The concept of sustainability is based upon a range of social, economic and environmental factors which includes the presence of employment, market and affordable housing, facilities and services, access to sustainable transport, as well as intangible factors such as social fabric reflecting community cohesion, interdependence and commitment.	To remove unnecessary text.
E.130	4.8.2	Sustainable development is about positive growth, and therefore gains in these three dimensions of <u>improved sustainability</u> are <u>is</u> central to achieving a strong living and working rural Herefordshire and meeting objectives 1, 5, 8, <u>8a</u> , 10 and 12 of the Core Strategy.	To improve clarity of text and to include reference to proposed new objective 8a.
E.131	4.8.3	To achieve this aim, the rural policies seek to enhance the role the county's rural <u>areas</u> villages have traditionally played as accessible, sustainable centres for their rural catchments. Therefore the	For clarity and consistency. The word 'village' will be replaced

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.132	4.8.4	positive growth of existing villages settlements through the development of appropriate rural businesses and housing, including affordable housing, that contributes towards maintaining their maintenance and strengthening these centres as hives of activity both socially and economically will be supported.	with 'settlement' where necessary.
E.133	4.8.5	Within this large, predominantly rural county, it is apparent that different areas of Herefordshire have their own identities shaped by a variety of factors and affinities that have evolved through time. A significant aspect of this geography contributing to a particular local character is the settlement pattern. As the pattern of rural settlements varies, a more localised approach to the rural areas has been developed for the Core Strategy.	To add clarity to text
E.134	4.8.7	This The approach adopted builds upon work undertaken on Housing Market Areas (HMAs) through the Strategic Housing Market Assessment 2008, Herefordshire Local Housing Market Assessment 2013 and Local Housing Requirement Study 2012. These assessments of Herefordshire's housing market have identified that there are spatial variations, it varies spatially and the The county can be divided in to seven areas based upon common housing market characteristics including tenure, house type profile, incomes and affordability, and house prices. , as well as it also reflects geographical proximity, patterns of household movement (migration) and travel to work patterns. that demonstrate the functional relationship between where people live and work. The seven geographical areas identified are the Housing Market Areas of Herefordshire, which are illustrated in Figure 4.18.	To add clarity to text
E.135	4.8.8	Herefordshire's seven HMAs are broadly focused on Hereford and the market towns (except for the Golden Valley) and utilise ward boundaries. (within which parishes sit). The approach to rural areas has been undertaken on the basis of an analysis of the rural element of each HMA only. The term 'rural HMAs' used in this section refers only to these the rural parts of the defined HMAs. Changes to the electoral wards in Herefordshire in 2015 may result in the need to amend the boundaries of the Housing Market Areas. Delete: The council is proposing that approximately 5,300 houses should be developed across all rural	Text is superfluous

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification												
E.136	Fig 4.19	<p>HMA's during the plan period. This county wide rural housing figure can be broken down by rural HMA, informing a set of indicative housing targets which relate to the future housing needs and requirements of the different areas and rural communities of the county.</p> <p>Delete table:</p> <table border="1"> <thead> <tr> <th>Rural housing 2011 – 2031</th> <th>Dwelling numbers</th> </tr> </thead> <tbody> <tr> <td>Rural housing completions 2011 – 2013</td> <td>174 (net)</td> </tr> <tr> <td>Rural housing commitments as at April 2014</td> <td>623 (net)</td> </tr> <tr> <td>Windfall allowance 2014 – 2031</td> <td>900</td> </tr> <tr> <td>Sites enabled through Neighbourhood Developments Plans or other Development Plan Documents</td> <td>3603</td> </tr> <tr> <td>Total 2011 – 2031</td> <td>5300</td> </tr> </tbody> </table>	Rural housing 2011 – 2031	Dwelling numbers	Rural housing completions 2011 – 2013	174 (net)	Rural housing commitments as at April 2014	623 (net)	Windfall allowance 2014 – 2031	900	Sites enabled through Neighbourhood Developments Plans or other Development Plan Documents	3603	Total 2011 – 2031	5300	Table will become out of date. Information will be reflected in the AMR
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E.137	4.8.10	<p>Amend last sentence:</p> <p>There is clear evidence over many years that such sites have delivered an important element of the county's housing supply and as such a modest windfall allowance for rural areas has been included of 1000 dwellings (50 per annum).</p>	To add clarity to text												
E.138	4.8.12	<p>"The Rural Housing Background Paper (March 2013) sets out in its Appendix 2 the assessment of each rural HMA undertaken, together with village data (including figures for the number of dwellings in each village core). The data is representative of a point in time and will be subject to review during the plan period. This document will be a useful reference for parish councils producing Neighbourhood Development Plans. Whilst parish councils engaged in the neighbourhood planning process can utilise the Core Strategy evidence base, through gathering their own additional locality based evidence they may develop their own policies and proposals for</p>	To remove superfluous text.												

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.139	Paragraph 4.8.13 above 4.8.14)	the sustainable development of an area which deliver the Core Strategy's strategic objectives in a locally focused way". The housing growth target for the villages of each HMA will assist in informing the preparation of emerging Neighbourhood Development Plans to enable communities to develop locally focused policy approaches on the scale and location of residential development in their area, in general conformity with the Core Strategy. Whilst Neighbourhood Development Plans need to be clear on how they fit with countywide strategic policies, communities should see this target as indicative and not the sole measure of general conformity. Housing policies and proposals (including allocations) in Neighbourhood Development Plans will need to be minded to the target and local evidence, being able to clearly explain the rationale for any difference	Note: Error in para numbering- duplicate paragraphs 4.8.13. To remove superfluous text.
E.140	4.8.15	It is envisaged that this strategy will lead to many small scale residential developments where the proposal is championed by the community with clear community and environmental benefits. It is also anticipated that this approach together with the application of affordable housing policies (H1 and H2) will lead to an increase in the provision of affordable housing across all rural areas	To remove superfluous text.
E.141	4.8.16	Housing in Herefordshire's villages/settlements 4.8.16 National policy supports a sustainable approach to development in rural areas which is locally responsive, reflecting local housing needs with an emphasis being on supporting services, employment and facilities in villages, avoiding new isolated homes in the countryside.	To ensure consistent terminology
E.142	4.8.17	Acknowledging the county's variety of rural neighbourhoods and that the different characters of the rural HMAs are seen in their village communities, a more localised assessment of each rural HMA has been undertaken to inform how rural housing will be distributed. The process of this assessment is fully set out in the <i>Rural Housing Background Paper March 2013</i> .	Text is superfluous
E.143	4.8.21	Given the importance of the Herefordshire landscape, and particularly the Malvern Hills and Wye Valley Areas of Outstanding Natural Beauty ¹ , new dwellings should make a positive contribution to their rural landscape by being built to a high standard, incorporating appropriate materials and landscaping. High quality design that is sustainable and reinforces the locally distinctive vernacular will be <u>particularly encouraged</u> . Innovative and/or contemporary design will also be supported	To add clarity to text

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.144	4.8.23	<p>where it is appropriate to the <u>its</u> context, <u>it</u> makes a positive contribution to the architectural <u>character diversity</u> of the locality and achieves high levels of sustainability in terms of energy and water efficiency, as set out in Policy SD1. All residential development proposals will need to consider the capacity of the drainage network in the area and the impact of future development on water quality in accordance with Policy SD4.”</p> <p>Where a Neighbourhood Development Plan exists, residential developments will have community support if the proposal is in conformity with their plan. Developers advancing proposals in the absence of a Neighbourhood Development Plan should ensure early engagement with the local community, including the parish council is undertaken. The results of any community consultation should be incorporated within the planning application; referencing how the development contributes to meeting community needs and ambitions</p>	Text is superfluous
E.145	4.8.24	<p><u>Housing a</u>Affordability is a <u>significant</u> issue in rural Herefordshire. <u>due to the relationship between house prices and incomes</u>. This situation is exacerbated by an existing housing mix that is heavily skewed towards higher value properties, together with demand from people moving to rural areas and restricted scope for new house building. As a result there is a need for market housing priced at a level that can be afforded by local people.</p>	To add clarity to text
E.146	Fig 4.20	<p>Amend: ‘Figure 4.20: The <u>villages settlements</u> which <u>will be</u> are the main focus of proportionate housing development’</p>	For consistency the word ‘village’ will be removed from the Plan and replaced with ‘settlement’ where necessary.
E.147	Fig 4.21	<p>Figure 4.21: <u>Villages where housing development will be restricted to market homes which meet the needs of people with local connections or affordable housing. Other settlements where proportionate housing is appropriate.</u></p>	For consistency the word ‘village’ will be removed from the Plan and replaced with ‘settlement’ where necessary.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
		Amend following within Fig 4.21 list <u>Brierton Breinton</u>	Factual correction
E.148	4.8.31	All residential development proposals will need to consider the <u>take account of</u> capacity of the drainage network in the area and the impact of future development on water quality in accordance with Policy SD4.	To add clarity to text
E.149	4.8.32	Amend final sentence: The need to make an exception to the general policy approach to development in the countryside in order to meet the requirements of rural businesses has long been recognised and this approach to rural workers has been endorsed by the National Planning Policy Framework (2013 <u>2012</u>)	Factual correction to text
E.150	4.8.33	Amend last sentence: 'The sustainability of the business will be scrutinised to ensure any essential need established can be sustained so the exceptions <u>criteria</u> set out in Policy RA4 are not abused. undermining the overall approach and leading to sporadic, isolated development in Herefordshire's countryside '	To remove superfluous text.
E.151	4.8.34	Amend first sentence: ' Thus <u>Therefore</u> , in terms of agricultural or forestry dwellings it will be essential to firstly establish that stated intentions to engage in agriculture are <u>soundly-based</u> genuine , reasonably likely to materialise and capable of being sustained for a reasonable period of time.'	To add clarity to text
E.152	4.8.43	Redundant rural buildings in Herefordshire vary greatly in terms of scale, design and materials depending on their original use. Some are situated within villages, but the majority are located in the countryside. They may occasionally be single buildings but more commonly are grouped together in farmsteads or other clusters. Others are former agricultural buildings which are no longer required for their original purpose. Others may relate to different activities such as corn mills or other industrial buildings. Most of these buildings have heritage value and are referred to in the policy as 'heritage assets'. Herefordshire has some 3,000 historic farmsteads which can potentially	To remove superfluous text.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.153	4.8.44	<p>contribute to promoting and improving a diverse rural economy. Herefordshire's historic farmsteads vary widely in scale and form and make an important contribution to the county's built heritage, landscape character and sense of local distinctiveness. Of particular significance is the high proportion of farmsteads that retain all or much of their historic character. Changing farming practices have made many traditional farm buildings redundant and finding a suitable alternative use which preserves their character and the integrity of the farmstead grouping is one way to secure their survival. Where planning permission is required proposals for the re-use of farmsteads should be informed by an assessment of the farmstead as a whole, including its landscape setting, character, significance and sensitivity to and potential for change. This assessment should have regard to the <i>West Midlands Farmsteads and Landscape Project Planning Tools Report 2010 (English Heritage)</i>, the <i>Farmstead Assessment Guidance (English Heritage)</i> and the <i>Herefordshire Historic Farmsteads Characterisation Project 2008 (Herefordshire Council)</i>. ...</p> <p>The West Midlands Farmsteads and Landscape Project notes that in Herefordshire, the commercial re-use of rural buildings has tended to revolve around tourism development. Whilst there may be some scope for further tourism development there is now greater potential for other types of businesses to develop. The wide range of building types are suitable for a variety of different businesses and expanding broadband availability will help to increase their potential, ultimately contributing to a diverse rural economy and increased local job opportunities. Where a redundant building in open countryside is a heritage asset and is proposed for residential use, applicants must demonstrate that other non-residential uses are not viable through a market tested report to be submitted with any application.</p>	To remove superfluous text.
E.154	4.8.45	<p>Amend: 'Policy RA5 does not is not intended to support the rebuilding of rural buildings which have fallen into a derelict ruinous state. <u>as At this point</u> their significance has usually been lost. <u>Candidate</u> Buildings should therefore be structurally sound and capable of bona fide conversion for the proposed use without major reconstruction. A full structural survey may be required to demonstrate whether this is the case.'</p>	To add clarity to the text
E.155	4.8.47	<p>Where required applicants will also be required to demonstrate that proposed uses respect the character of the buildings, are suitable for the rural environment, address sustainable transport issues and do not have a negative impact on the amenity of local residents and environment and in</p>	To add flexibility to recognise that these issues may be covered by other plans.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.156	4.8.49	<p>terms of noise, light and air pollution. Detailed design requirements for proposals for the re-use of individual buildings and farmsteads will be set out in a Design Guidance Supplementary Planning Document. However in broad terms proposals must ensure that schemes respect the historic character and interest of the buildings, its relationship with other buildings and heritage assets, and its place in the wider landscape. Overall, schemes should keep new openings to a minimum; respect internal features and spaces; and avoid introducing non-traditional 'over-domestic' features such as dormer windows, chimney stacks, porches or unsympathetic materials.</p>	
E.157	4.8.50	<p>in summary this policy supports the sustainable re-use of rural buildings where it secures their future, the changes proposed do not harm their character and there are no unacceptable impacts on the local environment and local communities.</p> <p>Although planning policy for economic development in Herefordshire centres on providing broader and takes into account the surrounding land and villages outside urban areas. The rural areas have consistently which have for many centuries played a strong role in local, regional and national food and drink production, particularly in areas such as agriculture and farming. Other uses within the rural economy consist of local businesses and services, village shops and public houses, tourism activities and accommodation, home working businesses, military uses, as well as farm diversification enterprises. The strengthening of the rural economy is also important for in retaining a skilled labour force within the rural area, and offers opportunities for employment, particularly to young people. In order to allow the rural economy to grow into the future, there is a need for the following policy to allow provides flexibility for start-ups and continuation of new business enterprises, business diversification, and home working and embracing. It also embraces new technologies and methods to allow the rural economy of Herefordshire to prosper. into the future</p>	To remove superfluous text.
			To remove superfluous text.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.158	4.8.53	A number of initiatives have demonstrated the importance of food and drink production in supporting and strengthening the rural economy. Research upon local food webs has been undertaken which showed that local food economies and independent retailing are under threat from supermarket expansion and centralised supply chains. The study which focused on a smaller local model used for Ledbury is a template which can be used for other local communities as well as the surrounding county as a whole.	To remove superfluous text.
E.159	4.8.54	In addition to Policy E4 which promotes tourism within the county, Tourism plays a large role within the rural economy. The varied with the provision of tourist centres, information points and displays, static caravans, chalets, camping and touring caravan sites. Such tourism facilities enable existing farms and rural businesses to diversify as well as accommodating the needs of visitors.	To remove superfluous text.
E.160	4.8.55	As well as tourism, the rural areas also play host to a number of wedding and corporate functions which take place within purpose built structures or buildings and larger country houses, some in isolated locations and others within rural settlements. It is important that scale is taken into account in these circumstances, as even a material change of use has the ability to affect the local amenity by way of issues such as noise, traffic and parking Within Herefordshire, there are also a number of isolated and previously developed (brownfield) sites within the countryside, detached from a settlement, and which have ceased operating. Some sites may no longer contain any buildings, and seeing as they are in isolated locations, it would not be effective or sustainable to promote further development.	To remove superfluous text.
E.161	4.8.56	Within Herefordshire, there are also a number of isolated and previously developed (brownfield) sites within the countryside, detached from a settlement, and which have ceased operating. Some sites may no longer contain any buildings, and seeing as they are in isolated locations, it would not be effective or sustainable to promote further development.	To remove superfluous text.
E.162	4.8.57	An isolated employment sites may be appropriate for <u>capable of remaining viable</u> with small extensions <u>and/or</u> redevelopment. <u>and A justification will need</u> <u>to be provided to demonstrate the necessity need</u> for these additions. Extensions and redevelopment of existing employment sites <u>will be looked upon favourably, however these Proposed</u> developments will need	To remove superfluous text.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.163	4.8.58	<p>to take into account other relevant policies within this Plan. on appropriate siting and design within the open countryside.</p> <p>The National Planning Policy Framework core principles encourages planning policies which outline the effective use of brownfield land, except where the site has high environmental value. Although a site may have had buildings on it in the past, this does not justify the appropriateness to redevelop the site if the buildings have since been removed. Sites without buildings will require an assessment of their environmental value and whether they make a positive contribution to the landscape, even if the site currently contains the remnants of an existing use. Dependent upon the nature and sustainability of the site, it may be more appropriate and effective to keep a site with no buildings in its current state</p>	To remove superfluous text.
E.164	4.8.59	<p>Amend paragraph to read: These policies will be delivered by:</p> <ul style="list-style-type: none"> • the Infrastructure Development Plan and developer contributions/community infrastructure levy • the development management process • <u>Hereford Area Plan, Bromyard Development Plan, Neighbourhood Development Plans,</u> other Development Plan Documents <u>as appropriate and Supplementary Planning Documents and Neighbourhood Plans.</u> 	To update the plan
E.165	4.8.60	<p>Amend paragraph to read: In addition to the indicators listed in the Spatial Strategy and General Policies' sections, the following indicators will be used to measure the effectiveness of the policies:</p> <ul style="list-style-type: none"> • utilising the AMR to develop an indicator of housing completions by HMAs and rural HMAs • utilising the AMR to monitor the number of housing completions relating to market housing for local people 	To update the plan

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.166	4-8.61	Delete paragraph Sustainability Appraisal and Habitats Regulations Assessment The Sustainability Appraisal Report produced as part of the development of this Pre-Submission Publication Version of the Core Strategy recommended three additional criteria to the place-shaping policies on Bromyard (BR2) and Leominster (LO2), relating to issues concerning the protection of heritage assets, particularly archaeology (Bromyard and Leominster policies) and contributing to zero carbon emissions. These have been incorporated into this document, where possible, although the issue of zero carbon development is being addressed at the national level through forthcoming changes to Building Regulations and will not be issue for planning policy.	To remove superfluous text.
5. General Policies			
E.167	Para 5.1.9	Insert new sentence at end of paragraph: <u>The relationship of postcode areas to Housing Value Areas can be found in Appendix 7</u>	To refer to new appendix
E.168	5.1.16	Amend paragraph to read: Rural exception schemes need to take full account of environmental considerations including design, siting and materials and avoid sensitive locations where development would not be permitted for reasons of landscape or visual impact. Similarly a site's location should not place additional financial burdens upon households occupying the scheme such as through isolation or increased costs in gaining access to local services and facilities, for example schools and employment. Given that these schemes may be located in or around small villages, the scale of development should reflect the locality; meaning that small affordable housing schemes should not normally exceed 15 dwellings in total.	To reflect that there may be larger scale proposals which may be acceptable
E.169	5.1.17	Amend paragraph to read: National planning policy indicates that consideration should be given to whether allowing some market housing on exception sites would facilitate the provision of significant additional affordable housing to meet local needs. Where such schemes are proposed, the applicant will need to demonstrate that a mixed tenure scheme is essential to the delivery of the affordable housing and that it removes the need for public subsidy. Open market housing should be limited to an absolute minimum in such schemes and only in order to make the scheme viable. The preparation of Neighbourhood Development Plans and/or other Development Plan Documents will also provide an opportunity to identify sites for affordable housing	To reflect that there are occasions where public subsidy may be required to make schemes viable.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.170	5.1.21	Amend paragraph to read: It is important that the accommodation needs and requirements of all sections of the community are considered in developing planning policies. Government planning policy is increasingly favouring the identification of sites for travellers. Herefordshire Council recognises these requirements which will be taken forward in the preparation of a new Travellers' Development Plan Sites Document. In the interim however, the following policy is required in order to consider the merits of planning proposals.	To bring the Core Strategy up to date
E.171	5.1.23	Amend paragraph to read: The approach to planning for travellers through the preparation of a Traveller Development Plan Document <u>Travellers' Sites Document</u> will reflect the increased involvement of <u>traveller and settled</u> communities in determining the location of development. Traveller sites include those considered necessary to meet the residential needs of gypsies and travellers who will remain in a location permanently or for substantial periods, transit sites for those moving through the area as well as plots for travelling show people.	To bring the text up to date and make the wording compliant with Planning Policy for Travellers, 2012
E.172	5.1.35	Amend paragraph to read: Population growth will generate a range of service needs throughout Herefordshire, particularly concentrated within the major growth locations, and it is essential that these service needs are supported by appropriate levels of social and community infrastructure. This should come forward either as an integral part of the development (adaptable, mixed use and made available at an early stage), or by way of a developer contribution/community infrastructure levy monies which <u>meet the relevant tests of paragraph 204 of the NPPE.</u>	To clarify the paragraph
E.173	5.1.44	Amend paragraph to read: Herefordshire is fortunate to have a broad range of open space, sports and recreation facilities which are both in public and private ownership. Open space, sports and recreation typology definitions are based upon PPG17 - Assessing Needs and Opportunities: A Companion Guide and include (but are not limited to) formal and informal parks and gardens, school sports grounds, public rights of way, allotments, semi-natural areas (including orchards), sports playing fields, cemeteries and churchyards, amenity areas, indoor sports halls, children's play facilities, village halls, civic spaces, country parks, green infrastructure corridors and canals.	To remove out of date references

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.174	5.1.46	Amend paragraph to read: Wherever possible, The need for space, sports and recreational facilities will be considered on a site by site basis. Open space sports and recreation facilities will need to be placed on site and be integral to the functioning of the development. Off-site contributions will be sought where appropriate, on an equally beneficial basis for the local community and will include provision for appropriate maintenance (as defined by the local planning authority) of the open space, sports or recreation facility	To clarify the application of the policy.
E.175	5.1.48	Amend paragraph to read: In order to identify shortfalls against a local standard of provision and set out future requirements, Herefordshire Council has undertaken a local assessment of existing provision of open space, sports and recreation needs which is in accordance with the National Planning Policy Framework, the companion guide to PPG17 and standards set by relevant organisations such as Fields in Trust, Sport England and Natural England. This assessment comprises an Open Space Study 2007, Sports Facilities Framework 2010, Play Facilities Study 2013 and a Playing Pitch Assessment 2012. The council is updating its evidence base in order to incorporate local standards into either a supplementary planning document, other Development Plan Document and/or Neighbourhood Development Plans. This evidence base will be used to secure appropriate planning contributions to aid development of open space, sports and recreation facilities throughout Herefordshire.	To remove out of date references
E.176	5.1.50	Delete Paragraph: Proposals for major sporting or leisure facilities away from Hereford city centre and the market towns will not be appropriate unless there is a demonstrable requirement for their use to be established in a particular location. Proposals for such facilities will also need to take into account other relevant policies in this plan, covering issues such as the impact upon the landscape and surrounding environment	Paragraph not required as the issue would be covered by other policies
E.177	5.1.57	Amend paragraph to read: Along side the above, development proposals should meet the requirements prescribed by <u>have regard to the council's LTP while promoting the principles set out in Herefordshire Council's Highway Development Design Guide for New Developments and the Department for Transport's Manual for Streets and Manual for Streets 2 – Wider Application of the Principles (2010)</u> Consideration will also be given to the Department of Transport Circular 02/2013 and Design Manual for roads and bridges or subsequent documentation.	To update the plan

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.178	5.2.2	Amend paragraph to read: The following policies relate to the theme of economic prosperity and include policies for the provision of employment land; safeguarding existing employment land; home working, tourism, town centres and primary shopping areas and frontages. They supplement the spatial strategy policy SS5 and the Place-Shaping policies. In particular, they address <u>relevant</u> Core Strategy objectives 6-9 set out in the spatial strategy section	To update the plan
E.179	5.2.22	Delete from paragraph: <i>"The Marches Hotel Study 2012 indicates that three star hotels dominate supply in Herefordshire. The study identified a need for larger 4-star hotels in the county with business and conferencing facilities. In order to ensure that there is not an oversupply of a particular standard of hotel"</i>	To remove superfluous text
E.180	E5	Policy E5 – Town Centres In second paragraph insert: Proposals for development outside the town centres will only be permitted if it can be demonstrated that the requirements of the sequential test, <u>as set out in paragraph 24 of the NPPF</u> , have been met and that the proposal would not have a significant adverse impact on the vitality and viability of the centres. An application will be refused if it fails the sequential test or an impact assessment.	To provide clarity regarding the sequential test.
E.181	5.3.3	Locally distinctive assets both natural and man-made, are finite and <u>irreplaceable</u> and any detrimental impacts can carry cultural, environmental, economic and social costs. A number of assets benefit from statutory designations within national and international legislation. Statutory designations range from large areas conserved for <u>landscape geodiversity</u> or <u>biodiversity</u> importance, such as the Wye Valley and Malvern Hills Areas of Outstanding Natural Beauty and River Wye Special Area of Conservation, to individual statutory listed buildings which are protected for their architectural or historical significance. <u>Appendix 8 lists designated sites in Herefordshire at time of adoption</u>	To clarify text and update the plan regarding new appendix.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.182	5.3.4	Amend paragraph to read: Non-statutory designations and locally determined features are equally important to Herefordshire's local distinctiveness. Working with partner organisations, Herefordshire Council has identified important assets such as local wildlife sites, <u>local geological sites</u> and areas and buildings of local interest which contribute to Herefordshire's unique character. Non-statutory locally distinctive buildings and green spaces will be identified through forthcoming Development Plan Documents or Neighbourhood Development Plans	To update the plan
E.183	5.3.8	Amend fourth sentence: For development proposals there are often opportunities for mitigation measures to conserve landscape features such as trees, to restore features such as boundary hedges and to enhance the landscape character by other means such as woodland planting, creation of wetland areas or restoration of historic features	To remove unnecessary text.
E.184	5.3.9	Amend paragraph to read: A number of various landscape and townscape character assessments have been prepared supported by a Historic Landscape Characterisation and a number of <u>completed</u> conservation areas appraisals. The <i>Landscape Character Assessment Supplementary Planning Guidance 2009</i> (SPD) will be reviewed during the plan period. The SPD will build upon the detailed evidence base documentation; including Natural England's Character Areas as well as more recently produced <i>Urban Fringe Sensitivity Analysis January 2010</i> , <i>Rapid Townscape Assessments (various)</i> , <i>Green Infrastructure Strategy February 2010</i> and other local studies covering the architectural and historic environment. In conjunction with the above, relevant Areas of Outstanding Natural Beauty Management Plans, and <u>associated guidance</u> also provide more place-specific guidance which should inform development proposals from the outset	To add clarity
E.185	5.3.11	Amend paragraph to read: Biodiversity can be defined as the variety of sites, habitats and species within a specified locality and is influenced by factors such as geology, topography and climate. Geodiversity refers to the natural processes and constituent parts that have shaped the landscape and includes minerals, soils and water. <u>Geodiversity is the variety of rock, minerals, fossils, soils, landforms and natural processes that have shaped the landscape</u>	To add clarity

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.186	5.3.16	Revise end of first sentence: '.....local authority's administrative boundaries, are held at the listed in Appendices 8e-k and further information is held at the Herefordshire Biological Records Centre.'	To give clarity
E.187	5.3.17	Table following para 5.3.17 insert as title: Figure 5.2: Hierarchy of Green Infrastructure Assets	To give clarity
E.188	5.3.21	And change heading in column 1 to: <u>County / Regional Strategy</u> Amend paragraph to read: Development proposals should identify and protect existing green infrastructure. This could be based on areas mapped in the Green Infrastructure Strategy 2010 or any other features that contribute to the green infrastructure network. The Green Infrastructure Strategy 2010 and associated Study identify those features that contribute to the green infrastructure network This <u>Proposals</u> should take account of features within the site, but <u>and</u> also on adjacent sites as integration and connection with the surroundings is a key objective. Proposals should incorporate the retention and enhancement of features such as trees and hedgerows, together with long term management	To improve clarity and certainty
E.189	5.3.24	Amend final sentence; The <u>sustainable</u> re-use of existing buildings can also help mitigate climate change through reducing development pressures on greenfield sites, reducing demand for construction energy and materials and by minimising construction waste.	To give clarity
E.190	5.3.46	Amend first sentence: 'Policy SD3 <u>also</u> provides criteria for developers to consider when proposing development within areas identified as being at risk of flooding within the district.'	To give clarity

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.191	5.3.62	<p>The Environment Agency and Natural England have committed, through a formal Statement of Intent, to the preparations of prepared a Nutrient Management Plan aimed to control and reduce phosphate within the River Wye SAC and in doing so seek to identify actions to enable additional development. The Core Strategy will play a vital role in delivering the requirements of the Nutrient Management Plan, along with other mechanisms and measures. The Nutrient Management Plan will identify and associated Action Plan identifies the management actions required to achieve the conservation objectives target for phosphate by 2027. Planning guidance will be prepared where necessary to cover relevant measures included within the Nutrient Management Plan, or any revisions to it, comprising the need for planning advice, detailed phasing requirements, options that might be funded through developer contributions, water quality and ecological condition of stretches along the SAC rivers, and monitoring arrangements.</p>	To update the references to the Nutrient Management Plan
E.192	5.3.115	<p>Delete paragraph: Sustainability Appraisal 1.3.115 The Sustainability Appraisal Report produced as part of the development of this Core Strategy did not recommend any changes to any of the policies in this section. In relation to social progress policies, these were appraised as having mostly positive effects with a number having significant positive effects. The only negative effect identified in these policies was in relation to Policy H2 - allowing affordable housing schemes in rural areas which may have a negative effect on reducing the need to travel. The economic prosperity policies are assessed to have mostly positive effects, whilst in respect of the environmental quality policies the local distinctiveness and sustainable design policies are assessed to have mostly positive or significantly positive effects. Policies dealing with minerals and waste are assessed as having mixed effects. Policies dealing with minerals and waste are assessed as having mixed effects.</p>	To update the Core Strategy and remove unnecessary text.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
6. Delivery, Implementation and Monitoring			
E.193	6.13	The type of infrastructure that the tariff will be used to service is set out in an Infrastructure Delivery Plan (IDP). The IDP provides robust evidence of infrastructure requirements through to 2031, but the focus is on the measures that are needed within the first 5 years (2011 to 2016) from the date of adoption, in the context of the longer term plan set out in the Core Strategy. The IDP schedule and required infrastructure is set out on an area basis to include Strategic County-wide, The Hereford Area, the Market Towns and the Rural Areas	To give clarity
E.194	6.15	A list of prioritised infrastructure projects, which the council have committed to, will be advertised on the council's website in the form of a Regulation 123 list. This list will have been verified in terms of achievability and phasing of delivery through the Economic Viability Study 2014 a separate evidence base dealing with Economic Viability, which will ensure that a balance is struck between the required infrastructure projects and the ability of the strategic sites to be delivered by the development industry	To give clarity
E.195	6.22	The continuous monitoring of policies and proposals is essential to ensure that the Core Strategy achieves its objectives. The policies will be monitored principally through the Annual Monitoring Report (AMR), in the manner described at the end of each section of this document and in <u>Appendix 3 – the Implementation, Monitoring and Delivery Plan</u> . The AMR report will set out the basic achievements of the main policies and contain details about the implementation of the housing policies in particular.	To give clarity
Glossary of terms			

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.196	Glossary	<p>The following terms have been added/amended with definitions as appropriate:</p> <p>Aggregates Aggregates Working party <u>Custom build</u> <u>Functional need test</u> Local Aggregates Assessment Local Authority Collected Municipal Waste <u>Local Needs</u> Managed Aggregate Supply Systems Minerals Safeguarding Area Park and ride <u>Choose</u> Primary Aggregates Restoration Secondary Aggregate <u>Self-build Housing</u> Self-build homes and co-housing schemes <u>Social well-being</u></p>	To clarify the text of the Core Strategy or delete definitions where no longer necessary
E.197	Glossary	<p>Delete: Code For Sustainable Homes The Code is the national standard for the sustainable design and construction of new homes. It aims to reduce carbon emissions and create more sustainable homes.</p>	To reflect the fact that the Code has been withdrawn by government

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
Minor Modifications arising from comments made during the Main Modification consultations (Reference to the relevant Main Modification reference also included where necessary).			
E.198	MM03 1.17	Amend 2 nd sentence: Communities may wish to build new homes or new community amenities, and providing they can demonstrate overwhelming -local support <u>through a positive referendum result</u> , the Community Right to Build will give communities the powers to deliver this directly.	To clarify text.
E.199	MM07 SS3	Amend paragraph: Appendix 5 sets out the relationships between the delivery of housing and the timing of the main infrastructure requirements. It also identifies actions necessary to safeguard the integrity of the River Wye Special Area of Conservation (SAC) from significant adverse effects. The Council will actively monitor the relationships identified in this appendix. Any material delays in the implementation of identified infrastructure of environmental safeguards and which will lead to under-delivery of housing supply will inform the implementation of the range of measures set out above to ensure plan-led corrective measures are put in place.	To clarify text and correct typographical error.
E.200	MM07 New para (Before 3.43)	Amend 2 nd sentence: Appendix 54 sets out an indicative trajectory for total housing completions, which will provide a basis for monitoring completions over the plan period.	To correct referencing error.
E.201	MM08 SS4	Amend 5 th bullet point: <ul style="list-style-type: none"> • Ride<u>Choose</u> schemes; and 	To ensure consistency with other references within the plan.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.202	3.59	<p>Amend 3rd sentence: The existing railhead for minerals transport at Moreton-on-Lugg will continue to be protected through the minerals section of the Core Strategy.</p>	To reflect and be consistent with MM01- removal of the minerals section of the Core Strategy.
E.203	<p>MM011 SS6</p>	<p>Amend 1st sentence: Development proposals should conserve and enhance those environmental assets that contribute towards the county's distinctiveness, in particular its settlement pattern, landscape, biodiversity and historical heritage assets and especially those with specific environmental designations.</p>	To ensure consistent references within the plan.
E.204	<p>MM011 3.102</p>	<p>Amend 2nd sentence: In addition Natural England has prepared conservation objectives for each Special Area of Conservation within the county; it is also consulted upon proposals that might affect <u>Special Areas of Conservation and Sites of Special Scientific Interest</u>, and will be aware of management principles that may be relevant to the maintenance and achievement of their favourable conservation status.</p> <p>Amend 4th sentence: The most rigorous approaches to assessing the effect of development should be taken for those areas with national or international and <u>national designations</u>, including proposals in areas outside but having an effect upon them, in accordance with the protection afforded to such areas in the National Planning Policy Framework.</p>	To add clarity to the text.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.205	<p>MM015 HD2</p>	<p>Amend 5th bullet point:</p> <ul style="list-style-type: none"> • Herefordshire Council will work with the tenant(s) of Edgar Street football stadium to explore opportunities for the a sports led mixed-use redevelopment of parts of Hereford United Football Ground, incorporating new spectator stands, will be sought; and <p>Amend final bullet point:</p> <ul style="list-style-type: none"> • enable the protection, conservation and enhancement of Hereford's heritage assets, where their significance and setting, including archaeology, with particular regard to the historic street patterns and the skyline. 	<p>To clarify text, and to correct a spelling error.</p>
E.206	HD4	<p>Remove strikethrough in 3rd bullet point: ...improving connectivity for sustainable mode users;</p>	<p>To correct a typographical error.</p>

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.207	<p>MM018 HD5</p>	<p>Amend first paragraph: <u>Land at Three Elms will deliver a comprehensively planned sustainable urban expansion. The new development will be sensitively integrated into both the existing urban fabric of Hereford, and the wider landscape, through high design and sustainability standards. The area will be planned in a comprehensive manner to show the layout of development and the required infrastructure. Appendix 5 sets out the relationship between the development of urban expansion areas and the provision of key new infrastructure. Land north west of the city centre is identified for a sustainable mixed use urban expansion to be comprehensively masterplanned to form a series of inter-related new neighbourhoods. The development will be expected to provide:</u></p> <p>Update 5th bullet point:</p> <ul style="list-style-type: none"> land and infrastructure for a transport interchange of around 150 spaces Park and Choose facilities; site (land and infrastructure);: <p>Amend 11th bullet point:</p> <ul style="list-style-type: none"> integration of Huntington Village into the development area in a way which respects, preserves protects, conserves and, where possible, enhances the setting of the Conservation Area and heritage assets; 	<p>To ensure consistency with other policies within the plan, to avoid repetition within the policy.</p>
E.208	<p>MM026 LB2</p>	<p>Delete 7th bullet point:</p> <ul style="list-style-type: none"> primary vehicular access to the development will be from either the Hereford Road under the viaduct with the option of a secondary access or from the Bromyard Road to the north; <p>and replace with:</p> <ul style="list-style-type: none"> provision of satisfactory vehicular access arrangements, the details of which will be determined at planning application stage; 	<p>To clarify the policy.</p>

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.209	MM026 4.5.7	Add to end of paragraph: <u>and will be considered as part of the Council's determination of planning applications submitted on the site.</u>	To clarify the approach to development on the site.
E.210	MM036 4.8.11	Amend paragraph: The <u>minimum</u> indicative rural HMA target <u>will underpin</u> assist in informing the scale of development in the <u>settlements</u> villages identified in each HMA. The target represents a level of growth for parishes, as a percentage and which, that is considered proportionate to existing HMA characteristics, and reflective of future housing needs and requirements within that area. For individual villages of each HMA this is translated as a percentage of the total number of dwellings in the village core (not parish). For example, the growth target for a village of 100 dwellings located within the Bromyard HMA (which has 15% target) would be approximately 15 new dwellings over the plan period 2011 to 2031.	To add clarity and ensure consistency within the plan.
E.211	MM037 4.8.18	Amend 2nd sentence: This approach will enable all settlements in the rural areas to accommodate appropriate and environmentally sensitive sustainable housing development in accordance with the National Planning Policy Framework.	To clarify the objectives of the approach taken.
E.212	MM037 4.8.25	Amend 1st sentence: On this basis, housing proposals will be expected to reflect the range that is required in for the settlement concerned.	To make better use of grammar.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.213	<p>MM037 4.8.26</p>	<p>Amend 2nd sentence Replace “are” with “were”</p> <p>Amend 3rd sentence: These plans will be the principal mechanism by which new housing will be identified, allocated and managed.</p> <p>Amend 5th sentence: The target represents a level of growth for settlements <u>parishes</u>, as a percentage, that is proportionate to existing HMA characteristics.</p> <p>Delete 6th sentence: For individual settlements in each HMA, this will be reflected as a percentage of the total number of dwellings in the parish concerned.</p> <p>and replace with: <u>The main focus for development will be within or adjacent to existing settlements indicated within fig 4.20 and 4.21.</u></p>	<p>To clarify the approach taken to Neighbourhood Planning and to ensure consistency within the plan.</p>
E.214	<p>MM037 RA2</p>	<p>Amend 1st sentence: To maintain and strengthen locally sustainable communities across the rural parts of Herefordshire, sustainable housing growth will be supported in <u>or adjacent to</u> those settlements in Figures 4.20 and 4.21.</p> <p>Amend 4th sentence: Neighbourhood Development Plans will allocate land for new housing or otherwise demonstrate delivery to provide levels of housing to meet the various targets, <u>by indicating levels of suitable and available capacity.</u></p>	<p>To add clarity to the policy approach.</p>

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.215	<p>MIM038 4.8.28</p>	<p>Amend 1st sentence: Where appropriate, the settlement boundaries (or a reasonable alternative) for those places/settlements listed in Policy RA2 will be defined in either neighbourhood development plans or the Rural Areas Sites Allocation DPD.</p> <p>Place 3rd sentence: In the period leading up to the definition of appropriate settlement boundaries the Council will assess any applications for residential developments in Figure 4.20 and 4.21 against their relationship to the main built up form of the settlement.</p> <p>Before the current 2nd sentence: Outside of these settlements new housing will be restricted to avoid unsustainable patterns of development.</p>	<p>To add clarity to the requirement for settlement boundaries where they are appropriate to the character of the settlement, and to add clarity to the policy approach in general.</p>
E.216	<p>MIM040 RA5</p>	<p>Add to first sentence: The sustainable re-use of individual and groups of redundant or disused buildings, including farmsteads in rural areas, which will make a positive contribution to rural businesses and enterprise and support the local economy (including live work units) or which otherwise contributes to <u>residential development</u>, or is essential to the social well-being of the countryside, will be permitted where:</p>	<p>To clarify the policy's intent.</p>
E.217	<p>MIM041 RA6</p>	<p>Add to 5th bullet point:</p> <ul style="list-style-type: none"> • promote the sustainable use of the natural and historic environment as an asset which is valued, and conserved and enhanced; 	<p>To ensure consistency with national policy and with other policies within the plan.</p>

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.218	MM045 5.1.26	For figures in opening sentences: As at January 2015*, there are 114 authorised residential pitches within Herefordshire with a further 21 pitches on unauthorised, but tolerated sites. Numbers of caravans on these sites have fluctuated over the past two years from 148 to 161 and averaging 157. Insert footnote after 5.1.30: <u>*Caravan count conducted by Herefordshire Council (January 2015)</u>	To clarify the sources of information used.
E.219	MM055 5.3.14	Amend wording in 1st sentence: Dependent upon the scale and proximity of development proposals to <u>affecting</u> biodiversity or geodiversity features, Herefordshire Council may require developers to produce a management strategy to ensure the continued protection of the features of interest.	To add clarity to the text.
E.220	MM057 LD4	Amend criterion 1, delete the term " preserve... " and amend to " <u>protect, conserve and where possible...</u> "	To ensure appropriate terminology
E.221	5.3.114	Amend: ...the following indicators will be used to measure the effectiveness of the general policies Amend bullet point: <ul style="list-style-type: none"> ▪ number of listed buildings and scheduled ancient monuments on buildings at risk register (English Heritage <u>Historic England</u>); 	To correct a typographical error and to ensure the plan is up-to-date.

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.222	<p>MM065 Appendices</p>	<p>Update appendix: Appendix 1- Saved Unitary Development Plan (2007) policies and proposals maps (including policies to be replaced by the Local Plan- Core Strategy)</p> <p>Add new appendices: <u>Appendix 7- Housing Value Areas by Postcode</u></p> <p><u>Appendix 8- Sites with Environmental Designations</u></p> <ul style="list-style-type: none"> <u>A- Conservation Areas</u> <u>B- Scheduled Ancient Monuments (SAMs)</u> <u>C- Registered Historic Parks and Gardens</u> <u>D- Unregistered Parks and Gardens</u> <u>E- Special Areas of Conservation (SACs)</u> <u>F- Sites of Special Scientific Interest (SSSIs)</u> <u>G- National Nature Reserves (NNRs)</u> <u>H- Local Nature Reserves (LNRs)</u> <u>I- Special Wildlife Sites (SWS)</u> <u>J- Local Geological Sites</u> <u>K- Areas of Ancient and Semi-Natural Woodland</u> 	<p>To add clarity and provide more comprehensive information.</p>

Ref No	Policy/ Para/ Figure	Proposed Minor Modification	Reason for Minor Modification
E.223	MM065 Appendix 5	Serial 6, column: "Delivery Organisation", delete reference: HC BCWW	To ensure the appendix is factually correct.

Equality Impact and Needs Assessment Form

A) Description

Name of service, function, policy (or other) being assessed

Planning Policy – Herefordshire Local Plan - Core Strategy

Directorate or organisation responsible (and service, if it is a policy)

Economies, Communities and Corporate

Date of assessment

October 2015

Names and/or job titles of people carrying out the assessment

Kevin Singleton Team Leader: Strategic Planning

Accountable person

Andrew Ashcroft

What are the aims or main purpose of the service, function or policy? What does it provide and how does it provide it?

To provide the statutory Local Plan, a planning strategy and planning policies, for the County up to 2031. Aims and objectives of the Core Strategy can be found in section 4 of the Place Shaping document that can be found on the Planning Policy pages of Herefordshire Council website.

Location or any other relevant information

To cover the whole county

List any key policies or procedures to be reviewed as part of this assessment.

The whole Core Strategy

Who is intended to benefit from the service, function or policy?

All residents of and visitors to the county of Herefordshire, by setting out a clear planning strategy and planning policies for the county.

Who are the stakeholders? What is their interest?

National, regional and local organisations with an interest in planning and residents of the county.

B) Partnerships and Procurement

If you contract out services or work in partnership with other organisations, Herefordshire Council remains responsible for ensuring that the quality of provision/delivery meets the requirements of the Equality Act 2010, ie.

- Eliminates unlawful discrimination, harassment and victimisation

- Advance equality of opportunity between different groups
- Fosters good relations between different groups

What information do you give to the partner/contractor in order to ensure that they meet the requirements of the Act? What information do you monitor from the partner/contractor in order to ensure that they meet the requirements of the Act?

Access to all evidence base data.

Are there any concerns at this stage that indicate the possibility of inequalities/negative impacts? For example: complaints, comments, research, and outcomes of a scrutiny review. Please describe:

No

C) Information

What information (monitoring or consultation data) have you got and what is it telling you?

The Core Strategy Consultation Statements are published on the Planning Policy section of Herefordshire Council website. They contain all information regarding the publicity of the consultation, the timings of the consultation, who was consulted and all of the findings of the consultation. The information from these statements shows that consultation has aimed to fully allow all sections of the community to participate in the process.

D) Assessment/Analysis

Describe your key findings (eg. negative, positive or neutral impacts - actual or potential). Also your assessment of risk.

Strand/community	Impact
The Core Strategy can affect anyone in any walk of life, including people on low income, Gypsies and Travellers etc	The impacts have been planned to be neutral or positive

E) Consultation

Did you carry out any consultation?YES NO **Who was consulted?**

It was open to all residents of Herefordshire and key stakeholders, to identify their requirements and inform of their choices for the growth and development of Herefordshire up till 2031. Details of how and where we consulted and what the findings were can be found in the Core Strategy Consultation Statements available on the planning policy section of Herefordshire Council website. - www.herefordshire.gov.uk/planning-and-building-control/planning-policy/corestrategy.

Describe other research, studies or information used to assist with the assessment and your key findings.

Prior to the consultation commencing a new website was established which contained access to all the evidence base supporting the Core Strategy <https://www.herefordshire.gov.uk/planning-and-building-control/planning-policy/local-plan-evidence-base>

Do you use diversity monitoring categories? Yes **No**

(if No you should use this as an action as we are required by law to monitor diversity categories)

If yes, which categories?

- Race
- Sex
- Sexual Orientation
- Religion & Belief
- Disability
- Age
- Gender Reassignment
- Marriage & Civil Partnership
- Pregnancy & Maternity

What do you do with the diversity monitoring data you gather? Is this information published? And if so, where?

The results of the diversity monitoring through each stage of the development of the Core Strategy can be seen in the Core strategy's Consultation Statements which can be found on the Planning Policy website. Information gathered throughout the consultation is published within the Consultation Statement that can be viewed at https://beta.herefordshire.gov.uk/media/6846846/cs_consultation_responses.xls

F) Conclusions

	Action/objective/target OR Justification	Resources required	Timescale	I/R/S/J
a)	The Core Strategy has been recommended to Council and its implications are planned to be added to the Service Plans for the Council			R,S

b)				
c)				
d)				

(I) Taking immediate effect.

(R) Recommended to Council/Directors through a Committee or other Report*.

(S) Added to the Service Plan.

(J) To be brought to the attention of the Herefordshire Equality & Human Rights Group.



Meeting:	Cabinet
Meeting date:	15 October 2015
Title of report:	Local Account 2014/15
Report by:	Director of Adults and Wellbeing

Classification

Open

Key Decision

This is not a key decision.

Wards Affected

Countywide

Purpose

To approve publication of the Local Account of Adult Social Care and Support 2014/15

Recommendation(s)

That Cabinet approve the publication of the Local Account as attached at Appendix A

Alternative options

- 1 It is a Department of Health requirement that a Local Account be published. It would be possible to change the content and presentation but the draft complies with best practice guidance.

Reasons for recommendations

- 2 The reasons to approve the Local Account as attached are that:
 - a) it meets the Department of Health's requirements;
 - b) the content and layout reflect best practice recommendations from the regional Association of Directors of Adult Social Service (ADASS); and
 - c) It has been developed with full cooperation and production from service user and carer representation from the Making it Real Board.

Key considerations

- 3 All councils with a remit for adult social care are required by government to produce an annual local account of services. This relates to the replacement of the role of the regulator, the Care Quality Commission (CQC), in assessing council performance by

Further information on the subject of this report is available from
Paul Harris on Tel (07792 881 832)

a lighter-touch approach, which emphasises local accountability and sector- and peer-led assessment.

- 4 The purpose of local accounts is twofold: to communicate with and promote accountability to the local community; and to support benchmarking, peer review and sector-led improvement.
- 5 National guidance leaves the format and content to be determined locally. The approach agreed for Herefordshire is to address the challenges and requirements by:
 - a) Producing the document as a web based PDF, available online but easy to print off hard copies;
 - b) Having a tone and style aimed at citizen audience;
 - c) Having the comprehensive underpinning data published separately and referenced, interwoven and analysed throughout the account (e.g. statutory returns, user and carer surveys, complaints reports, CQC reports on providers, national census data);
 - d) Being balanced and therefore credible – good news **and** bad news, both in context and evidence based;
 - e) Giving the context of national policy, financial challenges and the range of organisations that deliver social care;
 - f) Having a structure based on the national performance; and
 - g) Consulting and involving a range of stakeholders during the production.
- 6 This year's local account details progress against the objectives set out in the previous year's report and other areas of service improvement. It reports on the findings of the peer review which was undertaken in June 2014 and the progress made towards meeting its key recommendations. It provides both financial and performance data for 2014/15 reporting year and also sets out some of the key challenges and priorities for 2015/16. There are also several case studies which give a person centred perspective on some of the changes that have been made within the reporting year.

Community impact

- 7 The final document, and the process of producing it, is an important element in ensuring local authorities make themselves accountable to their local communities.

The local account specifically gives a true and fair outline of key issues and performance to a general reader and reflects and refers to the detailed evidence available on the council's "Facts and Figures" webpages and in the wider public domain.

Equality duty

- 8 The local account identifies how we support our vulnerable people with a range of tailored services.

Financial implications

- 9 There are no financial implications.

Legal implications

- 10 All councils with a remit for adult social care are required by government to produce an annual local account of services. Local accounts are referred to in the Department

Further information on the subject of this report is available from
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of Health's "Transparency in Outcomes: a framework for adult social care" consultation paper (November 2010) in the context of localism and transparency, and in the subsequent Adult Social Care Outcomes Framework published in March 2011.

This guidance leaves format and content to be determined locally.

The attached local account fulfils this requirement.

Risk management

- 11 The proposal does not contain any specific or direct risk management implications.

Consultees

- 12 The production of the 2014/15 Local Account has been fully co-produced with service users and carers on the Making it Real Board. The Board has had full oversight and has directed much of the content this year.
- 13 The subjective content of the account is based on the annual survey of social care users and also the opinions of residential and nursing care service users, through the quality and review team survey.
- 14 The local account has been presented to the Health & Social Care Overview and Scrutiny Committee. The document was accepted with no changes required and generated general discussion about the work and performance of Adults & Wellbeing.

Appendices

Appendix A – Local Account 2014/15

Background papers

None

Adult Social Care in Herefordshire

Our Local Account 2014/15



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Introduction

We began a conversation last year about the need to change our approach to adult social care. As the financial challenges continue to grow we need to move this conversation forward and discuss collectively how we are going to manage with less money at a time when more people need help.

We have continued to make significant changes over the last year in line with requirements from the Care Act 2014 which you can read about in this Local Account. Our focus has been, and will continue to be, helping people look after themselves better and supporting communities so that we can help people remain independent for longer.

Our aims remain clear: we want to make sure Herefordshire residents:

- have access to information, advice and guidance to help them keep safe, healthy and independent;
- have choice and control with services that are affordable;
- are offered care and support that is integrated across health and social care;
- have access to supportive local communities;
- are able to access good quality services that meet their support needs.

This year's Local Account highlights some of the challenges we have faced and achievements we have made in 2014-15, many of them as a result of the Care Act. The journey continues in 2015-16.



Councillor Patricia Morgan
Cabinet member for health
and wellbeing

Herefordshire – the context

Understanding the challenge

Herefordshire has a population of 186,100 people; 59,900 of these live in Hereford, 9,800 in Ledbury, 11,900 in Leominster and 10,700 in Ross-on-Wye. The rest of the population live in the rural parishes – Herefordshire has the fourth lowest population density in England.

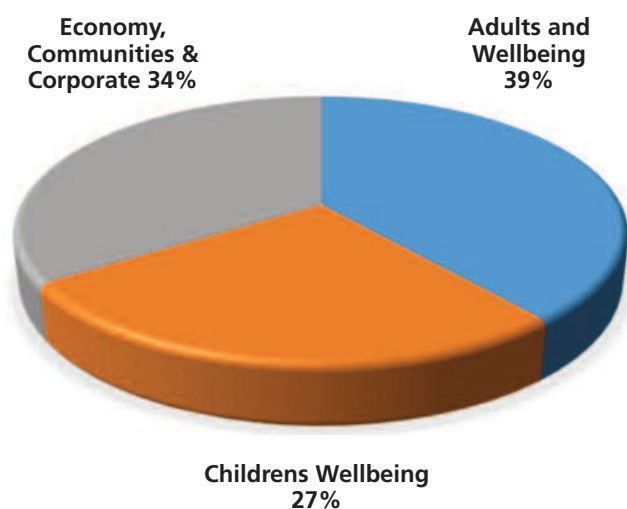
The county has an older age structure than England and Wales averages, with people aged 65 and over constituting 23 per cent of the county's population (42,000 people), in comparison with 19 per cent nationally. It also has a higher proportion of older people compared to similar authorities.

Projections suggest 30 per cent of Herefordshire's population will be aged 65+ in 2031, compared to 23 per cent nationally. This equates to around 50,400 65-84 year-olds (39 per cent more than in 2013), and approximately 11,700 aged 85+.

Council Expenditure

In 2014/15 the councils net expenditure was a little over £145m. Of this, 39% was spent on adult social care services.

Council spending in 2014/15



Nursing care
£10.4m

474 people received nursing care during the year

670 people received residential care during the year

Residential care
£22m

Direct Payments
£0.8m

Personal Budgets
£4.5m

451 people received direct payments during the year

Domiciliary Care
£11.6m

Supported Accommodation
£2.3m

Other Services
£3.2m

Carers
£1m

1804 people received other community based services during the year, including domiciliary care and day care services

How is care provided in Herefordshire

The adult and wellbeing directorate is part of Herefordshire Council. We work with other organisations across the county to support adults who have care and support needs to be as independent as possible and stay safe. These organisations include:

Voluntary and community organisations; organisations such as Herefordshire Carers, Services for Independent Living and Hereford Disability United provide information advice and support services.

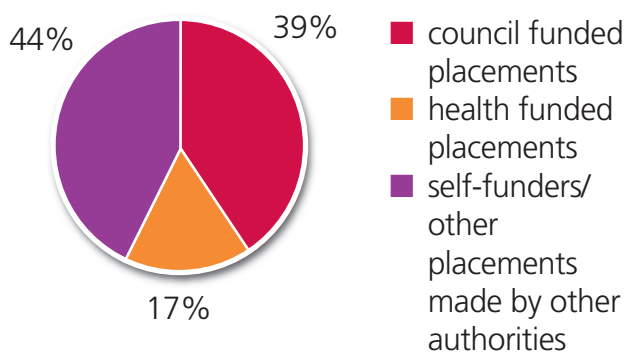
Health service; including hospitals and GPs, who provide the medical treatment for Herefordshire residents.

Domiciliary care (home care) agencies and other service providers; help to support individuals to remain living in their own homes, often meeting personal care needs.

Friends and family; a huge number of people provide informal care to their friends and family, this was estimated to be around 21,000 carers in the 2011 census.

Care homes; provide people with a safe place to live where their care, support and health needs can all be met.

This graph gives an indication of the types of placements made within care homes in Herefordshire. Whilst the council places a large proportion of people in care homes, there is significant demand from self-funders in the county.



Social care in a changing world

The social care system faces unprecedented challenges:

- demographic change;
- dealing with the implications of the economic downturn;
- significant funding challenges (funding for local authorities has reduced by 40% in the last five years);
- new public health responsibilities;
- integration with health by 2017.

We recognise the magnitude of the challenge confronting all of us and realise we won't be able to continue to provide care in the same way that we have historically; we are committed to seeking new, inclusive ways to face these challenges.

Our new approach is founded upon the following priorities:

- to help people take care of themselves better – by asking individuals what they need then helping them make that happen;
- to support communities and help them grow so that they can support people better;
- to change people's expectations so that they can be realistic about what is available, who will provide it and how it will be paid for.

In 2014-15 we began talking to people about this new approach. At the same time, we began to plan for a new information, advice and signposting service to pull together all the rich community-based assets in a new online directory for Herefordshire people.

Challenges identified in our last Local Account

Progress in 2014-15

We aimed to:

What we achieved:



Make it easier for people to have choice and control with a direct payment

Refreshed our direct payments policy
Updated our direct payment fact sheets
Produced easy to read literature



Work closer with health

Signed up to the Better Care Fund and began planning collaboratively to help people avoid going into long term care and/or hospital



Meet all the Care Act requirements

Reviewed and changed our assessment process
Developed an information and advice service to be launched in 2015-16
Refreshed policies



Improve our safeguarding services

Implemented a person-centred approach through Making Safeguarding Personal
Reviewed and launched a new Herefordshire Safeguarding Adults Board



Improve our approach to personalisation and involve people more in service changes or redesign

Improved dialogue between commissioners and people affected by service changes
Making it Real Board developed further
Personalisation lead appointed

Key highlights of the journey so far

April 2008

Herefordshire Council and Herefordshire Primary Care Trust establish a single management structure to become Herefordshire Public Services.

April 2011

Health and social care join forces to form Wye Valley NHS Trust – the first integrated provider of acute, community and social care in England.

2012

National reforms lead to primary care trusts being replaced by clinical commissioning groups.

Sept 2013

The council brings social care back into the council. It also changes the way some of the social care services is provided so that service users can use direct payments to buy these services.

Health services for people with learning disabilities is transferred from Wye Valley NHS Trust to 2gether Foundation Trust.

The council develops a new structure and Adults becomes a single directorate.

Council embarks on a programme of commissioning to bring new providers and a fresh approach to services in the county.

March 2014

The council extends arrangements for 2gether NHS Trust to provide mental health and substance misuse services pending a strategic review in 2014.

Summer 2014

Public health becomes part of the adult and wellbeing directorate in order to align prevention work.

March 2015

The council brings seconded staff from 2gether NHS Trust back into the council to deliver assessment and care management services for mental health clients.

Some of our achievements 2014/15

Care Act 2014

The Care Act brought together existing legislation into a new set of laws to build a health and social care system around people's wellbeing, care needs and improved outcomes. It had a big impact on adult social care in 2014-15 as local authorities prepared to meet the following Care Act requirements:

- easier access to information and advice, and more of it;
- more activities and support for people to choose from and changes to the way care is paid for;
- review of support for carers;
- new national eligibility criteria;
- local safeguarding boards to become statutory;
- making it easier for young adults to move from children's services to adult services.

To prepare for the Care Act implementation on 1st April 2015, we refreshed several key policies (see page 9), revised systems and processes, strengthened our safeguarding board arrangements, developed a new approach to assessments in line with new eligibility standards. We also tendered for a advocacy services and a new community hub and system provider for information and advice. We have trained all our staff to make sure they deliver assessments and services in line with the new regulations.





Making Safeguarding Personal

In January 2015, we implemented the national programme, Making Safeguarding Personal (MSP) in Herefordshire. MSP focuses on person-centred support, helping people at risk of harm to achieve what they want to achieve by:

- talking and listening to people about what they want to happen
- recognising the person as the expert on their own life
- giving people greater choice and control
- working with the individual to achieve the outcomes that they themselves determine
- improving the quality of life, wellbeing and safety of the adult

Safeguarding Board

We have renewed and strengthened the Herefordshire Safeguarding Adults Board by:

- appointing an independent chair of the safeguarding board
- rearranging the remit of the board and its subgroups
- recruiting new members to the board in addition to the statutory members
- developing support to the board through a newly established business unit
- working with West Midlands councils to produce new policies and procedures

Policy Refresh

We have updated and reviewed the following policies:

Care and Supporting Your Needs Policy

(https://www.herefordshire.gov.uk/media/7963891/care_and_support_and_meeting_your_needs_2015.pdf)

Charging Policy

Direct Payments Policy

(<https://www.herefordshire.gov.uk/health-and-social-care/adult-services/direct-payments-for-social-care>)

Deferred Payments Policy

(https://www.herefordshire.gov.uk/media/2106081/Deferred-Payment-Agreement-Policy_Final.pdf)

Safeguarding Policy

(https://www.herefordshire.gov.uk/media/2450704/wm_adult_safeguarding_pp_draft1415.pdf)

We have also worked on internal policies around supervision and care with recording, and quality assurance, in order to support our social care workforce.

Independent Living Fund (ILF)

The Independent Living Fund came to an end in June 2015. In the build up to this date, all clients in receipt of ILF payments were reviewed by our social care team. Letters were sent out to all recipients explaining the changes that would be taking place and some additional staff were brought in to focus on the task.

Recognising some service users were anxious about the ILF finishing, all were re-assessed and packages of care continue to meet the needs of most individuals.

Barbara's story

- the impact of the Independent Living Fund closing

CASE STUDY

Barbara never really enjoyed games at school: walking had always been difficult for her, but no one seemed to know what the problem was. All came to a head in 1992 when she had a relapse and lost her sense of balance. This resulted in her being unable to drive anymore and she lost her confidence to out anymore because of the dizziness and pain she suffered.

Barbara is one of people in Herefordshire who received financial support from the Independent Living Fund (ILF). She also received some help from the council which she received in the form of a direct payment. She was very worried when she heard the ILF was to close because at the time, the bulk of the funding she was receiving was from the ILF.

Barbara felt her concerns were compounded by the fact that very little information was available from the ILF, and the council too was unsure about how the fund was going to be closed down.



"I had a reassessment in March, then another one in May so that my funding arrangements could be transferred to the local authority," said Barbara. "Luckily, my support plan has been reasonably well protected, so I don't lose out financially. But the last year has been a very worrying time for me and my family: there were lots of rumours about cutting services and reducing your hours. Then there was the worry about the money coming into the local authority and not being ring-fenced so it could be used to pay for roads to be mended instead."

"I am still worried about what will happen next year as the council has not said anything. It is the lack of information that is worrying."

Barbara is an active member of the Making it Real Board and will continue to challenge and ask questions to make sure that people are kept informed of changes that affect them in an accessible way. Her role gives people who use services like her a voice and makes sure the council continues to address real issues that matter to Herefordshire residents.

Better Care

The Better Care Fund was established by central government to bring health and social care services together in order to join up services more effectively. In September 2014, Herefordshire Council and the Clinical Commissioning Group submitted plans which after some revisions were approved in February 2015.

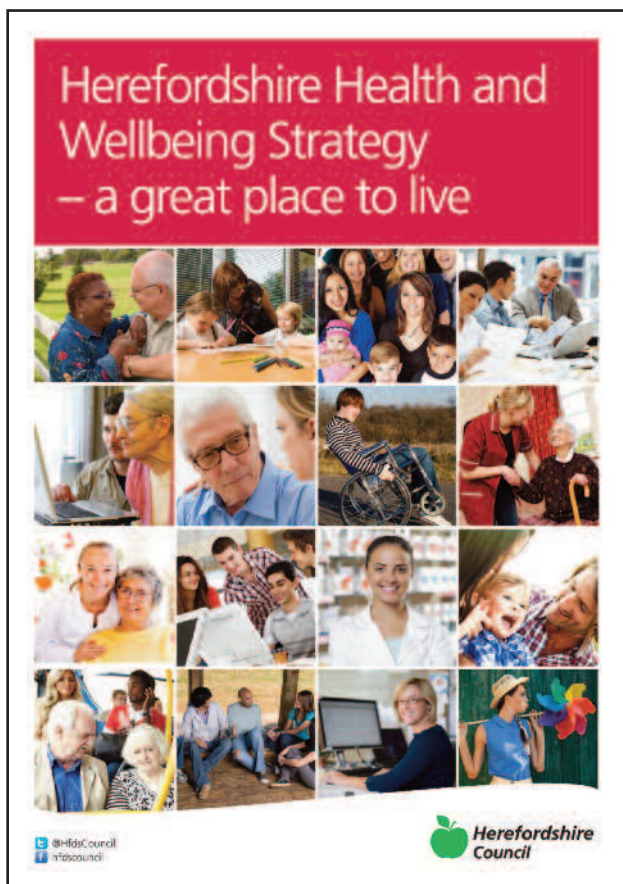
These plans focus on three key areas:

- Minimum protection of social care;
- Community health and social care services redesign, and
- Managing the care home market.

Within each of these schemes are a number of planned developments designed to join up health and social care systems. This work is due to deliver improvements in specific areas such as admissions to hospitals, falls-specific admissions to hospitals, delayed transfers of care and reduced permanent admission to residential and nursing homes.

Health and Wellbeing Strategy

A health and wellbeing strategy was developed during 2014/15. The strategy was developed following a detailed involvement and engagement programme with all stakeholders, including the public, to identify priority areas for Herefordshire. Seven priority areas were identified, the top three being mental health, children and young people and older people. This strategy has subsequently been approved and multi-agency action plans will be implemented during 2015-16 focussing on keeping people well, reducing health inequalities and promoting self-help.



Bringing staff together to provide joined up services

During the year mental health assessment and care management staff and public health staff were incorporated into the adult and wellbeing structure in order to boost preventative work and provide a more joined up service for clients.

Public Health

The Public Health function in Herefordshire has contributed significantly to improving the Health and Wellbeing of our residents at both a high, strategic level and at a practical day to day level too.

Underpinning the Health and Wellbeing Strategy, a Joint Strategic Needs Assessment was completed identifying the current and future health and care needs of Herefordshire. This supports the planning and commissioning (buying) of health, well-being and social care services each year.

In addition, work to ensure the delivery of services to ensure Health Checks, Stop Smoking initiatives, Drugs and Alcohol Services and Sexual Health, through appropriate market tendering was undertaken.

Transitions

As part of the Care Act and the Children's and Families Act, there are new responsibilities placed on local authorities in respect of the transition of young people from children's to adult services. Although there is no requirement within the Care Act that there should be a specific transition worker or team, the guidance and regulations for the Act state that local authorities should consider the use of specialist workers. The adult and wellbeing directorate funded a 12 month pilot project involving the establishment of a transitions team in 2015-16. The team will constitute a full time senior practitioner and two full time assessment and enablement officers.

The team will work with young people from the age of 15, their carer's and families, providing help with educational reviews, offering advice and guidance and making sure assessments and care plans are in place for transitioning to adult services.

Peer Review

In June 2014, a peer review team from outside the county came to assess how we were delivering the changes needed to meet current challenges. This team included a number of senior managers from across the West Midlands region and two Experts by experience, people who receive services in other Authorities.

Peer review findings

They said	We did
We needed to consider how personalisation is delivered within Herefordshire, allowing service users in Herefordshire more choice, control and creativity over the services they receive.	We appointed an expert by experience to the post of personalisation lead.
We needed to develop our commissioning activities using co-production; involving service users in the design stage.	Our personalisation lead has worked with the Making It Real Board to involve them more in the development of some of our services. This remains a continuing priority for us.
We needed to refresh our direct payment policy.	A new direct payments policy has been produced which focusses more on achieving outcomes for service users.
We needed to review our pathway to explore the potential of early intervention and reablement.	A new reablement service was launched in July 2014.
We needed to improve the safeguarding board arrangements and operational safeguarding activities.	The board has been strengthened and a new, more person-centred process is now in place for safeguarding adults.
We needed to improve a number of systems, policies and procedures in order to help staff to carry out their roles more easily.	Systems are continually being developed, improving documentation and performance information. We have piloted mobile working in teams allowing staff to work more flexibly. A review of corporate governance arrangements is currently underway.



Jonathan's story continues

An update to Jonathan's story...

CASE STUDY

After seven years of planning, paperwork, persuading and processes, Jonathan Hunt is finally to see his dream of independent living come true.

Jonathan's story is a unique one: he has learning difficulties and mobility problems. He also has severe seizures. In 2013/14's Local Account we reported how Jonathan was using his direct payments to employ personal assistants to support him to enjoy a good quality of life and participate in the activities that he enjoys.

Although enjoying life, Jonathan and his family dreamed of him being able to live independently. Following a generous donation of land to a housing association from a Charitable Trust, plans for a bungalow were drawn up designed specifically to meet Jonathan's needs. It included an adjoining bungalow for his parents so that they could be close by to support him when required.

In 2014/15 this dream became a reality. Part funded by housing association Stonewater and part funded by Jonathan and his family, the first brick was laid and his new custom-designed bungalow began to emerge. At the time of writing, he was choosing colour schemes and kitchen cabinets.

"Jonathan has been saving up over the last few years so that he can furnish his new home – as he spends most of his time on the carpet, it is important we get him a good quality, hard wearing carpet that is comfortable for him to move around on," said his sister Sarah. She continued, "Jonathan always reacts positively to anything sensory like bright colours: colour and texture play a very important part in the design."



The bungalow is open plan with overhead tracking so that Jonathan will be able to access every room and be as independent as he wants to be.

"We can also get different slings and hoists so that he can walk from room to room if he chooses to. Stonewater's contractors have brought the bespoke design to life and Jonathan is very excited about it. He always knows when he is somewhere different – he makes lots of happy noises and claps. I think he will think he's on holiday when he first enters his new home."

Jonathan still enjoys music, going to the pub and visiting the local farm. When he moves into his new home, the council will increase his support so that he can receive 24 hour care in line with his care package. Thanks to the housing association, council and his family all working together on his behalf, he will get a much better quality of life.

How are we doing?

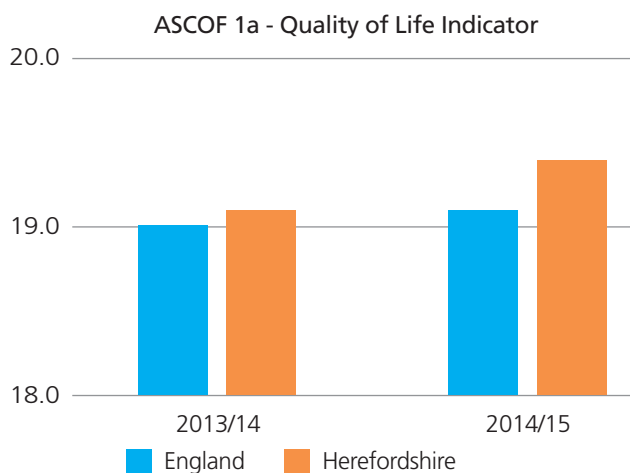
Every year the local authority has a statutory duty to report its performance to the Department of Health. This is done against a set of measures known as the Adult Social Care Outcomes Framework (ASCOF). You can see a summary of our performance against the outcomes on page 23. The following four areas provide more detail.

1. Improving the quality of life for people with care and support needs

Annual survey

Every year we conduct a survey using a sample of people who use our services. This sample is selected in a way that ensures we get a good cross section of people who use our services, covering a range of needs and ages.

The survey generates an overall social care related quality of life indicator, ASCOF 1A, which amalgamates the responses of individuals to a number of key questions within the survey. This year, our result has improved compared to last year, over and above the average improvement made by English authorities.



Listening to Herefordshire people

We have listened to what people who use services have told us. Working with them and their personal assistants, we have developed a bespoke training programme for personal assistants in Herefordshire. This is an accredited programme enabling personal assistants who complete the course to get a diploma in Health and Social Care.

Listening to people's concerns

There were 80 complaints received in the adult and wellbeing directorate during 2014/15. The majority of these complaints related to changing care packages and finances, a few were about the attitude of staff and some were housing-related, including the provision of Disabled Facilities Grants, homelessness services and the housing allocations service for Herefordshire (Homepoint). All complaints are taken seriously and responded to; we take a proactive approach to all complaints, learning from them and making sure that problems are not repeated.

David's story

- how direct payments have given him choice and control

CASE STUDY

David and Christine have been married for 28 years. They live in their own home with support from David's personal assistants. Without this support, it would be virtually impossible for them to manage.

"I have a degenerative genetic condition called neurofibromatosis. It started about 35 years ago. At first I was more mobile and able to move around with the help of walking sticks, but as the years have gone on, the increased pressure on my nervous system has resulted in me becoming paralyzed from the neck down. I need help to do most things. My personal assistants and my wife help me with all my personal care including feeding me, getting me washed and dressed and hoisting me into my chair."



However this doesn't stop David from enjoying life. He has a wicked sense of humour and a keen interest in history. There's nothing he doesn't know about Hereford's past and present, and he loves to visit places like Ledbury and Bromyard to attend events and enjoy some of the historic architecture. He particularly loves the black and white village trail.

"I used to go to a day centre for two afternoons and would join in whatever activities were available," said David. "It wasn't the same when the centre stopped being run by the council – it seemed to cost more and I didn't like the activities as much so I stopped going."

"I've now got into the swing of things with my direct payment and I'm thinking of going back to the centre again – I hope they put on pottery and woodwork as these are things I'd like to do."

Most of David's direct payment is used to pay for his two personal assistants. They help him with his personal care and take him out and about to the places he likes to visit. He particularly enjoys going on train journeys, attending music classes and participating in a range of courses put on by the WEA.

Before direct payments, David received some home help, mainly to get him up and dressed, but it wasn't enough and put considerable strain on his wife Christine.

Becoming an employer has presented its own challenges: Christine helps where she can and they have a payroll company to do the accounts. The biggest challenge is recruiting the right people for the job. He's been lucky with one appointment: Jackie has been with him for more than 10 years, but others tend to come and go. David said: *"Getting the right person who can meet your needs and fit in with your family is tricky."*

But overall, it's a thumbs up for direct payments. *"Direct payments have changed my life for the better – it has given me more control and allows me to do the things I want to do."*

2. Delaying and reducing the need for support

Reablement

The council commissioned Herefordshire Housing to deliver a new reablement service in July 2014. The aim of the service is to provide enhanced levels of home care, with the objective of helping people to increase and regain their previous levels of independence, following about of ill-health, or a trip or fall. This service is often supported by the provision of equipment or telecare. In the year, nearly 200 people received the reablement service, with 71% needing no on-going, or reduced support, following the short burst of reablement intervention. In addition, 77% of clients aged 65+ remained in their homes for at least 91 days following completion of the reablement service (ASCOF 2B)

Online information

During the year, with the involvement and help of the Making It Real board, we have refreshed and relaunched the adult and wellbeing pages on the council's website. The board's involvement was key to ensuring that the web information is more accessible to people with care and support needs. This will be further developed in 2015-16 as we create a new online information, advice and signposting service for Herefordshire.

Improving healthy lifestyle choices

The council's healthy lifestyle trainer service provides targeted support to help people make healthy lifestyle choices. The service gives people practical support to promote healthy eating, reduce alcohol consumption, increase physical activity, and stop smoking.

In 2014/15, the service worked with 286 individuals, covering a range of needs:

- 45% received support with diet
- 25% received support with physical activity
- 19% received support to stop smoking
- 4% received support to reduce their alcohol consumption

Overall:

- 53% achieved the objectives set out in their personal health plans
- 58% reported a rise in self-efficacy levels after the lifestyle intervention.

In the majority of cases, clients supported were from the most deprived areas of Herefordshire and nearly a third were aged between 18 and 34.

Delaying transfers of care

The number of delayed transfers of care from hospitals often known as bed-blocking, has deteriorated a little during the last year, however this is due to significant pressures on the health service. This is a story replicated across the country, and particularly within the West Midlands.

Residential care

Despite our best efforts to help people continue living independently in their own homes, it is sometimes necessary to place people in Residential and Nursing care homes to keep them safe and provide the required levels of care. In 2014-15, we placed just under 300 people in care homes on a long-term basis, 13 of which were under the age of 65. This is more than in the previous year, but the increased demand within the system and the increasingly complex needs of individuals approaching us for help and support.

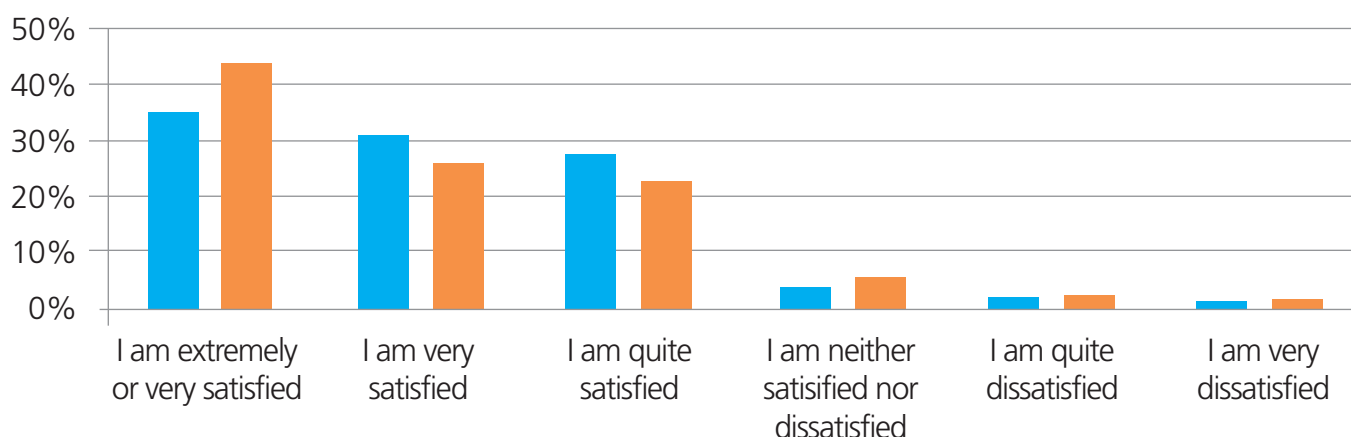
3. Ensuring people have a positive experience of care and support

Results from our annual survey show that we have a larger proportion of respondents are extremely satisfied with the care and support that they received, compared to the previous year.

Overall satisfaction has risen from 65.1% to 66.9% (ASCOF 3A). In addition there were small improvements in respondents saying that they have control over their daily life (ASCOF 1B) and those who use services who feel safe (ASCOF 4A).

How satisfied are you with the care and support you have received?

■ 2013/14
■ 2014/15



Care home monitoring

There are 60 homes providing residential care within Herefordshire (1,011 beds) and 28 homes providing nursing care (1,053 beds). The Care Quality Commission ensures that all care homes maintain a registration which regulates standards of care. To support this work, there is a rolling programme of inspections. At the time of reporting CQC had identified that eight different homes in Herefordshire required improvement.

During 2014/15, 51 homes were visited by our contracts and compliance team. During this time there were no contractual breaches, however we did identify three homes for improvement Plans were developed and implemented to resolve the concerns we had.

As part of the council’s monitoring and review process of homes in the county, surveys are sent out to both residents and staff. Across a range of key questions, 89% of pre-visit respondents answered positively about the level of care they received; this included questions such as whether they were treated with dignity and respect, whether they felt safe and secure and their overall satisfaction. 87% of residential home staff answered positively across a range of questions within their survey; including questions asking whether they were able to make suggestions to improve service delivery, whether there were clear instructions, policies and procedures and whether they believed the service provided good quality care.

In addition, there are 46 domiciliary care agencies registered within Herefordshire. 48% of these were

Carers' Survey

Every two years we survey a sample of carers in line with government requirements. Last December, the council surveyed 540 carers to learn more about carers' experiences of life, support and services in Herefordshire. 58% (311) responded, which is slightly higher than those who responded last time we undertook this survey in 2012.

Carers

- from the information gathered we know that:
 - About half of those who responded told us they have been caring for someone for between three and ten years: 7% had been caring for someone for more than 20 years.
 - The majority of carers (70%) provide more than 20 hours of care a week.
 - 38% of carers provide more than 100 hours of care a week.

People who are being cared for

- from the information gathered we know that:
 - 86% are 65 or over and 70% are aged 75+. There has been a big increase in the number of cared for people who have dementia (from 33% to 54%), a small reduction in the numbers of those with a physical disability, and an increase in those who say they have age-related conditions.

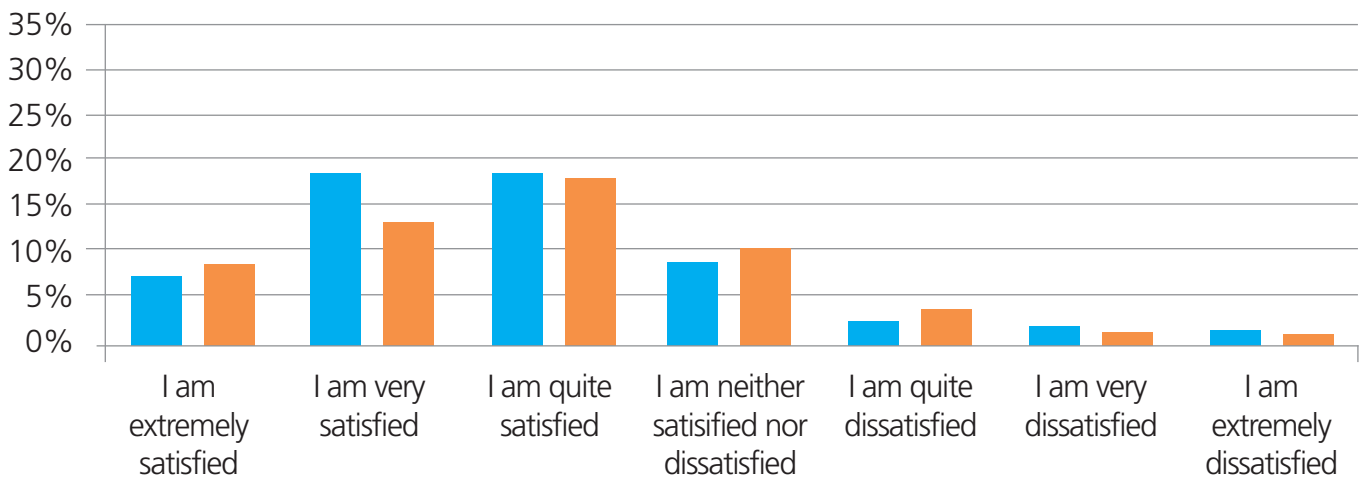
What our carers told us:

- Overall, Herefordshire carers are less satisfied with the services they received in 2014 than they were in 2012 (see graph below).
- 66% of respondents said they had used information and advice to help them as carers in the last 12 months. The majority found the information and advice helpful, although 36% found it difficult to find.
- When asked how much control they have over their daily life, 66% said they couldn't look after themselves well enough.
- Half of those who responded said they have some social contact with people, but not enough.
- Just over half of carers felt that they have some encouragement and support in their caring role, but not enough.

We recognise the valuable role of carers within our society and know that as our aging population continues to grow, demand for carer support is set to increase. We have already begun to address some of the issues raised in the survey which you can see on page xx under our plans and challenges for 2015-16.

Overall satisfaction of carers with support or services received from social services in the last 12 months

■ 2012
■ 2014



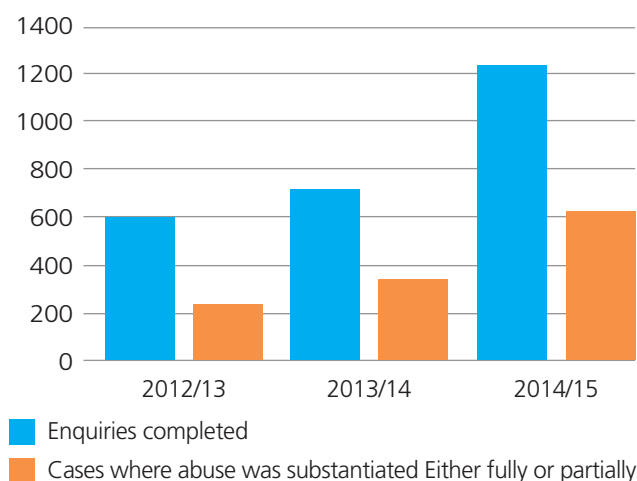
4. Keeping adults safe

Safeguarding vulnerable adults from abuse in Herefordshire is the aim of the Herefordshire Safeguarding Adults Board. In 2014/15 this board has made several changes to ensure compliance with the Care Act, including the appointment of an independent chair.

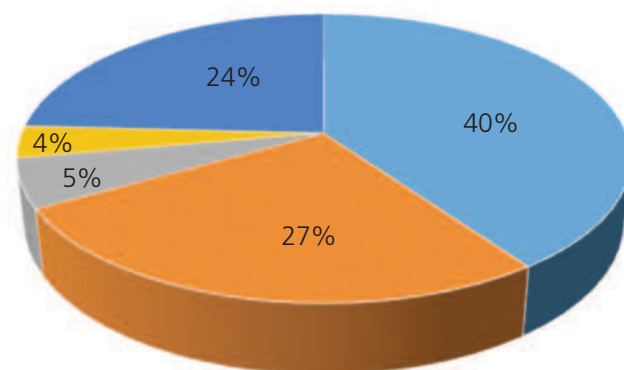
During the year, 1845 concerns were reported to the safeguarding team. A concern is a notification from the public or from professionals suggesting that they were worried about someone, or that there may be abuse. Following verification of the information received, a concern might progress to an enquiry where thresholds of abuse appear to be met. There were 1237 safeguarding enquiries completed last year.

This number is significantly higher than in previous years as we have made real efforts to complete and close a number of older pieces of work in order to cleanse our system, prior to the implementation of our new making safeguarding personal process. The graphs below show the types of abuse recorded in the year and the places where abuse took place.

Safeguarding enquiries

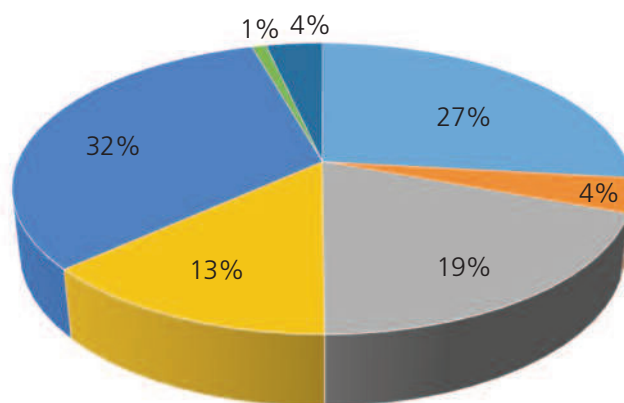


Place of Abuse



Abuse occurred in own home	497
Abuse occurred in care home	329
Abuse occurred in hospital	67
Abuse occurred in community services	45
Other location	299

Type of Abuse



Physical Abuse	420
Sexual Abuse	61
Psychological/Emotional Abuse	302
Financial Abuse	210
Neglect	507
Discriminatory	14
Institutional Abuse	55

We know that a number of incidents of abuse take place within residential and nursing homes; because of this we work very closely with our care providers in order to keep people safe.

Making Safeguarding Personal

One of the big changes that we have achieved as a result of implementing Making Safeguarding Personal is to improve the way concerns are managed: we are now making decisions on whether a reported incident meets the threshold of abuse in a more timely fashion and only referring the most relevant safeguarding cases to operational teams to investigate. Success of our Making Safeguarding Personal implementation will be assessed by a peer review group in September 2015. The results will be published in next year's Local Account.

	2013/14	2014/15	Quarter 4 14/15
Percentage of cases identified as meeting the safeguarding threshold	50.3%	45.7%	39.6%
Percentage of cases where the threshold decision is made within 2 working days	56.7%	65.0%	71.2%
Percentage of cases closed within 28 days of the decision to refer to safeguarding enquiries	41.4%	33.9%	21.3%

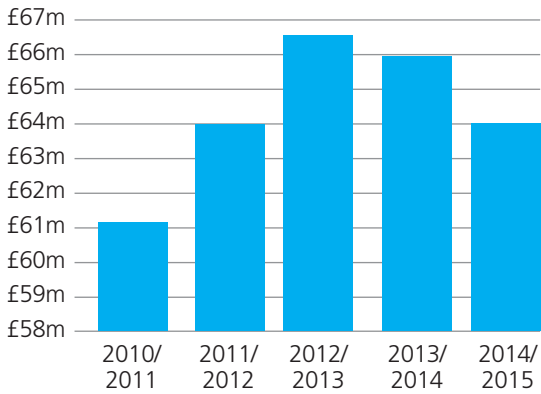


Deprivation of Liberty Standards

Following significant changes to case law around Deprivation of Liberty Safeguards, we have seen a large increase in the number of applications received during the year. In 2014/15, there was a huge increase to 783 applications, from 83 in the previous year. This is consistent with our statistical neighbours, who have seen similar increases. Of the applications raised, 24% applications have been granted, however a significant number were awaiting a decision at the time of reporting because of a shortage of assessors in the area. These safeguards are applications to deprive someone of their liberty in a safe and correct way, in the best interests of the individual.

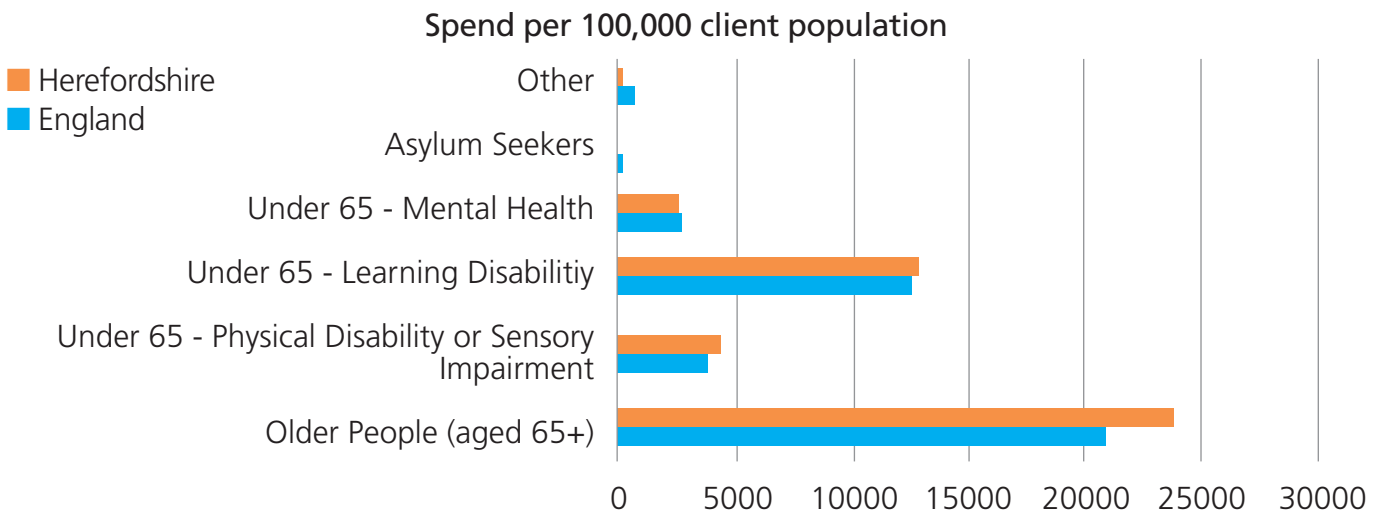
Spending and service levels

The graph below shows the trends on total adult social care spending over the last five years. Recent downward trends in spending reflect the levels of savings required by all local authorities.



In Herefordshire, we commission a range of services to provide residents with the levels of support needed to keep them in the safest and most appropriate placement, based on their needs.

Herefordshire supports a similar proportion of clients to statistically similar neighbours, those who have similar demographics and deprivation to us. However as can be seen from the graph below, based on last year's data, Herefordshire spends more per 100,000 client population in client categories where we support the greatest number of clients, such as older people and learning disabilities.



The table below shows average weekly spend in Herefordshire compared to the English Average. Again, in areas of most common spend, such as residential and nursing for older people and home care, the average weekly costs are higher than the national average. This places pressures on Herefordshire and supports our need to change the way that services are to be provided in the future.

	Herefordshire	England Average
Residential/Nursing Care – Older People	£ 605	£ 537
Residential/Nursing Care – Learning Disabilities	£ 1324	£ 1336
Residential/Nursing Care – Mental Health	£ 712	£ 753
Residential/Nursing Care – Physical Disabilities	£ 914	£ 850
Home Care	£ 256	£ 219
Direct Payments	£ 280	£ 225
Day Care	£ 199	£ 227

• Financial comparisons based on 2013/14 data due to availability of updated comparator information for 2014/15

Our plans and challenges for 2015/16

Reducing the need for long term care by keeping people healthy for longer

People have better lives when they live independently. In addition more people are living longer and there's less money around to pay for care. This means we will not be able to provide services in the way we have done in the past, so we have to work with communities and residents to change our approach to care. We must promote self-help and boost local community support so that we can help the most vulnerable and needy people with the resources we have.

Some of the key activities planned for the next 12 months to meet these challenges are:



Meeting increased demand from carers

We are planning to launch a new health and wellbeing service for carers in October 2015 that is able to provide support for more people and is designed to give carers choice and control. It's not just about providing respite or sitting services, although carers may choose to spend their allocation on these if they wish. It's about looking after carers' health and wellbeing so that they can enjoy their life, be happy and stay healthy and continue to provide support

It is hoped to have the new service up and running by the end of the 2015.



Direct payments and pre-paid card promotion

Pre-paid cards give people more choice and control over how they choose and pay for their care and support. They also take away the monthly monitoring requirements which make life much easier for everyone. In the autumn of 2015 we will be bringing in a new pre-paid card system and encourage existing customers to make the switch. New customers will automatically be offered a direct payment card if they are eligible for help with care and support.



Improving access to quality information

We are commissioning a wellbeing, information and signposting hub, WISH, to provide comprehensive information on wellbeing and social care. This will include an online directory of activities and services available in local communities. People will be able to access this service either by phone, face to face or online. The new service will be up and running in the autumn 2015.

Online self-assessments

We are developing online tools as part of the implementation of the new health and wellbeing website for Herefordshire (above). These tools will help people better understand their needs, direct them to personalised information and services that might help them and indicate if they may be eligible for support from the council.

Keeping people safe

We will be continuing to embed and fine tune our new processes throughout the year and in September 2015, we will be inviting in a Peer Review to assess our safeguarding performance. This will bring in a number of Experts by Experience and senior managers from other authorities within the West Midlands to view our processes and performance and provide us with challenges and areas for further improvement.



Boosting the marketplace

We will be producing a market position statement in the autumn 2015 which gives local organisations and providers valuable information about the future of the county. As well as demographics, this identifies future needs and demands and forms the foundation for our relationship with the care and support market. It sets out our ambitions for working with providers to encourage the development of a diverse range of care and support options.

Health and wellbeing strategy

With our partners we will talk to residents, organisations and health professionals to further define how we will meet the identified health and wellbeing priorities. We will produce a health and wellbeing strategy action plan setting out how these priorities will be addressed. The aim will be to keep people healthy and well and out of long term care.

Better Care

To work collectively to deliver against the three schemes agreed in our Better Care plans:






















- Minimum protection of social care
- Community health and social care services redesign
- Managing the care home market

Throughout 2015, we will be working with communities to help them become more sustainable. We want them to be able to support people to remain within their communities, rather than these individuals becoming dependent on social care services. Ideas under development include, but are not limited to, the set up and running of “pop up” clinics within the community (e.g. GP’s, village halls, pubs, etc.), improving the availability of information on community groups, and awareness and education of available support and prevention services.

Adult Social Care Outcomes Framework - The national set of measures that all local authorities have to report on.

The table below compares the performance of Herefordshire, this year and last year, with the English average for last year.

Updated English averages will be available later in the year.

	2013/14		2014/15	
	England	Hereford	Hereford	Improvement
Social care quality of life	19	19.1	19.4	
Proportion of people who use services who have control over their daily life	76.8%	77.3%	77.8%	
Proportion of people using social care services who receive self-directed support, and those receiving direct payments	61.9%	62.1%	87.3%	
Proportion of people using social care services who receive a direct payment	19.1%	14.9%	24.6%	
Carer reported quality of life	-	-	7.6	
Proportion of adults with a learning disability in paid employment	6.7%	4.5%	6.0%	
Proportion of adults in contact with secondary mental health services in paid employment	7.0%	7.1%	10.4%	
Proportion of adults with a learning disability who live in their own home or with their family	74.9%	77.0%	52.4%	
Proportion of adults in contact with secondary mental health services living independently, with or without support	60.8%	50.5%	76.0%	
Proportion of people who use services, and their carers, who reported that they had as much social care contact as they wanted	44.5%	46.0%	46.2%	
Permanent admissions to residential and nursing care homes, per 100,000 population, aged 18-64	14.4	20.4	14.93	
Permanent admissions to residential and nursing care homes, per 100,000 population, aged 65+	650.6	607.5	608.7	
Proportion of older people (65 and over) who were still at home 91 days after discharge from hospital into reablement/rehabilitation services	82.5%	83.3%	77.0%	
Delayed transfers of care from hospital which are attributable to adult social care	9.6	5.7	7.8	
Delayed transfers of care from hospital which are attributable to adult social care	3.1	3.1	4.3	
Overall satisfaction of people who use services with their care and support	64.8%	65.1%	66.9%	
Overall satisfaction of carers with social services	-	-	38.6%	
The proportion of carers who reported that that have been included or consulted in discussions about the person they care for	-	-	71.1%	
The proportion of people who use services and carers who find it easy to find information about support	74.5%	73.20%	74.5%	
The proportion of people who use services who feel safe	66.0%	67.10%	70.9%	
The proportion of people who use services who say that those services have made them feel safe and secure	79.1%	85.5%	83.9%	

- All Herefordshire results are based on first cut data submissions and are awaiting final validation.
- Carers survey are only calculated bi-annually, therefore three measures were not calculated in 2013/14.

Further information

Useful information

1. Access to adult social care

Adult social care enquiries: 01432 260101

ASCAdviceandReferralTeam@herefordshire.gcsx.gov.uk

2. WISH

www.WISHerefordshire.org.uk

3. Healthwatch Herefordshire

01432 364481

www.healthwatchherefordshire.co.uk

4. Care Quality Commission

The independent regulator of all health and social care services in England.

03000 616161

www.cqc.org.uk

Further reading

1. Facts and figures about Herefordshire

www.factsandfigures.herefordshire.gov.uk

2. Making it Real

www.thinklocalactpersonal.org.uk/

3. Spotlight on adult and wellbeing

www.herefordshire.gov.uk/subscribe

Sign up to receive an email alert every time we publish a new edition of Spotlight on adult and wellbeing, our regular newsletter for people interested in adult social care

www.herefordshire.gov.uk



Meeting	Cabinet
Meeting date	15th October 2015
Title of report:	Adult and community learning plan 2015-2018
Report by:	Senior adviser post 16 learning and skills

Classification

Open

Key Decision

This is a key decision because it is likely to be significant in terms of its effect on communities living or working in an area comprising one or more wards in the county.

NOTICE has been served in accordance with Part 3, Section 9 (Publicity in Connection with Key Decisions) of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012

Wards Affected

Countywide

Purpose

To approve the adult and community learning plan 2015/18

Recommendation(s)

THAT:

- (a) the Adult and Community Learning Service's (ACLS) delivery and outcomes for 2013/2014 be noted;**
- (b) the Adult and Community Plan for 2015/2018 (at appendix a) be approved;**
- (c) the expenditure of the grant allocation for the academic year 2015/16 from the Skills Funding Agency (SFA) against priorities identified be approved; and**
- (b) the Fees Policy for 2015/2016 academic year (at appendix b) be approved.**

Further information on the subject of this report is available from
Alexia Heath, senior adviser post 16 learning and skills on Tel (01432) 383416

Alternative options

- 1 Herefordshire Council contracts out the delivery of Adult and Community Learning. All delivery of learning is done through subcontracts with the council retaining funding for its management of the provision. Alternative delivery options are as follows:
- 2 Direct Delivery – all delivery is done in house by council staff. The council would have to recruit tutoring staff to deliver the learning programmes. The council would be better able to shape and change the provision and direction of the service in order to respond to changing priorities and identified needs. It is also widely acknowledged that Local Authorities know their communities very well, and are better able to link together the identification of gaps and needs with provision and services that can respond.
- 3 The main disadvantage to direct-delivery is the potential redundancy costs if external funding is reduced or withdrawn. Additionally there can be niche areas which require specialist skills and knowledge in order to create provision to meet this need, if the organisation does not have those skills within its team it would be difficult to meet the need. In this instance it would be better to contract with an organisation that already had those niche skills.
- 4 Hybrid – a mixture of both direct delivery and subcontracting. This can vary greatly in the % split between direct and subcontracted provision. The hybrid model can have both the advantages and disadvantages of both direct delivery and sub-contracted models. The extent to which they manifest is largely determined by the percentage of split between direct delivery and subcontracting.
- 5 Herefordshire Council could decide not to deliver adult and community learning and give notice to the Skills Funding Agency (SFA) and hand back the contract. There is no guarantee that this funding would be reallocated to another provider in Herefordshire and could result in a loss of £509k to invest in funding education and training provision in our most deprived wards and disadvantaged residents. It would also mean a loss of funding to sub-contractors the majority of whom are local voluntary and community organisations which in turn would lead to job losses. Furthermore in addition there would be redundancy costs to Herefordshire Council.

Reasons for recommendations

- 6 The recommendations are made to ensure effective spend of the SFA grant against relevant government and Herefordshire Council priorities and to set a fair fees policy.

Key considerations

Background

- 7 The community learning funding allocation which includes family learning programmes is historical and goes back to the time when Herefordshire and Worcestershire local authority split. Herefordshire Council was a new unitary authority and an allocation was made nationally. This allocation following a business case was increased in 2004. The amount allocated each academic year of £340k has not changed for 10 years. The Department for Business Innovation and Skills (BIS)

Further information on the subject of this report is available from
Alexia Heath, senior adviser post 16 learning and skills on Tel (01432) 383416

has invested £210m in community learning nationally every year since 2005. Therefore in real terms it has been eaten away by inflation.

- 8 The adult skills budget (ASB) allocation is based on the previous academic year's performance, national priorities and national funding settlement. 2013/2014 academic year was the first year of ASB delivery for the adult and community learning (ACL) service and the allocation was based on the Formal First Steps allocation from the previous year. Formal first Steps funding became part of the ASB single funding stream in 2013/2014.
- 9 The adult and community learning plan sets out the plans for the delivery of adult and community learning by Herefordshire Council in Herefordshire for the period 2015/2018. The adult and community learning service are funded by the SFA. In 2014/2015 academic year a grant allocation of £540,723 of which £340,972 was for community learning and £199,751 adult skills budget was available to plan, manage and deliver learning. For 2015/2016 the grant allocation is £509k. National government policy has seen the adult skills element of the funding allocation cut by 24% for the academic year 2015/2016.
- 10 For 2013/2014 academic year we engaged 1058 learners on community learning courses with a success rate of 99.5% above benchmark of 91.4%. For the ASB 190 learners were supported with a success rate of 80.45% above the SFA minimum level of performance. 2014/2015 verified data is not yet available.
- 11 There are five recognisable key benefits from participating in adult learning: greater likelihood of finding a job or staying in a job, improvements in health, more likely to volunteer, social value and improving family life chances. Encouragingly unemployment in Herefordshire is falling but we are continuing to work with job seekers to help them to develop their skills and employment opportunities impacting on Herefordshire economy. We target provision at adults with low level skills to support them to increase their Maths, English and ICT skills which have been highlighted as key priorities by local employers. The ICT training supports people to be able to access on-line services essential to Government and Herefordshire Council's digital agenda. Family learning provision is aimed at supporting parents to develop their basic and parenting skills resulting in improving family life chances.
- 12 We work with communities such as Gypsy Roma Travellers, care leavers, adults with low level skills, adults with learning difficulties and or disabilities and others who could without adult and community learning provision be at risk of social exclusion.
- 13 The impact of adult and community learning is irregular and very personal. There is no comparator data as yet. Our challenge is how we document this impact in a clear systematic way. For 2013/2014 we contacted 893 learners to see how they had used the skills that they had gained since leaving their course. 275 (30.9%) responded of which 47.6% progressed onto a further course, 55.6% improved physical/mental health, 38.9% more active in local community, 18% found paid work, 16.3% became a volunteer.
- 14 The skills funding letter (or statement) is published annually by the Department of Business Innovation and Skills (BIS) and sets out the government's funding priorities for the adult skills system. It includes information for the Skills Funding Agency to set provider allocations.

- 15 The 2015 to 2016 letter reflects the reforms in ‘Rigour and Responsiveness in Skills’, published in April 2013, and focuses on delivering the skills that employers and individuals need.
- 16 The government is funding high quality provision that delivers good value for money, and concentrates on young adults aged 19+, the low skilled and those who are unemployed.
- 17 Funding is focussed on qualifications that are part of a regulated framework approved by the Skills Funding Agency. Providers must operate within the terms and conditions of the funding agreement, the funding rules, the performance management rules and the individual learner specification. The funding rules form part of the terms and conditions of funding. The rules set out the requirements that providers must comply with to make sure public funding is protected.
- 18 Herefordshire’s adult and community learning service (ACLS) will focus adult skills funding to provide accredited learning, targeted primarily at learners who require up-skilling to improve their employment opportunities.
- 19 Where possible, the delivery of the service will target the localities of Herefordshire to ensure fair access to all learners who have been identified by the engagement process of the contract, or would like to access accredited learning, to improve their chances of employment, or further the opportunities of employed learners subject to eligibility.
- 20 The council does not intend to fund provision above Level 3 or duplicate provision already available from institutions delivering further or higher education within Herefordshire unless a need is clearly identified.
- 21 The overall purpose and objectives for community learning are set by the Department for Business, Innovation and Skills (BIS) in the White Paper ‘New Challenges, New Chances’. The SFA requires the community learning allocation of £340,972 to be used to:
- Maximise access to community learning for adults, bringing new opportunities and improving lives, whatever people’s circumstances
 - Promote social renewal by bringing local communities together to experience the joy of learning and pride that comes with achievement
 - Maximise the impact of community learning on the social and economic well-being of individuals, families and communities.
- 22 The aim of the Herefordshire ACL Plan is to deploy the SFA funding to ensure that local people have access to a range of appropriate learning opportunities that will contribute to their personal, social, educational and economic development. The strategic aims, objectives and key priorities for 2015-2018 can be found on pages 3 to 7 of the Adult and Community Learning Plan attached at appendix a.
- 23 The services described herein will be delivered using the council’s existing multiple supplier framework for adult and community learning. This framework contract was awarded in 2013 in accordance with council contract procedure rules. For further information on how the service is delivered, please refer to pages 11-14 of the ACL plan.

- 24 **Fees Policy** - The community learning curriculum area provides a 'universal offer' (as part of SFA requirements) for community learning. These courses are open to everyone with the exception of courses within the skills for Independent Living (SfIL) contract. In line with SFA and Herefordshire council priorities, learners who can afford to pay should be charged a fee which contributes to the Pound Plus elements of the Community Learning Plan, with the exception of courses within the SfIL contract. Pound plus is a new term that describes how learning providers can show how they are maximising the value of public investment. Pound plus refers to additional income (and savings) generated by providers over and above core income from Government's Community learning funding. This includes income generated through course fees, financial sponsorship, access to accommodation made available at no or reduced cost, the use of volunteer workers, donations of equipment or consumable items, and access to other funding sources or grants. It is up to the individual provider (in this case Herefordshire Council) to set an appropriate fee for these community learning courses. Herefordshire Council's Adult and Community Learning Plan sets out its priorities and its target groups. Emerging from this plan it has established the fees policy for learners on community learning courses at £4.50 per hour. See appendix b for more details of the fees policy.

Community impact

- 25 The ACLS aim is to engage with local people who are least likely to participate in learning and enable them to access a range of high quality learning opportunities, so that they can lead more independent lives, support their families, gain a qualification, get a job, volunteer and become less socially isolated.
- 26 The ACLS works with local partners to deliver a programme of high quality learning, which clearly contributes to the priorities of:
- Herefordshire Council's Corporate Plan (to create and maintain a successful economy; enable residents to be independent and lead fulfilling lives, keep children and young people safe and give them a great start in life, enable residents to live safe, healthy and independent lives);
 - the Health and Wellbeing Strategy vision 'Herefordshire residents are resilient, lead fulfilling lives, are emotionally and physically healthy and feel safe and secure'; and
 - the Marches Local Enterprise Partnership Skills Plan, European Investment Strategy and Strategic Economic Plan.
- 27 In particular the Family Learning programmes support the priorities of the Children and Young People's Partnership by:
- Targeting resources and supporting vulnerable families into learning
 - Improving the emotional and mental health and wellbeing of parents and carers
 - Helping families, parents and carers to help themselves
 - Promoting health and wellbeing e.g. cookery, Nordic walking, coppice crafts
 - Achieving success in life, learning and future employment e.g. English and Maths provision
 - For further information please see pages, 6, 7 and 8 of the ACL plan for links to key national Government and local drivers.
 - Fees Policy - Generating additional income and revenue is central to the objective of driving up participation in community learning within a very

constrained public funding environment. Learners who can afford to pay are charged a fee for community learning of £4.50 per hour with the exception of SfiL courses where 'A consistent Fees Policy is required to ensure that adults within Herefordshire are treated equitably by each delivery partner within the Herefordshire Council's Adult and Community Learning Provider Network. The fees policy for 2015/16 is attached at appendix b and remains unchanged from 2014/2015.

Equality duty

- 28 This report pays due regard to the Human Rights Act, Equality Act 2010 including section 149, the 'General Duty' on public authorities.
- 29 The ACLS seeks to provide high quality learning opportunities that are inclusive and free from discrimination. The service aims to make learning opportunities available across the county particularly focusing on recruiting learners from the most deprived areas of Herefordshire and from key target groups as listed in the adult and community learning plan 2015-2018.
- 30 Equality of opportunity is an important aspect of raising aspirations, self-esteem and achievement. The ACLS aims to provide learning that is safe, accessible and welcoming. Discriminatory behaviour or harassment will not be tolerated.
- 31 As a contracted-out service we require all our providers to comply with the Equality Act 2010 and actively promote equality and diversity in the delivery of ACLS provision, as outlined in the Common Inspection Framework.
- 32 Staff and providers and tutors are supported and developed through equality and diversity mandatory training and through the tutor handbook. Equality and diversity is also embedded within the Observation of Teaching and Learning process.
- 33 Equality and diversity provider performance is monitored against targets, policies and procedures and act on any inequalities highlighted.
- 34 An equalities impact assessment has been carried out and is attached at appendix c.

Financial implications

- 35 The SFA grant for the academic year 2015/2016 is £509,945 and it is expected that this will be fully utilised delivering the services set out in the adult and community learning plan 2015/2018. The adult and community learning service team is fully funded by the SFA grant.
- 36 A consistent fees policy is required to ensure that adults within Herefordshire are treated equitably by each delivery partner within the ACLS provider network. The proposed Fee Policy is attached at appendix b.
- 37 It is proposed that the Fees Policy remains unchanged from the 2014/2015 policy.

Legal implications

- 38 The council is required to comply with all relevant legislation and any statutory guidance issued.

Risk management

- 39 The ACLS manages risk through a risk assessment process. Risks identified for 2015/2018 are:
- Provider underperformance or failure – mitigated by robust contract management process and procedures
 - Poor Ofsted inspection result – mitigated through the high focus on quality improvement within the service.

Consultees

- 40 The adult and community learning plan has been informed by the network of sub-contracted learning providers, the Herefordshire Community Learning Partnership, learner feedback, performance data, government and local priorities.

Appendices

Appendix A Adult and Community Learning plan 2015 -2018

Appendix B Fees Policy 2015-2016

Appendix C Equality Impact Assessment

Background papers

- None identified.



Herefordshire Council Adult and Community Learning Plan 2015/18

Reviewed June 2015
Next review due: Jan 2016

Funded by



Skills Funding
Agency

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Introduction

This plan identifies the key priorities for Herefordshire Council's Adult and Community Learning Service to achieve its strategic and organisational aims for the academic years 2015 to 2018. The plan covers the funding received from the Skills Funding Agency (SFA) annually to deliver Community Learning and Adult Skills Learning opportunities to Herefordshire residents aged 19 and over. This plan is reviewed annually in January and updated again in June in each year.

In particular this plan:-

- gives an introduction to Herefordshire
- summarises the requirements of the Skills Funding Agency (SFA). The requirements are updated annually.
- identifies the key priorities and aims of the service for next three years
- includes the fees policy for 2015/2016
- gives the key results from 2013/2014 academic year (latest full academic year performance data).
- includes the Service action plan 2015/2016

1. An introduction to Herefordshire

For a comprehensive review of Herefordshire please read 'The Understanding Herefordshire report' <https://factsandfigures.herefordshire.gov.uk/>

2. An introduction to Herefordshire Council's Adult and Community Learning Service.

Herefordshire Council provides Adult and Community Learning through the Herefordshire Council's Adult and Community Learning Service. The service consists of a small team that sits within the Post 16 Learning and Skills team in the Education and Commissioning Directorate, Children's Wellbeing. Please see the team structure chart at Appendix A. The adult and community learning team are fully funded through the SFA contract and are therefore dependent on the successful delivery of provision.

We commission and contract out which means we do not employ our own tutors; we work with partners to deliver adult learning opportunities and the priorities that we set; encourage social, economic, educational and personal progression for individuals and families.

We work with delivery partners to ensure adult education courses are available for local residents within priority areas. Delivery partners include voluntary and community organisations, FE colleges, private training providers, schools, children's centres and libraries. To deliver non- accredited, entry and level one and two provision.

The service is subject to Ofsted Inspections and was awarded an Overall grade of 2 'Good' in the last inspection in May 2012. The Ofsted inspector awarded a Grade 1 in community development.

Strategic Aims and Objectives

The strategic aims and objectives are as follows:

Aim

To engage with local people who are least likely to participate in learning and enable them to access a range of high quality learning opportunities. So that they can lead more independent lives, support their families, gain a qualification, get a job, volunteer and become less socially isolated.

Objectives

- Focus Adult and Community Learning funding on people who are disadvantaged and least likely to participate in learning, including people on low incomes, those with low skills and those furthest away from the labour market.
- Widen participation in learning through locally delivered informal and accredited programmes, serving the needs of the diverse communities across Herefordshire.
- Contribute to a wide range of outcomes for individuals and the wider community including personal and social, educational attainment, economic regeneration, and improved health and well-being. By supporting adults back into learning, training and employment, through community outreach provision delivered at local venues.
- Develop the capacity of voluntary and community sector organisations to deliver effective adult learning that meets the quality requirements of Ofsted through funding and supporting niche provision.
- To work with local partners to deliver a programme of high quality learning, which clearly contributes to the priorities of Herefordshire Council (to create and maintain a successful economy; enable residents to be independent and lead fulfilling lives; keep children and young people safe and give them a great start in life; enable residents to live safe, healthy and independent lives) and the Marches Local Enterprise Partnership Skills Plan, European Investment Strategy and Strategic Economic Plan.

Key Priorities

In order to achieve the above objectives, we will:

- Widen adult participation in learning through a targeted approach, promoting equality and diversity and improving access to learning for particular under-represented groups and those who have not been engaged in learning for a significant period of time. In particular the service will continue to work with those people who are:
 - unemployed.
 - people with a learning difficulties and/or disabilities, including mental health issues.
 - homeless, or in danger of becoming homeless, or living in sheltered accommodation.
 - carers of people with learning difficulties and/or disabilities, including mental health issues.
 - care leavers
 - yet to achieve a prior level of attainment at full level 2 qualification.

- yet to achieve level 2 in English and Maths
 - engaged within the troubled families programme (Families First¹)
 - wishing to improve their parenting skills.
 - from areas identified as local areas of deprivation²
 - on low income (below £16,000) and/or in receipt of state benefits.
- Lead on the delivery of Family Learning in partnership with schools and children's centres in deprived areas where attainment levels are low. Programmes will be developed to directly contribute to the children centre's aims and objectives for supporting families in their areas with a particular focus on English and Maths. The service works with families including grandparents of children aged 0-16.
 - To develop learning opportunities for our young people leaving care aged 19 and over.
 - Continue to increase the number of learners achieving successful outcomes, increase the numbers of people gaining first accreditation in community-settings and increase the numbers progressing to further learning and work.
 - Continue to develop the Adult Skills 'offer' and provision for learners in areas of high socio-economic need.
 - Work with partners to continue to develop the Herefordshire Community Learning Partnership. In particular to develop further opportunities for those people with mild to moderate mental health issues including impact measures.
 - Ensure learners have access to high quality information advice and guidance, sign-posting to the National Careers Service.
 - Continue to improve the planning and commissioning of ACL so that we develop an improved analysis of needs, to improve further the quality of teaching and learning, outcomes for learners and value for money.
 - Replace AQUA MIS system.
 - Attain Matrix Standard.
 - Develop and expand the 'LearnHerefordshire' website
 - Embed quality improvement across all provision and address issues identified in the self-assessment reports and quality improvement plans
 - To achieve OfSTED Grade 2 or above in next inspection.

3. National Drivers - Requirements of Providers Directly Funded by the Skills Funding Agency (in 2015-2016)

Adult and Community Learning is funded through a contract with the Skills Funding Agency (SFA) for Community Learning and Adult Skills.

The Council is required to:

- commission, deliver and support a locally determined formal and non- formal learning offer that conforms to the objectives set out in New Challenges, New Chances

¹ [Families First in Herefordshire](#)

² [Deprivation in Herefordshire](#)

- operate in strong local partnerships to ensure their plans and strategies are underpinned by engagement with communities, local authorities, LEPs and other key local stakeholders.
- operate within the terms and conditions of the SFA funding agreement and the SFA funding rules which state:- Providers must have in place a strategy that sets out how they have identified and will deliver a balance of the objectives set out in New Challenges, New Chances.
- show evidence on how they will operate in strong local partnerships to ensure their objectives are underpinned by engagement and consultation with their communities, local authorities, local enterprise partnerships and other key local stakeholders.
- have clear outcomes and appropriate measures capable of evaluation by their community and local stakeholders.
- develop and implement a robust financial strategy that adds to their community learning allocation.
- abide by the funding eligibility (including learner eligibility) as set out in the SFA's funding rules. <https://www.gov.uk/government/publications/sfa-funding-rules-2015-to-2016>

4. Purpose of Community Learning

<https://www.gov.uk/government/collections/community-learning-government-funding>)

Community learning includes a range of community-based and outreach learning opportunities. These are primarily provided by local authorities and further education colleges (further education providers). Community learning is designed to help people of different ages and backgrounds:

- get a new skill
- reconnect with learning
- follow an interest
- prepare to progress to formal courses
- learn how to support their children better
- It supports wider government policies on localism, social justice, stronger families, digital inclusion and social mobility.

5. Purpose of the Adult Skills Budget

- To support flexible and responsive provision for learners aged 19+ without level 2 qualifications or without GCSE, English or Maths at grades A*to C
- Funding is focussed on qualifications that are part of a regulated framework approved by the Skills Funding Agency.
- Providers must operate within the terms and conditions of the funding agreement, the funding rules, the performance management rules and the individual learner specification. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/414797/Funding_Rules_v2_March_2015.pdf

6. Herefordshire Council's Priorities

The Adult and Community learning provision is lined to the visions and priorities of Herefordshire Council's corporate plan 2013-15.

Herefordshire Council's Vision

Herefordshire - a place where people, organisations and businesses work together within an outstanding natural environment, bringing about sustainable prosperity and wellbeing for all.

The main priorities which directly link to the Adult and Community Learning service are to:-

- enable residents to be independent and lead fulfilling life
- create and maintain a successful economy
- keep children and young people safe and give them a great start in life
- enable residents to live safe, healthy and independent lives.
- decrease the % of working age population with no qualifications
- increase the % of residents who volunteer
- increase the number of unpaid carers receiving support

The family learning programmes support the priorities of the Children and Young People's Partnership by:

- targeting resources and supporting vulnerable families
- improving the emotional and mental health and wellbeing of parents and carers
- supporting outcomes for children
- helping families, parents and carers to help themselves, particularly in the early years of their children's lives
- promoting health and well-being
- achieving success in life, learning and future employment

7. How the Herefordshire Adult and Community Learning Service is Funded

The service is predominately funded by the Skills Funding Agency; other funding is raised by learner's fees or external grants. Plus the service receives a great deal of £plus money, from the organisations it works in partnership with e.g. free room hire, support staff etc. The service for the first time in 2013-14 measured the amount of £plus generated this came to in total £67,815.98. This is in addition to the fees generated by learners of £17,270.71.

Table 1: SFA Budget Allocation and Actual Funding Delivery by Academic Years

	2013-14 Allocation	2013/2014 Actual	Learner / Learner Starters Enrolments	Cost per Learner	2014/2015 Allocation	2015/2016 Allocation
Community Learning	£340,972	£340,972	1058	£322	£340,972	£340,972
Adult Skills Budget	£233,941	£141,844.52 (-£92,096.48)	190	This is pre-set by the government against the individual learning aim	£199,751	£173,046 as at March 2015 Further reduction to £168,973 July 2015

2013/2014 was the first year of Adult Skills Budget funding for our service. Due to needing to capacity build the provider network and how the SFA funding model works there was a short fall of the funding drawn down in the first year against the allocation. We are currently on target to deliver and fully utilise the Community Learning allocation for 2014/2015 and we forecast to outturn the same as we did in 2013/2014 for the adult skills allocation for 2014-15. We have actions in place to increase the delivery for adult skills for 2015/2016 academic year see service action plan section and key priorities.

The funding for Community Learning from the SFA has been fixed for the last 10 years (which represents an actual decrease, when the cost of living is increasing) Therefore this reduces the learner numbers we are able to deliver to.

The SFA has reduced nationally for the second year running the non-apprenticeship (other) adult skills budget allocation. For 2015/2016 the reduction is 24% of the funding that we were allocated in 2014/2015. A further reduction after the national elections was implemented in July 2015.

The service contracts out most of its funding to a variety of providers within Herefordshire to deliver the learning and retains some funding to provide contract monitoring, quality assurance and management of the service.

8. Grants

In 2013-14, NIACE/Skills funding agency - Equality and Diversity innovation funding awarded Herefordshire Council a grant for £15,000 to support an outreach project for the Gypsy, Romany and Traveller (GRT) community; to encourage engagement and participation in all kinds of learning, from light touch family learning through to accredited education and training. The Adult and Community team provided £40,000.00 to deliver provision.

The project aimed to redress the balance in attainment levels by reintroducing learning in a supported way. To undertake research into the best means of engagement with the community and potential adult learners, disseminate this information and share examples of best practice.

The project attained the following outcomes against target:

- 57 accredited certificates awarded
- 31 non accredited certificates awarded
- target to engage a minimum of 35 members of the Traveller Community. 84 members were engaged.
- projected 20 participants to engage

- Achieved engagement of 47 participants (a number of learners completed more than one course)
- target to support the delivery of 10 courses - 22 courses were delivered
- produced a dissemination video to share information about the project and good practice

This project was run in partnership with the Equalities & GRT Team

The project was so successful that it has been continued after the NIACE/Skills Funding Agency grant.

9. Fee Policy 2015-2016 (see appendix B)

A consistent Fees Policy is required to ensure that adults within Herefordshire are treated equitably by each delivery partner within the Adult and Community Learning Provider Network. The fee Policy for 2015/16 is attached at **Appendix B** and remains unchanged from 2014/2015.

10. Promotion of Adult and Community Learning

The service has supported the development of the LearnHerefordshire Website, www.learnherefordshire.co.uk which is currently hosted by Marches Access Point (Map). It is currently being investigated how this could be continued and expanded.

11. Curriculum Areas

The adult and community learning team develop and commission curricula that respond to the need of learners. The curricula take into consideration the courses, times, locations and modes of delivery.

Particular curriculum focus for 2014/2015 and 2015/2016 is:

- delivery of English, Maths and ICT
- development of employability programmes
- responding to the needs of JCP clients
- development and delivery of targeted provision for Care leavers
- development of progression opportunities from non-accredited courses
- review and delivery of Family Learning activity working in partnership with Children Centre's and schools
- development of accredited programmes for independent living for learners with learning difficulties and or disabilities
- responding to the needs of Herefordshire Housing Job club clients

12. How the service is delivered

Herefordshire Council does not directly deliver any provision, The Council works in partnership and sub-contracts with a range of training providers however, the council remains responsible for quality and is inspected by Ofsted.

26 organisations successfully completed the Provider Framework application process and are now included in the framework. The providers within the Framework are invited to tender for delivery opportunities in the following areas:-

- Adult Skills Budget(ASB)- Entry 1,2,3, level 1 & level 2)
- English and Maths functional skills qualification –

- | | |
|--|---|
| ● Adult Skills Budget(ASB)- will increase employment opportunities | Employment Skills and ICT - Qualifications that |
| ● Community Learning | Learning for enjoyment – Fees policy applies. |
| ● Family Learning | Learning to help parents support their children better. |
| ● Skills for Independent living lives | Course to help learners live more independent lives |

Tender panels review each application and funding/outputs and contracts are awarded annually on an academic year basis.

Please see Appendix C for list of current providers.

Accommodation

The council has no learning centre of its own, and delivery is through community facilities. The accommodation costs for delivery of courses are paid through subcontracts for provision paid to delivery partners.

The Adult and Community Learning team are based in the Plough Lane council offices.

ICT Equipment

The service provides three sets of 12 laptops for outreach and a set of 10 iPads.

Staff ICT equipment is maintained by Herefordshire Council.

Data Management

The service has a contract with AQUA, a data management provider. The provider supports a web accessed database and reporting system which is maintained, supported and updated as a part of the contract. As the SFA data requirements have increased AQUA has become too labour intensive producing very limited reports. We are looking to replace the system in 2015/2016 academic year.

Equality

We seek to provide high quality learning opportunities that are inclusive and free from discrimination.

Equality of opportunity is an important aspect of raising aspirations, self-esteem and achievement. We aim to provide learning that is safe, accessible and welcoming. Discriminatory behaviour or harassment will not be tolerated.

The Equality Act which came into force in October 2010 talks about people with 'protected characteristics'. This law bans discrimination arising from a person's age, disability, gender, sexual orientation, gender re-assignment, religion or belief, race, pregnancy /maternity, marriage/civil partnership. These are the protected characteristics. As a contracted-out service we require all our providers to comply with the Equality Act 2010 and actively promote Equality and Diversity in the delivery of ACLS provision, as outlined in the Common Inspection Framework.

We support and develop our staff and provider tutors through equality and diversity mandatory training and through the tutor handbook. Equality and Diversity is also embedded within the Observation of Teaching and Learning process.

We monitor provider performance against targets, policies and procedures and act on any inequalities highlighted.

An Equalities Impact Assessment has been carried out.

Contract Management

Each provider is allocated a contract manager. The contract manager is the first point of contact for the provider, if they require any help or support. The contract manager is responsible for monitoring the contract and ensuring that the quality standards are being maintained.

They do this by:-

- attending learning sessions
- undertaking observation of teaching and learning
- organising provider staff training
- talking to learners/evaluating learner feedback
- gathering and evaluating tutors and provider feedback
- formal termly contract review meetings (including reviewing MIS data)

If a provider is deemed to be a risk of non-delivery or there are concerns about quality – monthly monitoring visits are arranged, until there is an improvement or the contract is withdrawn.

Annual contracts are awarded for Adult Skills Budget contracts and 3 year contracts for all Community Learning Contracts – on the condition that they can be amended / withdrawn depending on how they have performed.

Quality and Safeguarding

The Adult and Community Learning manager is responsible for ensuring that all learners achieve their best possible learning outcomes, stay safe, received the appropriate support, are treated fairly, learn in a safe environment and received the best advice and guidance to aid progression. The manager is also responsible for ensuring that all data is handled and stored in line with Herefordshire Council Information, security governance policies and procedures.

The Adult and Community Learning Manager leads the implementation of all aspects of quality improvement. The quality assurance cycle reflects the requirements of Ofsted, awarding bodies and Recognising and Recording Progress and Achievement (RARPA) for non-accredited learning. The following approaches are used to identify areas of good practice and areas for improvement:

Self-assessment report (SAR)– the annual self-assessment process starts in November and involves qualitative analysis of data, consultation with learners, tutors, partners, venues and other members of the Marches Peer Review group to arrive at judgments of the provision against Ofsted's Common Inspection Framework.

Self - Assessment Report 2013/2014 - this is the latest year that the SAR has been carried out the service assessed itself as good, with grade 2's in all areas and was moderated at the January 2015 Provider meeting.

The service's key strengths and areas for improvement were identified as:

Key Strengths

- Learners achieve extremely well across the service
- Extremely strong partnership work resulting in courses specifically developed to meet learners needs
- Learners develop good confidence communication and interpersonal skills to enable them to progress onto further courses within and outside the service; volunteering and employment
- Herefordshire Council's support of the voluntary sector and training providers to increase their capacity and capability to provide high quality education and training provision

Areas for improvement

- Learners do receive on course information and advice and are sign posted to formal IAG however need to develop relationship with Prospects new contract holder for National Careers Service locally.
- Attain Matrix accreditation
- Replace MIS system as current AQUA system is labour intensive producing limited electronic data reports. Making robust contract management impossible. Reports are produced manually at present which makes tracking difficult and monitoring of data inefficient.

Observation of teaching and learning (OTL) – every tutor is subject to an OTL and awarded a grade. An action plan is developed for any identified training needs and monitored to ensure to ensure compliance.

Learner and tutor evaluations – at the end of each course – learners and tutors actively encouraged to complete an evaluation form. The information gathered from these forms is recorded and where necessary the appropriate action is taken. The results from these evaluations are used in the SAR process.

Contractual reviews – where the provision is subcontracted out – a half termly quality review will be conducted to ensure that the standards required are being maintained and the learner targets met. Including tutor CPD monitoring.

Course monitoring – all courses are monitored by a member of the Adult and Community Learning team to check that they are being delivered according to contractual arrangements. It also gives the team member the opportunity to talk to learners.

Tutor training - Herefordshire Council provides mandatory training for tutors and has developed e-learning modules with HOOPLE. The provider contract states that the tutors must be and remain up-to-date with professional training. Mandatory provider & tutor training in Equality and diversity, Safeguarding, data protection, activity risk assessment and Information Advice and guidance

Termly provider meetings – are held to share good practice, update providers with SFA requirements, any changes to processes and systems, identify areas for improvement, dissemination of information, guest speakers, promoting partnership opportunities. Meetings are held at different training venues.

Peer support programme – Herefordshire Council leads on the Marches Peer Support Group. This has proved an excellent forum for sharing good practice and for developing standardisation with sub regional local authority adult learning services.

13. Partnership Working

A Herefordshire Community Learning Partnership was formed in 2014. The main purpose of the partnership is to develop a strategic approach to the shaping of the learning offer across Herefordshire and to ensure we use Adult and Community Learning funding effectively in order to have the greatest impact. Through the Partnership, we aim to develop a joint funding strategy, reduce areas of duplication and improve mechanisms to ensure that communities are able to shape and deliver elements of the learning offer. This will continue to be a major focus for the work of the ACL team manager in 2013/2014 and 2014/2015.

Membership consists of the two partners receiving Skills Funding Agency Community Learning funding (Herefordshire Council and Herefordshire and Ludlow College), JobCentre Plus, Voluntary Sector, Health, Learning Disability, Leisure and Housing.

14. Delivery and Outcomes 2013/14

Adult and Community Learning operates within academic years. The 2013/14 year is the most recent full set of data.

Number of courses, learners & enrolments split between community learning / adult skills budget academic year 2013-14

Funding Stream	Number of courses	Number of learners	New to learning	Number of enrolments
Community Learning	287	1058	660	2000
Adult Skills Budget (ASB) Accredited	40	190	140	257

2013/2014 was the first year Herefordshire Council was given an adult skills budget.

The core recruitment and delivery areas are Hereford City, Leominster, Kington, Ross-on-Wye and Bromyard.

For the whole service delivery in 2013/2014 academic year

58.7% of enrolments were from female learners

5.1% are from ethnic minority groups.

53.38% of enrolments were from learners with a learning difficulty and or disability

Completion and achievement rates split community learning & adult skills academic year 2013-14

Community Learning 2013/2014

	Learner no.	Learner starts (enrolments) Learners start	Withdrawn	Retention	Achieved	Success Rate	Benchmark
Community Learning	1058	2000	88 (4.4%)	914 (95.4%)	1892	99.5%	91.4%

Adult Skills 2013/2014 first year of delivery for ACL no trend data

Qualification Type	Leavers	Achieved	Success rate
Type A qualifications Level 1	56	49	87.5%
Type A qualifications Level 2	9	9	100%
Type B qualification Award	27	23	85.2%
Type B qualification functional skills level 1	65	47	72.3%
Type B qualification functional skills level 2	16	11	68.8%
QCF unit level 1	1	1	100%
Total	174	140	80.45%

Both the retention and success rates for Community Learning have remained high in 2013/2014 and are both above the national benchmarks. Delivery of Adult Skills was new for the service in 2013/2014.

The success rate of 80.45% for adult skills is above the Skills Funding Agency minimum level of performance.

Please see Appendix D for further Community Learning data for 2013/2014 and Appendix E for Adult Skills data for 2013/2014

Learner Satisfaction – out of 888 learner evaluations 92% of learners enjoyed their course in 2013/2014, 100% felt safe and welcomed, 99% learned new things.

Provider	No of Learner Evaluations	Has the Course Helped you					
		Learn	Qualification	Job	Friends	Confident	Healthier
	888	792	74	36	557	628	246
	% based on evals received	89%	8%	4%	63%	71%	28%

Impact of learning - Learner Feedback

We contacted 893 learners (who had agreed to be contacted) directly by post at the start of November 2014, to see how they had used their new skills since leaving the course in 2013/2014 academic year.

275 learner responses have been received. (30.79% return) as follows:

Questions asked:-	yes	%	no	%
increase my personal knowledge & Skills	244	88.7%	7	0.25%
help my family, friends and/or neighbours	129	46.9%	50	18.1%
become more active within my local community	107	38.9%	71	25.8%
improve my physical and/or mental health	153	55.6%	40	14.5%
increase my confidence	216	78.5%	19	0.6%
progress onto another course/s	131	47.6%	76	27.6%
become a volunteer	45	16.3%	106	38.5%
Did tutor give you info on future/follow on courses?	198	72%	58	2.1%
change job	17	0.6%	91	33%
Did you access formal IAG?	10	0.3%		

find paid work	Full Time	7	Part time	43
Would like to take part in Learner Forum/s?	91		33%	

Service Delivery Targets

Community Learning Delivery Targets

Delivery targets 2013/2014 academic year to 2017- 2018 academic year across whole service – This is based on current income projections and is subject to delivery and changes to national policy and funding.

Year	Number of courses	Number of learners	Number of enrolments
2013-14	290	1120	2000
2014-15	288	1100	1970

2015-16	286	1080	1950
2016-17	284	1060	1920
2017-18	282	1040	1900

Adult Skills Budget – Accredited courses. Delivery Targets

Accredited/non accredited	Number of courses	Number of learners	Achieved accreditation	Success
2013-14 ASB	35	175	85%	90%
2014-15 ASB	30	150	86%	91%
2015-16 ASB	29	145	87%	92%

Success Rates Targets – these may change if the service requirements change

	2013-14	2014-15	2015-16
Completion	89.5%	90%	91%
Achievement	90%	91%	92%
Success	99%	99.1%	99.2%
withdrawn	5%	4.9%	4.8%
Male/ Female	35% male 65% female	36% male 64% female	37% male 63% female
Non white British	7%	7%	7%
Learners with no qualifications	40%	41%	42%
Unemployed learners	45%	45%	45%
Retired learners	25%	25%	25%
LLDU learners	45%	45%	45%

DRAFT

Service action plan 2015/16

Action	Detail	Timescale	Owner	Outcome	Review date
Review and Revise provider frame work.	Review the current 3 year provider frame work and revise for implementation in 2016. A new 3 year framework will need to be developed for 2016-2019	Jan – June 2016	SC/AL	Provider framework in place – 2016 organisations successfully complete the process and issued contracts.	February, April, June 2016.
Provider contracts awarded	Community Learning – information to go out to providers for delivery proposals for 2015/2016 academic year. – June 2015 Adult skills – tender to go out to providers on the framework – June 2015 Adult skills contract award panel July 2015.	June 2015 – September 2015	SC	Community learning and adult skills information and tenders issued to providers on the framework June 2015. Contracts awarded and in place August/September 2015	July and August 2015
Adult Skills Budget.	Work with providers and partners to develop the adult skills offer. New provision being developed with ECHO Herefordshire Housing Headway HVOSS Roll out and expand provision from September 2015.	May – July 2015	SC/CB/AL	Development work started May 2015. Adult skills offer increased – numbers of learners and breadth of curriculum offer.	July 2015 review development of curriculum. First review November 2015
Implement revised	Revised policy for 2015/2016	June 2015	SC	Policy in place for	March 2016

fees policy				September 2015. Providers briefed and fees policy implemented. Process to ensure fees separately accounted for	
Provider contracts	Review and amend contract template in line with current SFA guidelines. Send to legal to check Issue Contracts.	July 15- August 15	SC/AL	Contracts agreed by August 2015.	July and August 2015.
£plus	Monitor the true value of £ plus. Produce £plus – accounts for 2014/2015	August 2015	AL/SC	Course proposal now included £ plus information. AL to record £ plus information.	Annual due August 2015/2016 and 2017
Localities	Further develop the services approach to delivering the provision through a locality approach Kington –health and well- being centre Tudorville – summer project	June 2015 July – Sept 2015	CB/SC	Community Learning Craft course being piloted in July 2015 in Kington. Engagement courses planned for summer 2015.	
Supporting delivery partners including the Voluntary and Community sector	Termly provider meetings to share good practice promote partnership working and keep providers abreast with the ever changing SFA requirements. Guest speakers invite to meetings to update providers in Specific areas. Tutors to be trained to deliver Adult Skills in line with SFA and OfSTED requirements.	Termly Autumn 2015	SC/CB	Skilled workforce to deliver high quality adult learning provision.	September/November 2015 January/March /June 2016

	<p>Develop new mandatory training programme for delivery from Autumn 2015.</p> <p>Support the development of a community training provider's website for sharing of good practice. Reliant on the purchase of new MIS system.</p> <p>Enable voluntary and community sector delivery partners and organisations to become more self-sufficient in quality and to enable them to be potential providers to organisations other than Herefordshire council.</p>	Spring 2016		Website developed as part of the new MIS system	2 months after MIS system installed
Quality	<p>Maintain and improve quality in-line with Skills funding Agency and Ofsted requirements.</p> <p>Ensure we are on target to achieve an OfSTED outcome of grade 2 as outlined in our Self- Assessment Report (SAR), Quality Improvement plan (QIP) and Adult Learning Plan</p>	Monthly from August 2015 – July 2016	SC/CB/DC	<p>Learner Achievement is above national benchmarks.</p> <p>Learner Satisfaction rates are over 90%</p> <p>Tutor's observation of teaching and learning grades are at least good (2).</p>	Monthly team meetings and quarterly provider meetings.
Community Learning Partnership	<p>Continue to develop the Community Learning Partnership with Herefordshire and Ludlow College.</p> <p>In particular to develop further opportunities for those people with mild to moderate mental health issues including impact measures.</p>	Termly September 2015 – July 2016	SC/AHe	<p>Community Learning Partnership in place.</p> <p>Learning opportunities in place for this priority group</p>	Termly meetings.
Matrix accreditation (IAG)	Obtain Matrix accreditation in line with Skills Funding Agency requirements.	June 2016	SC/AHe/CB/D C	Model of matrix service identified.	July/October/December 2015

	<p>CB attended introduction session. Consultant employed for specific advise</p> <p>To ensure learners have access to high quality information advice and guidance, sign-posting to the National Careers Service Mandatory IAG tutor training programme has been implemented</p>	June 2016	CB	<p>Matrix Standard Attained.</p> <p>100% of tutors teaching on provision have attended and achieved.</p>	
Family Learning	In addition to our planned activities for family learning programmes will be developed to directly contribute to the children centre's aims and objectives for supporting families in their areas.	June 2015 – July 2016	SC	<p>Increase in the number of parents/carers attending family learning provision through the children's centre.</p> <p>Increased use of data sharing to capture referrals, attendance, achievement and progression. This in turn will be used to inform planning and commissioning of services and provision.</p>	January /April/July 2016
Young People leaving Care aged 19 and over	Continue to develop learning opportunities to re-engage care leavers back into learning.	September 2015 – July 2016	SC/CB/DC		
Effective Management	Replace current MIS system in the academic year 2015/2016	September 2015 – March	AH/SC/AL	New MIS system in place that meets SFA	September/November 2015

Information system (MIS)	Business case proposal submitted February 2015 to the IT Board .	2016		contractual requirements and enables the Service to improve its reporting and in turn improve development of provision, tracking of learners and contract management.	January/March 2016
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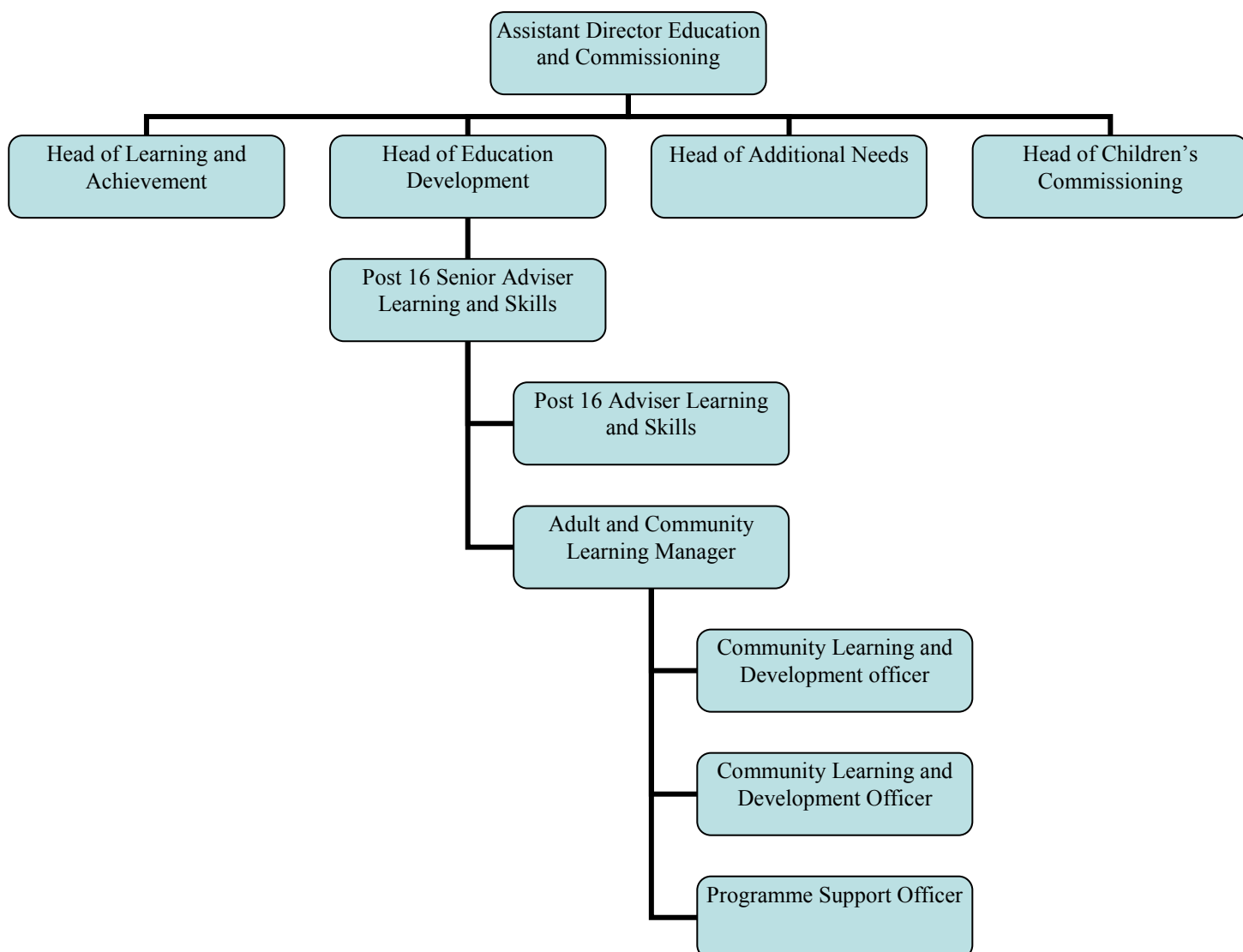
In addition and incorporating the above service action plan, a rolling Quality Improvement Action Plan is maintained and actioned, which identifies actions arising from the quality monitoring cycle to support and drive forward continuing improvement to the quality of the Council's provision.

References

- BIS (2011) New Challenges, New Chances FE and Skills System Reform Plan: Building a world class system
- SFA (2015) Funding Rules 2015/2016

Appendix A

Staff Structure:



Appendix B

Fees Policy:

HEREFORDSHIRE COUNCIL ADULT AND COMMUNITY LEARNING – FEES POLICY 2015-16

Herefordshire Council receives Community Learning (CL) and Adult Skills Budget (ASB) funding from the Skills Funding Agency (SFA) to support learning in Herefordshire.

Community Learning (CL) – where the learning is designed to help people gain a new skill, re-connect with learning, pursue an interest, prepare for progression to formal courses or learn how to support their children better. There is no requirement for CL learners to progress to other learning or achieve regulated qualifications.

Adult Skills Budget (ASB) – where courses lead to a qualification and/or accreditation.

All courses offered by Herefordshire Council's Adult and Community Learning Service are funded partially or totally by government funding allocated to the service via the Skills Funding Agency (SFA) and are therefore subject to SFA funding rules.

Purpose of Government Supported Community Learning (BIS – New Challenges, New Chances Dec 2011)

- Maximise access to community learning for adults, bringing new opportunities and improving lives, whatever people's circumstances.
- Promote social renewal by bringing local communities together to experience the joy of learning and the pride that comes with achievement.
- Maximise the impact of community learning on the social and economic well-being of individuals, families and communities.

Objectives:

- Focus public funding on people who are disadvantaged and least likely to participate, including in rural areas and people on low incomes with low skills
- Collect fee income from people who can afford to pay and use where possible to extend provision to those who cannot.
- Widen participation and transform people's destinies by supporting progression relevant to personal circumstances, e.g.
 - improved confidence and willingness to engage in learning or self-employment
 - improved digital, financial literacy and/or communication skills
 - parents/carers better equipped to support and encourage their children's learning
 - improved/maintain health and/or social well-being.
- Develop stronger communities, with more self-sufficient, connected and pro-active citizens, leading to:
 - increased volunteering, civic engagement and social integration
 - reduced costs on welfare, health and anti-social behaviour
 - increased online learning and self organised learning
 - the lives of our most troubled families being turned around.
 - develop skills for improving employability

Who is eligible to participate?

Most individuals who want to take part in learning will be eligible for funding if:-

- 1) they are a citizen of the United Kingdom and Islands, have Right of Abode (the right to live permanently in the United Kingdom without any immigration restrictions), or are a citizen of a country that is within the European Economic Area (EEA).
- 2) they have been ordinarily resident in the United Kingdom and Islands or the European Union (EU) or the European Economic Area (EEA); continuously for at least the previous three years on the first day of learning; and
- 3) the learning is taking place in England.

Other individuals could be eligible who do not meet the above list.

The above information has been taken from the Funding Rules 2015 – 2016 document as issued by the Skills Funding Agency

Fee policy and remissions

Community Learning (CL) courses

The cost of these courses has been set at £4.50 per learning hour however; learners in receipt of certain state benefits can enrol on these courses and pay £1.50 per learning hour.

Eligibility for discounted course fees will be subject to the learner providing proof of means tested benefits.

Refund Procedure

Learners should note that fees should be paid at the time of enrolment and are not normally refundable.

If a course is cancelled and no suitable alternative is available then a full refund will be given.

In the event of sickness, a full or partial refund will be given on production of a valid doctor's certificate, depending on the number of sessions attended. Applications for a refund should be made in writing and submitted to the provider for approval.

Non-Payment of Fees

Learners fees (where applicable) are collected at the time of enrolment. No learner can attend without having paid their fees.

Skills for Independent Living courses

These courses are free to the following key target groups, and are specifically aimed at increasing their independence:

- 🟢 Learners who are unemployed.
- 🟢 Learners with learning difficulties and/or disabilities, including mental health issues.

- Learners who are homeless, or in danger of becoming homeless, or living in sheltered accommodation.
- Learners aged 19 or over who are leaving care.
- Learners who are carers or family of people with learning difficulties and/or disabilities, including mental health issues.
- Learners yet to achieve a prior level of attainment at full level 2 or above (i.e. 5 GCSEs grade C or above).
- Learners with pre-entry level English and Maths skills (only as progression onto an accredited qualification)

Learners who are engaged within the troubled families programme, known as Families First³ in Herefordshire.

Furthermore, In 2015/16 the following two categories have been identified as key priorities:

- Learners who wish to improve their parenting skills (Wider Family Learning (WFL) learning aims only).
- Learners from areas identified as local areas of deprivation⁴, who are on low income (below £16,000) and/or in receipt of state benefits.

All delivery remains within the funding rules dictated by your existing contracts and the Skills Funding Agency Funding Rules 2015/16⁵.

These courses will be clearly identified on any promotional flyers or literature.

Adult Skills Budget (Qualifications/accredited courses)

Only learners aged 19+ on the 31 August 2015 can access the Adult Skills Budget courses (ASB)

Maths and English

Maths and English courses for adults are free of charge, and are ideal in helping to increase your confidence and skills.

You may take an English and/or Maths qualification up to Level 2 if you do not currently hold a GCSE grade C or above in the appropriate subject. If you attained a Maths and/or English qualification but can no longer use these skills you will also be eligible to attend these courses

Employment Skills

Would you like to learn new skills which may improve your chances of finding employment?

If you are currently unemployed and in receipt of Job Seekers Allowance (JSA), Employment Support Allowance -work related activity group (ESA WRAG), Universal Credit, or in receipt of any other state benefit, and wish to study a course aimed at improving your employment skills, you can study for free (subject to producing evidence of your benefit).

If you are currently in paid employment you may still be eligible to attend these courses. To see if you qualify please contact *To be agreed*.

For details of available courses please visit www.learnherefordshire.co.uk

³ [Families First in Herefordshire](#)

⁴ [Deprivation in Herefordshire](#)

⁵ [SFA Funding Rules 2015/16](#)

Appendix C

Provider Contract details and courses delivered by area, venue and provider 2013/2014 academic year:

Provider	CL Value	ASB Value
Ant's Help Ltd	18,200.00	0.00
Aspire Living Ltd	8,400.00	0.00
Brightstripe	10,360.00	3,270.00
Business Angel (Hereford) Ltd	13,384.00	0.00
Deaf Direct	9,100.00	0.00
ECHO	19,117.00	0.00
Herefordshire & Ludlow College	27,000.00	0.00
Herefordshire Headway	18,900.00	0.00
Hoople	0.00	0.00
HVOSS	0.00	18,825.00
Kemble SHYPP	25,662.00	6,975.00
Marches Access Point	13,300.00	23,240.00
Nationwide Community Learning Partnership	0.00	18,390.00
Project Link Services CIC	10,500.00	0.00
Red Spark Learning CIC	19,950.00	37,029.00
The Cart Shed CIC	32,284.00	6,840.00
The Hereford Academy	28,000.00	9,675.00
The HOPE Centre	21,980.00	0.00
The Houghton Project	12,600.00	0.00
	288,737.00	124,244.00

Appendix D

2013-2014 Community Learning (CL)

1058 learners (of which 660 were new to learning)

2002 enrolments

The following comparison is based on the data returns of 41 contracted recipients of Skills Funding Agency Community Learning (CL) funding.	Herefordshire	National Average (%)	Herefordshire's Rank
Retention & Success -			
Retention rate	1914 (95.5%)	95.5%	19
Success Rate	(99.0%)	92.9	3
Male Learners			
Male Enrolments	938 (42.2%)	27.6	2
Unemployed			
Unemployed Enrolments	1229 (80.2%)	31.3	3
Learners with Learning Difficulty and/or Disability (LLDD)			
LLDD Enrolments	1120 (55.8%)	22.5	1
Black and Ethnic Minority (BEM) - All			
BEM – All Enrolments	118 (3.9%)	14.5	32

Appendix D

HEREFORDSHIRE COUNCIL'S Adult and Community Learning – Adult Skills Budget Data 2013-14 DATA REPORT 2013-14

Funding Stream	Number of courses	Number of learners	New to learning	Number of enrolments
Adult Skills Budget (ASB) Accredited	40	190	140	257

Adult Skills Budget – Qualifications 2013-14

Qualification name and level	Awarding Body	No. of learners entered for the exam	No. of Learners Achieved qualification	Success rate	SFA Threshold%
Functional Skills English Entry 1 5008835X	NOCN	2	2	100%	63%
Functional Skills English Entry 2 50093344	NOCN	4	3	75%	63%
Functional Skills English Entry 3 50093204	NOCN	6	3	50%	63%
Functional Skills English Level 1 50084999	NOCN	16	12	75%	63%
Functional Skills English Level 2 50094695	NOCN	6	5	83.3%	63%
Delivered by Business Angels, Red Spark Learning and Herefordshire and Ludlow College					
Functional Skills English Entry 2 50090860	OCR	5	5	100%	63%
Functional Skills English Entry 3 50091979	OCR	9	9	100%	63%
Functional Skills English Level 1 5Delivered	OCR	1	1	100%	63%
Delivered by Marches Access point					
Total number of Functional Skills English qualifications achieved.		49	40	81.63%	63%

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Fee policy and remissions

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- Learners with learning difficulties and/or disabilities, including mental health issues.
- Learners who are homeless, or in danger of becoming homeless, or living in sheltered accommodation.
- Learners aged 19 or over who are leaving care.
- Learners who are carers or family of people with learning difficulties and/or disabilities, including mental health issues.
- Learners yet to achieve a prior level of attainment at full level 2 or above (i.e. 5 GCSEs grade C or above).
- Learners with pre-entry level English and Maths skills (only as progression onto an accredited qualification)

- Learners who are engaged within the troubled families programme, known as Families First¹ in Herefordshire.

Furthermore, In 2015/16 the following two categories have been identified as key priorities:

- Learners who wish to improve their parenting skills (Wider Family Learning (WFL) learning aims only).
- Learners from areas identified as local areas of deprivation², who are on low income (below £16,000) and/or in receipt of state benefits.

All delivery remains within the funding rules dictated by your existing contracts and the Skills Funding Agency Funding Rules 2015/16³.

These courses will be clearly identified on any promotional flyers or literature.

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Only learners aged 19+ on the 31 August 2015 can access the Adult Skills Budget courses (ASB)

Maths and English

Maths and English courses for adults are free of charge, and are ideal in helping to increase your confidence and skills.

You may take an English and/or Maths qualification up to Level 2 if you do not currently hold a GCSE grade C or above in the appropriate subject. If you attained a Maths and/or English qualification but can no longer use these skills you will also be eligible to attend these courses

Employment Skills

Would you like to learn new skills which may improve your chances of finding employment?

If you are currently unemployed and in receipt of Job Seekers Allowance (JSA), Employment Support Allowance -work related activity group (ESA WRAG), Universal Credit, or in receipt of any other state benefit, and wish to study a course aimed at improving your employment skills, you can study for free (subject to producing evidence of your benefit).

If you are currently in paid employment you may still be eligible to attend these courses. To see if you qualify please contact *To be agreed*.

For details of available courses please visit www.learnherefordshire.co.uk

¹ [Families First in Herefordshire](#)

² [Deprivation in Herefordshire](#)

³ [SFA Funding Rules 2015/16](#)

Equality Analysis (EIA) Form

A) Description

Name of service, function, policy (or other) being assessed

Adult and Community Learning

Directorate or organisation responsible (and service, if it is a policy)

Children's Wellbeing

Date of assessment

19th June 2015

Names and job titles of people carrying out the assessment

Sue Cobourne – Adult and Community Learning Manager

Accountable person

Sue Cobourne

What are the aims or main purpose of the service, function or policy? What does it provide and how does it provide it?

Herefordshire Council provides Adult and Community Learning through the Herefordshire Council's Adult and Community Learning Service. The service consists of a small team that sits within the Post 16 Learning and Skills team in the Education and Commissioning Directorate, Children's Wellbeing. The adult and community learning team are fully funded through the SFA contract and are therefore dependent on the successful delivery of provision.

We commission and contract out which means we do not employ our own tutors; we work with partners to deliver adult learning opportunities and the priorities that we set; encourage social, economic, educational and personal progression for individuals and families.

We work with delivery partners to ensure adult education courses are available for local residents within priority areas. Delivery partners include voluntary and community organisations, FE colleges, private training providers, schools, children's centres and libraries. To deliver non- accredited, entry and level one and two provision.

Location or any other relevant information

The team is based in Plough Lane. The service is delivered in training/community venues across Herefordshire.

List any key policies or procedures to be reviewed as part of this assessment.

Equality and Diversity policy
E& D MIS data
Observation of Teaching and Learning
Course monitoring

Who is intended to benefit from the service, function or policy?

To engage with local people who are least likely to participate in learning and enable them to access a range of high quality learning opportunities. So that they can lead more independent lives, support their families, gain a qualification, get a job, volunteer and become less socially isolated.

To Widen adult participation in learning through a targeted approach, promoting equality and diversity and improving access to learning for particular under-represented groups and those who have not been engaged in learning for a significant period of time. In particular the service work with those people who are:

- unemployed.
- people with a learning difficulties and/or disabilities, including mental health issues.
- homeless, or in danger of becoming homeless, or living in sheltered accommodation.
- carers of people with learning difficulties and/or disabilities, including mental health issues.
- care leavers
- yet to achieve a prior level of attainment at full level 2 qualification.
- yet to achieve level 2 in English and Maths
- engaged within the troubled families programme (Families First¹)
- wishing to improve their parenting skills.
- from areas identified as local areas of deprivation²
- on low income (below £16,000) and/or in receipt of state benefits

Who are the stakeholders? What is their interest?

Job Centre plus – referring unemployed clients for up skilling

HVOSS – referring Talent match clients & volunteers

The libraries – delivering training in their venues

Voluntary and Community organisations that support people with specific needs – we offer courses in their premises and some are delivery partners.

Children leaving care – we run specific courses to meet their needs

Childrens centres – we offer a family learning programme.

Herefordshire housing – courses run to meet their Job club clients.

B) Partnerships and Procurement

If you contract out services or work in partnership with other organisations, Herefordshire Council remains responsible for ensuring that the quality of provision/delivery meets the requirements of the Equality Act 2010, ie.

- Eliminates unlawful discrimination, harassment and victimisation
- Advances equality of opportunity between different groups
- Fosters good relations between different groups

What information do you give to the partner/contractor in order to ensure that they meet the requirements of the Act? What information do you monitor from the partner/contractor in order to ensure that they meet the requirements of the Act?

¹ [Families First in Herefordshire](#)

² [Deprivation in Herefordshire](#)

100% of tutors must attend the mandatory E&D training – every three years.
 E&D is one of the key elements of Observation of Teaching and Learning quality process.
 E&D data is collected and analysed termly with each provider.
 E&D is reviewed annually within our self-assessment process.
 Providers E&D policies are a contractual requirement.
 Grade 2 – in E&D at last Ofsted Inspection

Are there any concerns at this stage that indicate the possibility of inequalities/negative impacts? For example: complaints, comments, research, and outcomes of a scrutiny review. Please describe:

None

C) Information

What information (monitoring or consultation data) have you got and what is it telling you?

E& D Information is collected upon recruitment.
 Learner end of course evaluation forms,
 Data is collected regarding completion and achievement

For the whole service delivery in 2013/2014 academic year
 58.7% of enrolments were from female learners
 5.1% are from ethnic minority group – although slightly below the demographic profile the service is targeting and delivering to the unemployed population cohort. We do not have an ethnicity profile for claimants but anecdotally it is very low.
 53.38% of enrolments were from learners with a learning difficulty and or disability

The data for 2013-14 shows that learners from different groups are achieving equally.

D) Assessment/Analysis

Describe your key findings (eg. negative, positive or neutral impacts - actual or potential). Also your assessment of risk.

Strand/community	Impact
Community – Learners are achieving equally across the provision regardless of their Age, race, sexual orientation, belief, disability	Increased number of residents with level 2 English and maths qualifications. Increased ICT skills to enable residents to use computers to access on-line services Communicate with friends and families – which in turn reduces social isolation. Increase employability opportunities

E) Consultation

Did you carry out any consultation? No

Who was consulted?

n/a

Describe other research, studies or information used to assist with the assessment and your key findings.

n/a

Do you use diversity monitoring categories? Yes
(if No you should use this as an action as we are required by law to monitor diversity categories)

If yes, which categories?

- yes Age
 yes Disability
 yes Gender Reassignment
 no Marriage & Civil Partnership
 no Pregnancy & Maternity
 yes Race
 no Religion & Belief
 no Sex
 no Sexual Orientation

What do you do with the diversity monitoring data you gather? Is this information published? And if so, where?

We use it to check that learners regardless of their diversity are achieving equally. The information is included in our Self-assessment report.

F) Conclusions

	Action/objective/target OR justification	Resources required	Timescale	I/R/S/J
a)	Review E&D policy	E&D policy	July 2015	
b)				
c)				

d)

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(I) *Taking immediate effect.*

(R) *Recommended to Council/Directors through a Committee or other Report*.*

(S) *Added to the Service Plan.*

(J) *To be brought to the attention of the Equality Manager.*

*Summarise your findings in the report. Make the full assessment available for further information.

NB: Make sure your final document is suitable for publishing in the public domain.



DECISION MAKER:	Cabinet
DECISION DATE:	15 October 2015
TITLE OF REPORT:	PLANNED CAPITAL PROGRAMME FOR SCHOOLS 2015/16
REPORT BY:	SUFFICIENCY, PLANNING & CAPITAL INVESTMENT MANAGER

Classification

Open

Key Decision

This is a Key Decision because it is likely to result in the Council incurring expenditure which is, or the making of savings which are, significant having regard to the Council's budget for the service or function to which the decision relates.

NOTICE has been served in accordance with Part 3, Section 9 (Publicity in connection with key decisions) of The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012

Wards Affected

County-wide

Purpose

To approve the proposed expenditure of capital grants for school building and maintenance work allocated to the council for the year 2015/16

Recommendation(s)

- a) that £1.9m of school building improvements and maintenance works, be approved; and
- b) adjustments to the programme of works and budget allocation based on detailed quotations are delegated to the Head of Education Development.

Alternative Options

- 1 That the maintenance grants supporting building work in schools are profiled differently or spent on different schemes.
- 2 The schemes have been determined from the latest condition survey reports for each school and information returned by schools in their 'duties associated with running a school' document. It has also been considered by the council's property services section, the capital strategy consultative group, involving head teachers and the

Further information on the subject of this report is available from
Karen Knight - Sufficiency, Planning & Capital Investment Manager on Tel (01432) 383042

LCVAP (local authority co-ordinated voluntary aided programme) group, involving diocesan and arch-diocesan representatives. The proposed works are addressing known priorities.

Reasons for Recommendations

- 3 Local authorities receive three separate funding streams from government for capital works: maintenance, basic need and LCVAP. Maintenance grants can only be spent on local authority maintained and voluntary controlled schools; LCVAP can only be applied to voluntary aided schools; and basic need grant is accessible by all schools. There is an open and transparent approach to the amounts of funding received and its expenditure, which this report provides. Academy and free schools have access to the education funding agencies condition improvement fund for building works, both maintenance and improvements.
- 4 There is a backlog of urgent and essential maintenance works at local authority maintained, voluntary controlled and voluntary aided schools. Based on the best information available these have been prioritised for action within available resources.
- 5 The schools capital investment strategy, due to be presented to council in December 2015 will inform where it is most appropriate to spend future grants.

Key Considerations

- 6 The council was informed of the grant allocation within this financial year and has worked through the prioritisation of schemes with the schools consultative group and the Diocese of Hereford.
- 7 There are a variety of funding streams to support capital works at schools. The national schools funding formula means all schools receive a relatively small devolved capital allocation to support minor maintenance or improvement works. Schools may convert revenue budgets to capital to assist with these works. Bigger maintenance schemes like the replacement of a roof, a new heating system or windows are funded through a central maintenance grant awarded to the council or via the academy/free school condition improvement fund. Denominational schools are given a separate LCVAP grant to support these larger schemes.
- 8 The council's wider duties and responsibilities associated with the wellbeing of children and the oversight of its estate are such that it maintains assurances that schools are undertaking their maintenance duties. The council annually asks governors of all schools to complete a document entitled 'duties associated with running a school'. The document sets out necessary health and safety checks and other maintenance work that should be routinely undertaken.
- 9 The planned maintenance 2015/16 is the known essential work that needs to be undertaken. An outline of scope and the forecast cost is set out below:

- 10 The proposed expenditure profile is:

Maintenance Expenditure 2015/16		
	£k	
LA Planned Maintenance	497	See school detail in appendix a
Maintenance Fees	50	
Safeguarding Work including Fees	200	
Contingency Emergency Works	94	
Condition Reports	20	
DDA Adaptations	150	
Broadlands / Aylestone Scheme	120	Maintenance avoidance contribution to scheme
Contribution to Colwall	84	
Total	1.215	
Government grant to LA school	1.215	
LCVAP Expenditure 2015/16		
LCVAP Planned Maintenance Works 2015/16	645	See school detail in appendix b
Works Carried Forward from 2014/15	20	
Sub Total	665	
LCVAP Grant 2015/16 (100% figure)	665	

- 11 The expenditure per school is set out in appendices a and b. The fees required for this work are estimated to average 10%. These works can stretch over more than one financial year and capital funding is used across a number of years to support such schemes. The Department for Education informs the council of its allocation at different times in the year.
- 12 The council is constantly reviewing the safeguarding arrangements at all its schools to ensure they meet current expectations. In 2013/14 the council was expected to rectify fencing that was considered a potential safeguarding risk. Since then, each year an allocation has been set aside to address any unplanned safeguarding issues that arise during the year.
- 13 It is not always possible to foresee all schemes that need to be undertaken in any one year. An element of funding therefore is set aside to cover such events that cannot wait to be included in a future years funding.
- 14 In order to ensure the works at schools are properly targeted it is important that accurate and up to date condition surveys are undertaken All schools, excluding academies and free schools are therefore included in a five year rolling programme of condition surveys.
- 15 The council has a duty to ensure that any child with special needs attending a mainstream school can be reasonably accommodated. This may result in a requirement for provide additional facilities either in terms of equipment or buildings. An element of funding, has been set aside to meet this duty.
- 16 There are proposals to support the newly federated Aylestone Business and Enterprise College and Broadlands primary schools. As part of the funding package for the scheme an additional funding allowance from 2015/16 has been made in accordance with cabinet and council decisions.

- 17 There was a unique situation at Colwall CE primary with water ingress. It was agreed that the school would decant into temporary buildings. A significant portion of the council maintenance grant needed to be allocated to support the temporary relocation.

Community Impact

- 18 Schools are a key part of communities and as such it is important they are well maintained.

Equality and Human Rights

- 19 The proposed schemes have given due consideration to equality issues particularly in relation to disability. The council maintains a disability access scheme and carries out works to support this.

Financial Implications

- 20 The £1.9m of expenditure in the report will be funded by a maintenance grant of £1.2m and a £0.7m local authority co-ordinated voluntary aided grant from government.

Legal Implications

- 21 Herefordshire council has a duty to provide and support places of education that are both fit for purpose and health and safety compliant. The proposals set out in this report support the council in meeting these legal duties.
- 22 Failure to make repairs to known defects, such as those set out in this report, increases the risk to the council of litigation from matters arising from these defects.

Risk Management

- 23 Without undertaking the maintenance programme more children will be attending schools with defects including those that are considered significant health and safety concerns. This programme will address the highest known risks within the funding available.
- 24 The council needs to gain a more comprehensive understanding of the condition of its schools to mitigate the need for emergency maintenance work. This is being addressed through the creation of a schools capital investment strategy and monitoring of schools completion of their 'duties associated with running a school' document.
- 25 The risk is that final scheme costs could be significantly above or below the forecast. All schemes will be monitored by the capital strategy consultative group and a capital project board with officers from education, commissioning and property services. The board will meet monthly to review schemes. Any required adjustments to the programme and budget allocation will be agreed through the contract governance arrangements with the decision delegated to the Head of Education Development, to approve the amendments while remaining within the overall forecast.

Consultees

- 26 A LCVAP group with diocesan and arch-diocesan representation meet at least termly and have considered the prioritisation of schemes. The capital strategy consultative group, with a number of head teachers, diocesan representation and property services officers meet at least termly and have agreed the outline proposals as a constructive way forward for use of the grants.

Appendices

Appendix A – 2015/16 Individual School Projects - LA Planned Maintenance

Appendix B - 2015/16 Individual School Projects - LCVAP Planned Maintenance Works
2015/16

Background Papers

- None identified.

Appendix A

2015/16 Individual School Projects – Maintenance budget forecast 2015/16

DFE	School	School Type	Date of condition survey	Proposed Scheme 2015/2016	Maintenance budget forecast 2015/2016 £000s
2138	Ashfield Park Primary School	Community	19/09/2014	Fire alarm and emergency lighting; Fire doors	40
3006	Bosbury CE Primary School	Voluntary Controlled	30/01/2014	Fire doors	3
2011	Bredenbury Primary School	Community	19/09/2014	Damp-proofing	45
3010	Burley Gate CE Primary School	Voluntary Controlled	30/06/2014	Asbestos boarding removal; Ceiling and lighting works	40
2031	Clifford Primary School	Community	13/01/2014	Window refurbishment	13
3035	Eardisley CE Primary School	Voluntary Controlled	11/12/2012	Windows; Boiler and pump renewal	13
2046	Ewyas Harold Primary School	Community	30/06/2014	Fire precaution work including doors	7
2098	Ledbury Primary School	Community	30/06/2014	Boilers	30
3079	Much Birch CE Primary School	Voluntary Controlled	14/01/2014	WC cubicle replacement; Sanitary fitting replacement	40
3083	Orleton CE Primary School	Voluntary Controlled	19/09/2014	Emergency lighting	5
2152	St Weonard's Primary School	Community	07/11/2011	Fire precaution; Roof	38
2024	St. Peter's Primary School	Community	24/11/2011	Fire doors	7
7004	Blackmarston	Community	08/07/2014	Ventilation; Shading, gully, radiator change and air handling control	150
7007	Westfield School, Leominster	Community	16/06/2014	Retaining wall	65
Total					496.8

Appendix B

2015/16 Individual School Projects - LCVAP budget forecast 2015/2016

DFE	School	School Type	Date of condition survey	Proposed Scheme 2015/2016	LCVAP budget forecast 2015/2016 £000s
3305	Brampton Abbots CE Primary School	Voluntary Aided	23/01/2012	Skylights	26
3307	Bridstow CE Primary School	Voluntary Aided	24/01/2012	Wall rendering; Skylights; Fencing	26
3349	Ivington CE Primary School	Voluntary Aided	19/12/2012	Oil tank replacement; Fire alarm	30
3348	Leintwardine Endowed Primary School	Voluntary Aided	17/11/2011	Roof work	40
3330	Our Lady's RC Primary School	Voluntary Aided	24/11/2012	Windows; Porch	52
3366	Pembridge CE Primary School	Voluntary Aided	10/11/2011	Retaining wall	15
3367	Pencombe CE Primary School	Voluntary Aided	13/12/2012	Mobile replacement; Safeguarding arrangements	56
3331	St Francis Xavier's RC Primary School	Voluntary Aided	12/11/2012	Fire doors; Electrical services; Water tank replacement	15
3332	St James' CE Primary School (Hereford)	Voluntary Aided	01/05/2012	Roof work; Fencing	33
3372	St Joseph's RC Primary School	Voluntary Aided	30/06/2014	Windows; Fire alarm	43
3325	St Mary's CE Primary School (Fownhope)	Voluntary Aided	01/01/2013	Fire precaution works	30
3304	St. Michaels CE Primary School	Voluntary Aided	04/08/2011	Roofing	17
3384	Weston-under-Penyard CE Primary School	Voluntary Aided	23/01/2012	Windows and decking	32
3385	Whitchurch CE Primary School	Voluntary Aided	30/06/2014	Guttering	20
4600	Bishop of Hereford's Bluecoat School	Voluntary Aided	15/02/2012	Heating	100
4601	St Mary's R C High School	Voluntary Aided	31/02/2013	Fire doors and heating	110
Total					645



MEETING:	Cabinet
MEETING DATE:	15 October 2015
TITLE OF REPORT:	Future delivery arrangements for West Mercia Youth Offending Service (WMYOS)
REPORT BY:	Director for children's wellbeing

Classification

Open

Key Decision

This is not a key decision

Wards Affected

Countywide

Purpose

To secure approval for proposed new delivery arrangements for West Mercia Youth Offending Service (WMYOS).

Recommendation(s)

THAT:

- (a) **the Office of the West Mercia Police and Crime Commissioner acts as the host organisation for West Mercia Youth Offending Service from April 2016.**

Alternative Options

1. The proposed arrangement is the outcome of a comprehensive options appraisal undertaken by the WMYOS management board during 2014/15. This included detailed consideration of a broad range of alternative delivery models. These included:
 - **Outsourcing delivery to a third sector organisation.** This was discounted following a comprehensive market engagement exercise which identified a limited range of suitably experienced potential providers;
 - **Establishing a Local Authority Trading Company (LATC) for WMYOS delivery.** A full business case was undertaken for a LATC. Concerns around financial viability and the lack of engagement of all WMYOS partners led to this option being discounted;
 - **Hosting by a Local Authority.** After careful consideration this option was not considered viable for reasons specific to the four individual local authorities. It was also felt that this was the option least likely to achieve the desired outcomes for longer-term WMYOS delivery.

2. Each of these alternative options was assessed using clear and transparent criteria agreed by the WMYOS management board. This included consideration of financial viability, performance impact, quality and sustainability. The options appraisal forms a strong evidence base for the proposed hosting arrangement by the Office of the Police and Crime Commissioner which is supported in-principle by all WMYOS partners.

Reasons for Recommendations

3. West Mercia Youth Offending Service (WMYOS) is a partnership between four local authorities (Worcestershire, Herefordshire, Shropshire and Telford & Wrekin), West Mercia Police, National Probation Service, Health partners (represented by NHS England), and the West Mercia Police & Crime Commissioner. The service delivers the full range of youth justice provision for children, young people, their families and the victims of youth crime.
 4. WMYOS has undergone a phased programme of transition commencing in 2012 with the establishment of a single West Mercia-wide service. This was the first step in a move towards a more integrated single organisation for WMYOS delivery. As previously agreed by cabinet, hosting was initially provided by the Probation Trust. Following subsequent national changes to probation services, Worcestershire County Council took on the role of host agency for WMYOS on an interim basis pending a formal decision on the most suitable longer-term delivery arrangements.
 5. The main reasons for considering a change to WMYOS delivery arrangements include:
 - Recognition of the need for a more sustainable service model that is best positioned to respond with flexibility and innovation to the rapidly changing policy context for both criminal justice and children's services;
 - The opportunity to create a more business-oriented delivery model which drives up performance and quality. Whilst WMYOS performance is mostly good, the WMYOS management board is focused on how this can be progressively improved across all areas;
 - Maximising the impact of the combined resources of the WMYOS partner organisations to improve economies of scale and resilience, reflecting the increasing pressures on national and local resources;
 - Increasing flexibility for deployment of staff and resources across the West Mercia area;
 - Strengthening alignment and integration with the full range of children and young people's and adult services at a local level;
 - Strengthening links with the police and other regional and national criminal justice partners.
 6. Throughout the extended options appraisal process, the overriding consideration of the WMYOS partners has been on which model will offer the best impact on reducing offending and re-offending, whilst securing the best possible outcomes for children, young people, the victims of crime and the wider community.
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Key Considerations

7. The potential benefits of the proposed hosting arrangement with the Office of the Police and Crime Commissioner include:
 - The arrangement will enable the West Mercia YOS partnership to be maintained on a co-terminus basis with related criminal justice and public services. This maximises the impact of combined resources and presents opportunities for shared systems and processes;
 - There is a strong strategic fit, with the Office of the Police and Crime Commissioner sharing responsibility with the WMYOS for reducing re-offending, preventing crime and disorder and supporting victims. This is reflected in the Police and Crime Plan and Local Youth Justice Plan;
 - The Office of the Police and Crime Commissioner shares wider linkage with local safeguarding and community safety arrangements;
 - The Office of the Police and Crime Commissioner and West Mercia Police can offer business support capacity with the economies of scale presented by a large organisation. This will include HR and finance input and will build on recent implementation of a single ICT systems framework for WMYOS, hosted by the police.

 8. The following main elements of the proposed hosting arrangement will form the basis of a formal joint agreement between the WMYOS management board and the Office of the Police and Crime Commissioner:
 - The four Local Authority partners will retain full statutory responsibility for the provision of Youth Justice services, with the associated duty to cooperate placed on all partners as set out in the Crime & Disorder Act 1998 and related legislation. Within this context there will be no delegation or diluting of statutory responsibilities;
 - The WMYOS management board, incorporating the local authority partners, and with representation from the Youth Justice Board, will maintain robust governance and oversight of WMYOS delivery;
 - The WMYOS Management Board will retain responsibility for producing the Local Annual Youth Justice Plan and for securing the resources required for delivery;
 - The main body of WMYOS staff who are currently employed by the local authority partners will transfer under TUPE into the employment of the Office of the Police and Crime Commissioner. This includes the 2 WMYOS staff currently employed by Herefordshire Council;
 - Police, probation and other specialist staff will continue to be deployed in WMYOS on a secondment basis, ensuring strong operational links are maintained with these critical partner organisations;
 - An integrated WMYOS ICT and email framework hosted by West Mercia Police is already in place and will minimise disruption to service delivery at point of transition. Other business support functions will transfer to the Office of the Police and Crime Commissioner and West Mercia Police.
-

9. It is proposed that on 1st April 2016 the service will transfer to the Office of the Police and Crime Commissioner on the basis of the existing WMYOS organisational structure and operating model. A detailed analysis of demand and workflow with a focus on improving efficiency, quality and impact will be undertaken during the implementation phase (October 2015 to March 2016). This will form the basis of proposals for consultation with staff following implementation of the hosting arrangement in April 2016. It is anticipated that proposals for reshaping WMYOS will ensure that the service is able to deliver the best possible performance and quality within a climate of reducing resources for all partners.

Community Impact

10. The principal function of WMYOS and the wider youth justice system is the prevention of offending and re-offending by children and young people.
11. The principal strategic and operational framework for WMYOS is the West Mercia Youth Justice Plan. This supports both the Herefordshire Council Corporate plan and the Children and Young Peoples plan by planning actions to improve the outcomes for children and young people who are in the youth justice system and working to minimise that risks associated with any harm they may pose to others and any harm posed to them.
12. The Youth Justice Plan directly contributes to the reducing re-offending priority in the Herefordshire Community Safety Strategic Plan 2014/17, in particular in relation to identified joint work with the WMYOS management board to reduce the rate of first time entrants to the youth justice system.

Equality and Human Rights

13. The Equality Duty 2010 has three aims (general duty):
 - Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the act
 - Advance equality of opportunity between people who share a protected characteristic and those who do not
 - Foster good relations between people who share a protected characteristic and those that who do not
14. The Public Sector Equality duty (specific duty) requires us to consider how we can positively contribute to the advancement of equality and good relations, and demonstrate that we are paying “due regard” in our decision making in the design of polices and in the delivery of services. The WMYOS is fully aware and committed through its delivery plan of their contractual requirements in regards to Equality legislation.

Financial Implications

15. The service is currently funded through a multi-agency budget of c. 3.9m (2015/16). This is sourced through a mix of funding and ‘in-kind’ contributions from the WMYOS partner agencies, augmented by direct grant funding (around 38% of total WMYOS budget) from the Youth Justice Board for England and Wales. As seen in the business case there is clear indication that the arrangements proposed will lead to greater efficiencies which will enable the organisation to be resilient in light of further national and local funding reductions.
 16. Around 80 (FTE) staff work within the service. These include 14.5 staff deployed from WMYOS partner agencies and 68 staff directly employed by three of the local
-

authority partners.

17. The 2015/16 financial contribution to WMYOS by Herefordshire Council is £232,324. This equates to around 15% of the total local authority contributions to the WMYOS. Herefordshire Council directly employ 2 operational staff within the WMYOS.
18. Transition costs associated with moving into the new arrangements will be met from existing WMYOS limited reserves. There will be no additional costs to Herefordshire associated with the move to the new arrangements. There is potential for savings and efficiencies to be realised on a phased basis from 2016/17.

Legal Implications

19. A PCC hosting arrangement for WMYOS will be an innovative development and the first time that an Office of the Police and Crime Commissioner has taken this lead role within a YOT environment. Local arrangements will be required to clearly demonstrate compliance with the key legal and statutory requirements relating to the Office of the Police and Crime Commissioner and to the provision of Youth Justice Services.
20. The PCC hosting arrangement proposed in this report can be achieved subject to all statutory requirements being fully addressed within the joint agreement.

Risk Management

21. A risk register is included in the attached business case.
22. The council will maintain responsibilities for oversight of performance, impact and risk through the general overview and scrutiny committee and as part of the local community safety partnership.
23. Whilst it is the statutory responsibility of the council to secure the delivery of a youth offending service, the risks are shared with the three other local authorities within West Mercia, the Police, the National Probation Service, the Office of the Police and Crime Commissioner and NHS England.

Consultees

24. All WMYOS partner agencies, WMYOS staff and Trade Union representatives have been consulted extensively throughout the options appraisal process.

Appendices

Appendix A Executive summary of business case (edit of WMYOS Management Board paper)

Background Papers

None identified.

WEST MERCIA YOUTH OFFENDING SERVICE



BUSINESS CASE FOR WMYOS HOSTING BY THE OFFICE OF THE POLICE AND CRIME COMMISSIONER

EXECUTIVE SUMMARY (Edit)

July 2015

1. Purpose of report

1.1 The purpose of this document is to provide the WMYOS Board with a business case and implementation plan for the Office of the Police and Crime Commissioner acting as the 'host' partner for WMYOS from April 2016.

1.2 If the Board are minded to proceed towards this arrangement, formal agreement will be subject to Local Authority Cabinet approvals in the autumn of 2015, and the equivalent formal decision-making process of Police, PCC, Probation and Health partners.

1.3 A formal decision to proceed will be followed by preparation of a detailed Joint agreement between the WMYOS Management Board and the Office of the Police and Crime Commissioner. This will address important details relating to governance, oversight, HR, finance and legal requirements.

1.4 The Board have specified that the business case should address:

- (i) How the legislative and statutory requirements placed on all partners for the provision of youth justice services will be fully addressed.
- (ii) How the hosting arrangement will secure the organisational culture change and business transformation required by partners.
- (iii) Implications for employment arrangements for WMYOS staff.

1.5 Sources of information for this report include:

- Liaison with the Chief Executive and Head of Business Area (Midlands) of the Youth Justice Board for England and Wales
- Liaison with senior technical leads representing the Police and Office of the PCC (Legal; Finance; ICT; HR; Commissioning; Pensions)
- Liaison with HR and Legal representatives from the Local Authorities
- Liaison with WMYOS Management Board
- Engagement sessions with WMYOS staff
- Where relevant, work previously undertaken on the WMYOS options appraisal. This includes liaison with the pension fund actuary Mercers

2. Rationale

2.1 The proposed hosting arrangement with the Office of the Police and Crime Commissioner has strong potential to create optimum conditions for achieving the drivers for change set out in the initial options appraisal. Potential benefits include:

- The model will enable the West Mercia YOS partnership to be maintained on a co-terminus basis with related criminal justice and public services. This maximises the impact of combined resources and presents opportunities for shared systems and processes.
- There is a strong strategic fit, with the Office of the Police and Crime Commissioner sharing responsibility with the WMYOS for reducing re-offending, preventing crime and disorder and supporting victims. This is reflected in the Police and Crime Plan and Local Youth Justice Plan.
- The Office of the Police and Crime Commissioner shares wider linkage with local safeguarding and community safety arrangements

- The Office of the Police and Crime Commissioner and West Mercia Police can offer business support capacity with the economies of scale presented by a large organisation. This will include HR and finance input and will build on recent implementation of a single ICT systems framework for WMYOS, hosted by the Police.

2.2 Key areas addressed within the full report include:

- How the full statutory requirements placed on all partners will be fully addressed within this arrangement.
- How a formal joint agreement coupled with a clear service specification, will enable strong governance and oversight of WMYOS delivery.
- How this model will secure the required cultural and organisational transformation required by the Board.
- What the proposed employment arrangements would be in the event of a transfer of staff under TUPE arrangements.
- How potentially reducing local and national resources will be maximised through this arrangement.
- How the culture and ethos of WMYOS, including a clear focus on wider outcomes for children and young people will be supported within a hosting arrangement

3. Key Features of A Hosting Arrangement

3.1 The main elements of the proposed hosting arrangement are summarised below. These points will form the basis of a joint agreement between the WMYOS Management Board and the Office of the Police and Crime Commissioner:

- The four Local Authority partners will retain **full statutory responsibility** for the provision of Youth Justice services, with the associated duty to cooperate placed on all partners as set out in the Crime & Disorder Act 1998 and related legislation. Within this context there will be no delegation or diluting of statutory responsibilities.
- The WMYOS Management Board will enter into a **formal joint agreement** with the Office of the Police and Crime Commissioner. Delivery and service transformation, with a clear emphasis on securing the best possible outcomes for children, young people and the victims of crime will be performance managed against an outcomes-based service specification. This will fully reflect all statutory requirements, Youth Justice Board national standards and case management guidance.
- The WMYOS Management Board, incorporating the Local Authority partners, and with representation from the Youth Justice Board, will maintain **robust governance and oversight** of WMYOS delivery.
- The WMYOS Management Board will retain responsibility for producing the Local **Annual Youth Justice Plan** and for securing the resources required for delivery. This will include partnership negotiations on contribution levels and agreement on how to respond to changes in local and national funding arrangements.
- WMYOS staff who are currently employed by the Local Authority partners will **transfer under TUPE** into the employment of the Office of the Police and Crime Commissioner. Following TUPE transfer, the outcomes of a review of the operational delivery model for WMYOS may form the basis of an economic, technical or organisational case entailing changes to the workforce which may give rise to changes to terms and conditions.

- The deployment of other partner agency staff will continue to be applied as in the current model. This will include the **secondment and funding arrangements for Police, Probation and other specialist staff**.
- An **integrated WMYOS ICT and email framework** hosted by West Mercia Police is already in place and will minimise disruption to service delivery at point of transition.
- **Other business support functions** will transfer to the Office of the Police and Crime Commissioner and West Mercia Police.
- In the first instance the service will transfer to the Office of the Police and Crime Commissioner on the basis of the existing **WMYOS organisational structure and operating model**. A detailed analysis of demand and workflow with a focus on improving efficiency, quality and impact will be undertaken during the implementation phase (Oct 15 to March 16). This will form the basis of proposals for consultation with staff following implementation of the hosting arrangement in April 2016. It is anticipated that proposals for reshaping WMYOS will reflect significant resource and funding pressures going forward from 2016/17.

4. Joint Agreement

- 4.1 The details of the hosting arrangement will be set out in a formal joint agreement between the WMYOS Management Board and the Office of the Police and Crime Commissioner.
- 4.2 This will form the basis of a contract between the two parties with the principal aim of securing an effective and sustainable Youth Offending Service in West Mercia. The main outcomes specified in the joint agreement will be:
- Preventing offending by children and young people
 - Reducing youth crime and the fear of crime
 - Reducing the impact of crime on victims and local communities
- 4.3 An outcomes-based service specification for the full range of WMYOS provision will be included within the joint agreement. This will emphasise the values and ethos of the service, with an emphasis on prevention and securing strong links with children and young people's services at a local level.
- 4.4 The joint agreement will reflect **Procurement Contract Regulations** 2015 (sec 12) which allow for exemption from open procurement where it can be shown that public bodies are working together to deliver public services on a non profit-making basis.
- 4.5 Some key responsibilities of the WMYOS Management Board within this arrangement will include:
- (i) Securing the Annual Youth Justice Plan and ensuring that multi-agency resources are in place to deliver agreed priorities. This will include ensuring a collaborative approach to the management of resources and resource pressures, and brokering agreement on how changes or reductions in funding are managed on a shared basis by the WMYOS partnership.
 - (ii) Securing a robust delivery model for YOS provision (through the proposed hosting arrangement) as set out in a formal agreement with the Office of the Police and Crime Commissioner against an agreed outcomes-based service specification.
 - (iii) Performance oversight of WMYOS service delivery outcomes. This will include individual Board members taking a 'champion' role in relation to specific areas of WMYOS delivery, organisational and culture change.

4.6 Key responsibilities for the Office of the Police and Crime Commissioner within this arrangement will include:

- (i) Day to day oversight of the delivery, culture change and business transformation of WMYOS provision on behalf of the WMYOS Management Board. This will include significant organisational change during year 1 (2016/17).
- (ii) Provision of employment arrangements and business support functions for WMYOS, in-line with funding arrangements to be agreed with the WMYOS Management Board.
- (iii) Securing robust performance management and quality arrangements for WMYOS with a clear line of accountability and reporting to the WMYOS Management Board.

5. Legal basis

5.1 A PCC hosting arrangement for WMYOS will be an innovative development and the first time that an Office of the Police and Crime Commissioner has taken this lead role within a YOT environment. Local arrangements will be required to clearly demonstrate compliance with the key legal and statutory requirements relating to the Office of the Police and Crime Commissioner and to the provision of Youth Justice services.

5.2 Legal representatives of the Local Authorities, Police and Office of the Police and Crime Commissioner, in discussion with the Youth Justice Board for England and Wales have reviewed compliance of the proposed hosting arrangement with the relevant legislative framework and are of the view that all statutory requirements can be fully met. Furthermore, it is believed that the synergies created by this approach will strengthen the capacity of the WMYOS partnership and the Office of the Police and Crime Commissioner to achieve their respective strategic priorities and to secure better value and improved outcomes for local communities.

6. Staffing

6.1 It is proposed that the 68 Local Authority employees will transfer into the employment of the Office of the Police and Crime Commissioner on the agreed implementation date. All staff will transfer over in the first instance with their current terms and conditions. These will include qualified social workers registered with the Health and Care Professions Council.

6.2 The Office of the Police and Crime Commissioner is an admitted body of the Local Government Pension Scheme (LGPS) and a member of the Worcestershire Pension Fund. As such, WMYOS employees of Worcestershire and Herefordshire Councils will experience minimal change in pension arrangements. Telford and Wrekin employees will be given the option to transfer in from the Shropshire Pension Fund.

6.3 It is anticipated that staff working within WMYOS on a secondment basis from WMYOS partner agencies will continue to be deployed in the WMYOS on a similar basis within the proposed hosting arrangement.

7. Resources

7.1 An indicative three-year financial forecast has been prepared for this business case. This is included overleaf – with a fuller analysis included within the main report. This is an indicative forecast for illustrative purposes only and will need to be agreed in detail as part of the preparation of the joint agreement prior to implementation. The indicative forecast includes analysis of current funding contributions from partners (including consideration of ‘hidden costs’) and of how available resources are currently utilised within the service. Forecasting has taken account of data on workflow and

demand for WMYOS provision, to identify trends as an indicator of anticipated future levels of demand.

- 7.2 The indicative forecast anticipates significant resource and funding pressures progressively impacting on WMYOS over the three year period from 2016/17. There is potential for a sustainable model subject to efficiencies being achieved year on year through service redesign and the introduction of more efficient working practices.
- 7.3 The joint agreement will set out how the WMYOS Management Board will collaborate on key decisions in the event of a shortfall in resources or reductions in partner contributions.
- 7.4 Resources to support organisational change are identified as a separate transition cost area to be met from WMYOS partnership reserves.

Indicative Financial Forecast

Budget Description	Transition Costs:			
	Oct '15 - March '16	Year 1	Year 2	Year 3
	£	£	£	£
INCOME				
Total Partner income		2,231,234	2,231,234	2,231,234
Total YJB income		1,495,153	1,493,153	1,493,153
Total PCC Income		180,293	180,293	180,293
Reserves funding: transition costs	57,000			
TOTAL INCOME	57,000	3,906,680	3,904,680	3,904,680
EXPENDITURE				
Core Service Delivery	0	2,953,921	2,772,162	2,772,162
Leadership & Management	0	322,830	299,422	299,422
Back office/Support Functions	57,000	208,086	197,682	197,682
Overheads/Infrastructure	0	463,842	440,650	440,650
TOTAL EXPENDITURE	57,000	3,948,679	3,709,915	3,709,915
SAVINGS				
Pay savings		(120,621)	0	0
Non-Pay savings		50,000	0	0
TOTAL SAVINGS	0	(70,621)	0	0
Savings as % of total expenditure		-3.1%	0.0%	0.0%
Annual Surplus / (Deficit)	0	28,622	194,765	194,765
Retained Profit or (Loss)	0	28,622	223,386	418,151

8. Implementation

- 8.1 The proposed timeline for implementation is predicated on formal approval being secured from Council Cabinets by end October 2015. This approval will initiate implementation activity with a view to the new arrangements being in place and **fully functioning from April 2016**. Experience suggests that this is an achievable timeframe, subject to sufficient preparatory work having been undertaken in the period up to end September 2015. This will include:

- Progressing the Business Case through each Local Authority to ensure thorough legal, financial and technical scrutiny has been applied prior to formal consideration by Council Cabinets
- Engagement of Lead Members and Chief Executives / MD
- Preparation and submission of reports to Council Cabinets
- Agreement on programme management arrangements, what capacity is required and how this will be funded from September 2016.
- Continuing engagement with WMYOS staff and Trade Unions

8.2 The table below provides an overview of the pathway towards full implementation following Cabinet approval.

	Key Milestones 2015/16	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr
1	Formal Cabinet approval secured	■	■						
2	Programme management arrangements in place		■						
3	Joint agreement established between WMYOS Management Board & PCC			■					
4	Review of WMYOS operational model to inform forward planning			■	■				
5	SLA's agreed for business support services					■			
6	Complete TUPE transfer of staff by 31.3.15							■	
7	Commencement of hosting arrangement								■

8.3 Project management of implementation will comprise of the following inter-dependent workstreams:

Delivery

- Review of WMYOS operational model and proposals for reshaping
- Business support arrangements

Legal & Commercial

- Completion of joint agreement (including governance arrangements)
- Finalise service specification

Staff & Stakeholders

- Engagement and consultation with staff and Trade Unions
- Stakeholder and partnership engagement

Resources

- Robust financial planning and budget-setting
- Pension fund arrangements

8.4 An early decision will be required from the Board on how capacity and leadership arrangements will be secured for programme management. Indicative costs have been included in the budget forecast.

WMYOS Hosting by the Office of the Police and Crime Commissioner - Risk Register – (Updated July 2015)

Risk Area	Key Risks	Impact	Likelihood	Current Mitigation	Risk Level & Owner	
Governance & Oversight	1.1	Governance arrangements are not fit for purpose – adverse impact on oversight and accountability	High	Medium	Governance and oversight arrangements to be set out in formal joint agreement followed by regular review	Initials
	1.2	Board oversight of performance and quality is weak	High	Medium	Performance scorecard model for each level of governance and oversight to be agreed for high level overview & challenge (set out in Service Spec)	
	1.3	Communication between Board and staff is poor, impacting on culture and effectiveness	High	Medium	Priority for implementation plan – building on high level of staff engagement throughout the development process	
	1.4	Management oversight of frontline practice is weak	High	Medium	Performance management, quality framework and supervision models to be agreed prior to implementation (Ref: Joint Agreement and Service Spec)	
Finance & Resources	2.1	Insufficient resources secured to deliver priorities	High	Medium	WMYOS Management Board will work closely with Office of the PCC to anticipate and manage demand on a collaborative basis	
	2.2	Demand for services exceeds capacity to deliver	High	Medium	As in 2.1 above	
	2.3	Expenditure exceeds income for sustained period	High	Medium	Financial reporting to be incorporated in joint agreement to ensure consistent reporting and collaboration on cost pressures	
	2.4	TUPE transfer arrangements lead to employee challenges	High	Medium	Clear ETO reasons will be evidenced for any changes to terms and conditions following service review post-TUPE	
Service Delivery	3.1	Quality of service delivery is poor, with adverse reputational impact	High	Low	Quality framework and reporting arrangements to be agreed pre-implementation (Ref: Joint Agreement and Service Spec)	
	3.2	Staff turnover has adverse impact on quality and capacity of delivery to clients	Medium	High	Reporting arrangements to include workforce monitoring	
	3.3	Deterioration in performance against terms set out in the joint agreement	High	Medium	Oversight as in 1.2 above. Any deterioration in performance will be swiftly picked up and addressed with WMYOS Management Board	
	3.4	Alignment and integration with local partner agency services is weak	High	Medium	Contract arrangements with each WMYOS partner to identify how alignment will be differentiated to meet local requirements	

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Current Assessment of Overall Risk	
1	Remains High risk – taking account of all mitigating action taken
2	Medium risk – assuming mitigating action is implemented
3	Low risk – assuming mitigating action is implemented



