

REPLACE WITH NEW FRONT COVER

HEREFORDSHIRE LOCAL PLAN

Hereford Area Plan

Housing and Employment Site Options Consultation

August 2018

CONTENTS		Page
	List of sites	3
1	Overview	5
2	Policy Context	10
	National Planning Policy for Housing	10
	National Planning Policy for Employment Provision	11
	Local Plan Core Strategy	11
	Neighbourhood Development Plans	15
3	Evidence Base and Other Plans and Proposals	15
	Sustainability Appraisal	17
4	Progress with Identifying Housing Sites	18
	Stage 1	18
	Stage 2	19
	Consultation Groups	19
5	Technical Input	20
	Additional considerations	22
	Summary of Site Outcomes	25
6	Next Steps	26
	Appendices	29
	Appendix 1 Site Schedule example	30
	Appendix 2 Sites taken forward to Stage 2	32
	Appendix 3 Capacity Estimates of housing sites	36
	Appendix 4 Summary of Site Assessments	39
	Map Legend	40
	Housing Site Assessments	42
	Employment Site Assessments	111

List of sites

Site Ref	Housing Site Address	Page
Ayl01	Rockfield Road	41
Ayl14	Aylestone Park	43
Ayl15	Land at Walney House Farm	44
Ayl16	Land north of St Francis Xaviers school	45
Bel08	Former golf club Belmont	46
Bel13	Land at Merryhill Farm	47
Bel14	Argyll Rise, HR2 7BN	48
Bel15	Home Farm	49
Bur09	Land at Cot Barn Farm	50
Bur10	Land adjacent to Meadow Bank	51
Bur12	Land to the West of Burcott Farm	52
Bur17	Land at Burcott Farm	53
Bur18	Land adjacent to Rose Gardens Public House	54
Bur21	Land opposite Staniers Way	55
Bur23	Land adjacent to the Willows	56
Bur29	Land adjacent to the Rose Gardens	57
Bur30	Land at Attwood Lane	58
Bur31	Part of Burcott Farm	59
Bur32	The Orchard, Lyde	60
Cen08	Car Park opposite John Haider building	61
Cen21	Edgar Street Grid	62
Cen22	Land at Bus Station/Car park	63
Cen27	Police Station, Bath Street	64
Cen28	Fire Station, St Owens Street	65
Cen29	Wyebridge Motors	66
Cen30	Land at Symonds Street	67
Cen31	Union Walk car park	68
Cen32	Land between Bath St and Gaol St	69
Cre25	Wyevale nurseries	70
Hol12a	Land at Bullingham Lane	72
Hol12b	Land East of Bullingham Lane	74
Hol13	Grafton Lane	76
Hol14	Grafton Haulage	78
Stm01	Land north of Redhill Cottages	79
Stm05	Land opposite Leys Farm	81
Stm17	Land to rear of Grafton House	82
Stn05	Former health authority offices	83
Stn21	Former Bus depot, Friar Street	84
Thr19	Land adjacent to Wyevale	86
Thr21	Land west of Huntington Lane	87
Thr22	Land east of Huntington Lane	88

Thr23	Land north of Lower Hill Farm	90
Thr24	Lower Hill Farm	92
Thr26a	Land at Huntington	93
Thr28	Bay Horse Motors	95
Thr29	Hereford Racecourse	96
Thr30	Former Sportsman Pub	98
Thr32	Land off Whitecross Rd	99
Thr34	Faraday Road	100
Thr35	Wyevale Garden Centre	101
Thr37	Land at Grandstand Road (north)	103
Tup20	Bartonsham Farm Dairy	104
Tup22	TA site	105
Tup25	Land adjacent to Foley Trading Estate (Tup02)	106
Tup26	Land at Queenswood Drive	108
Tup27	Land at the Paddock, Hampton Dene Road	109
Tup28	Land at Broadlands Lane	110

Site Ref	Employment site address	Page no.
ES1	Land at Livestock market	111
ES3	Land to the west of Ross Rd A49	113
ES4	Land to the East of Ross Rd A49	114
ES5	Land north of Roman Road	115
ES6	Land at Rotherwas	116

Hereford Area Plan – Housing and Employment Site Options Consultation

SECTION 1: OVERVIEW

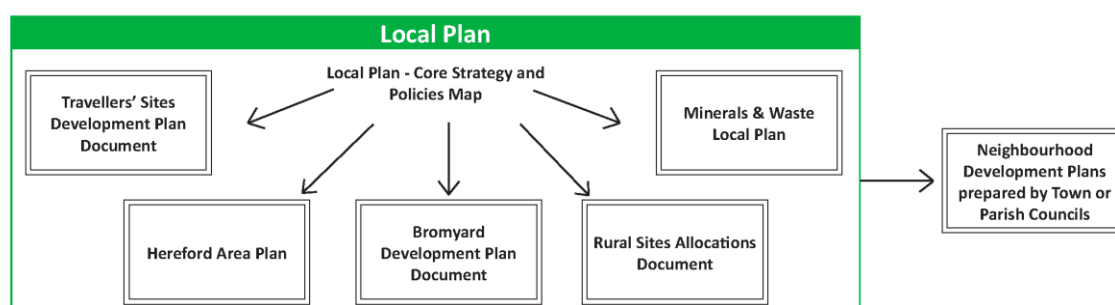
1.1 What is the Hereford Area Plan?

The Herefordshire Local Plan Core Strategy, adopted in 2015, sets out an overall framework for the scale and location of new development across the county which aims to deliver housing based growth and jobs, complimentary infrastructure, such as schools and homes for a mixture of people including those seeking affordable homes to create liveable and distinctive communities.

1.2 The **Hereford Area Plan (HAP)** will set out the detailed proposals to ensure the full delivery of the targets for Hereford in the adopted Core Strategy. It will include policies and proposals for growth in the historic city of Hereford including specific proposals for housing, employment and urban regeneration. In doing so, the plan must also protect and enhance its attractive built and natural environment, providing for its current and future community needs.

1.3 The document will be a statutory element of the county's Local Plan, and will be one of a number of development plan documents (DPDs) currently being prepared which will provide detailed planning policies for specific locations or issues. The other DPDs include the Travellers' Sites DPD, Rural Areas Site Allocations DPD and Herefordshire Minerals and Waste Local Plan. In addition, more than one hundred neighbourhood development plans have either been prepared or are being prepared across Herefordshire. The following diagram sets out the relationship of the documents within the Local Plan:

Figure 1 – The relationship between the various elements of the Local Plan



1.4 What are the site options for the Hereford Area Plan (HAP)?

This site options paper sets out to identify a range of sites to be considered as potential allocations for housing and employment uses within the HAP. It asks questions to seek the public's views on the approach taken in the document including the site suggestions, or whether other sites and proposals should be considered.

1.5 This consultation focuses on potential housing and employment sites for inclusion within the HAP. The plan will be subject to other consultation at other stages of preparation and will be subject to examination in public by an independent Inspector before it can be adopted by the Council.

- 1.6 Once sites are allocated in the HAP and the plan is adopted by the Council, the Proposals map will be updated to reflect the new policies and proposals.
- 1.7 The Site Options Paper sets out details of the potential housing and employment land allocations for the HAP. See Figure 2a, 2b & 2c. The city has been split into five major areas: - Central area, North West, North East, South West and South East. There are five **Site Summary Documents** for each of these areas setting out the conclusions for the relevant housing sites. There is also a separate Summary document for all the Employment Sites. All sites include a map and a summary conclusion and can be found on the website in addition to this document
- 1.8 There are also five more detailed **Technical Site Assessments** for each of these areas for all the housing sites. There is an additional document for the technical assessment of all the employment sites. All sites include a map with a number of comments on varying technical aspects for each site.
- 1.9 **Public Consultation**
All documents are available to view on the Council's webpage www.herefordshire.gov.uk/herefordareaplan . The Council is seeking feedback on this Hereford Area Plan Housing and Employment Site Options Paper. Please see accompanying short **questionnaire** to make a response.
- 1.10 The Council welcomes comments on this Options Paper and as with other aspects of the Regulation 18 consultation; responses should be submitted so that they are received by 1st October 2018.
- 1.11 Written comments can be submitted in the form of a letter or email and should reach Herefordshire Council, at the address shown below,

Hereford Area Plan Responses
Forward Planning
Herefordshire Council
Plough Lane
Hereford
HR4 0XH

Email: ldf@herefordshire.gov.uk

- 1.12 Herefordshire Council encourages the use of email as this makes the processing of comments much easier and quicker.

Figure 2a. HAP Site Options for Housing potential

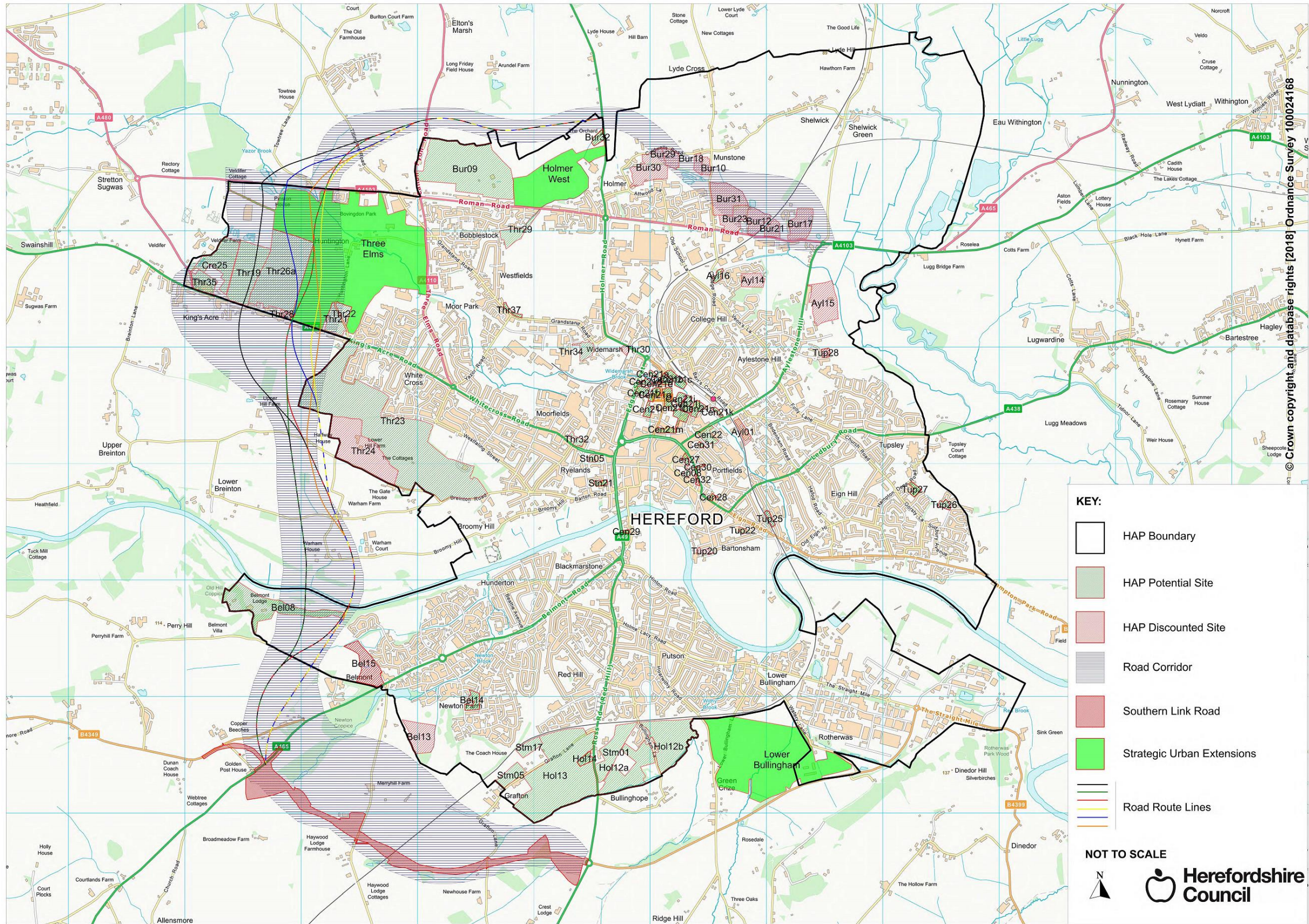


Figure 2b HAP Site Options (City Centre) for housing potential

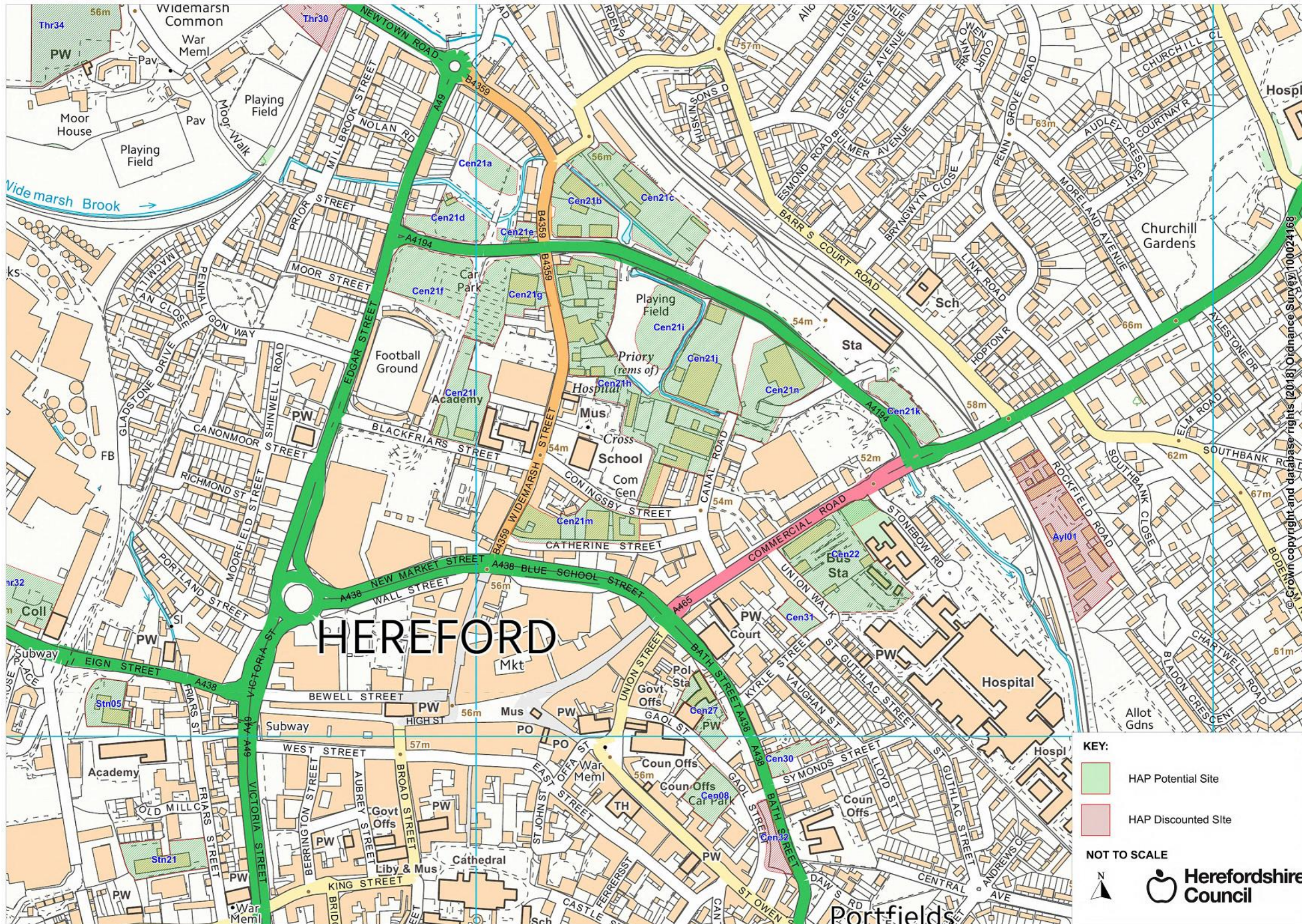
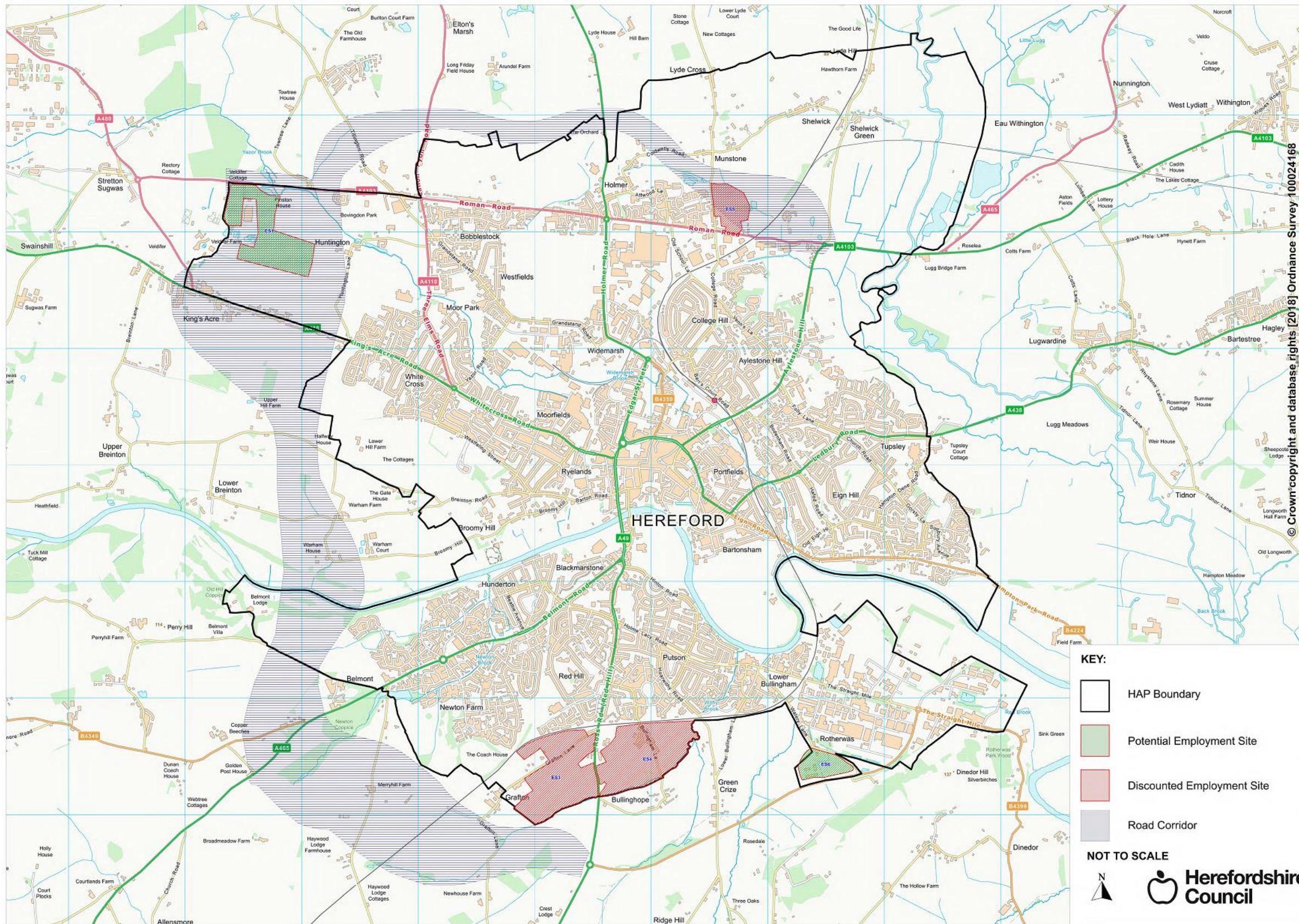


Figure 2c Employment Site Options



2.0 SECTION 2 POLICY CONTEXT

2.1 In preparing this Paper, Herefordshire Council has had full regard to Government policy, as outlined in the NPPF, and the local strategic policy context, as set out in HD1 of the Core Strategy.

2.2 The HAP must be consistent with national policy and it must enable the delivery of sustainable development. The plan should also have regard to other relevant plans and strategies.

2.3 National Planning Policy for Housing

The policy context for the Core Strategy and the HAP is set by the National Planning Policy Framework (NPPF). A revised NPPF¹ was published on 24 July 2018 and this replaces the previous NPPF published in 2012. The NPPF sets out the Government's planning policies for England and how these should be applied.

2.4 Key to the NPPF is that planning should contribute to the achievement of sustainable development. Paragraph 7 & 8 of the NPPF states that there are three overarching objectives, which 'are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)'. These three objectives refer to the economic, social and environmental aspects when planning for places.

2.5 The NPPF sets out the ultimate task when plan making at paragraph 16, as plans should

a) be prepared with the objective of contributing to the achievement of sustainable development¹⁰²;

b) be prepared positively, in a way that is aspirational but deliverable;

c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

2.6 The policies for the HAP will be expected to follow NPPF policies relating to non- strategic policies at paragraph 28 whereby detailed policies for specific areas can include allocating

¹ NPPF 2018 <https://www.gov.uk/government/publications/national-planning-policy-framework--2#history>

² This is a legal requirement of local planning authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act 2004).

sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.

- 2.7 Crucially the National Framework states at paragraph 31 that Local Plans should be underpinned by relevant and up to date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned and take into account relevant market signals.
- 2.8 Section 5 (paragraph 59 onwards) of the NPPF sets out the framework for delivering a sufficient supply of homes. Some headlines from paragraph 67 & 68 show what is expected of local authorities when planning for housing:

"Planning policies should:

- *Identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.*
- *Identify a supply of specific deliverable sites for years one to five and specific developable sites or broad locations for growth over a 15 year time period.*
- *Identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare unless there are strong reasons why it cannot be achieved".*
- *Support the development of windfall sites through their policies and decisions*
- *Work with developers to encourage the subdivision of large sites where this could help to speed up the delivery of homes.*

- 2.9 To provide more detail and guidance to the National Planning Policy Framework (NPPF), the Government published the National Planning Practice Guidance (NPPG) online in March 2014. The only specific reference to site allocation in the NPPG is at Paragraph: 010 Reference ID: 12-010-20140306³ which states:

"Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions)". This essentially means Local Plans should make it clear

- what development is going to be delivered;
- where it will be;
- when it will be done;
- how it will be done.

2.10 **National Planning Policy for Employment provision**

The National Planning Policy Framework (NPPF) provides a clear position that planning policies should help create the conditions in which businesses can invest, expand and adapt. Paragraph 80 goes on to emphasise that 'significant weight should be placed on the need to

³ NPPG, Local Plans: Key Issues

support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

2.11 Paragraph 81 specifically states that planning policies should:

- a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
- b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
- d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

2.12 The practice guidance which accompanies the NPPF provides a framework for assessing the need for employment land. The assessment should identify all sites and broad locations regardless of the amount of development needed to provide an audit of available land. The process of the assessment will, however, provide the information to enable an identification of sites and locations suitable for the required development.

2.13 **Local Plan Core Strategy**

The Local Plan Core Strategy for Herefordshire adopted in October 2015, provides a framework for the growth of the County up to 2031, broadly setting out how much and where development will take place, and a list of infrastructure requirements across the county. The Core Strategy includes an indication of the scale and distribution of housing in the County including a housing target for Hereford.

2.14 Approximately half the housing for Hereford has been identified at four strategic locations within and around the city. The identification of the remaining half will be set out in the HAP. The council is also seeking to identify additional employment land.

2.15 The purpose of this paper is to focus on the options for identifying sites required to achieve the Core Strategy target and explain how the Council has assessed potential development sites with particular reference to housing and employment. It will form the basis for the selection of housing and employment allocations in the HAP and provides transparency of the process of site selection.

2.16 This document has been prepared to facilitate consultation with key stakeholders and the local community. In particular it continues the Council's dialogue with those organisations and individuals that have previously expressed an interest in the plan making process.

2.17 **Core Strategy Policy HD1 Hereford**

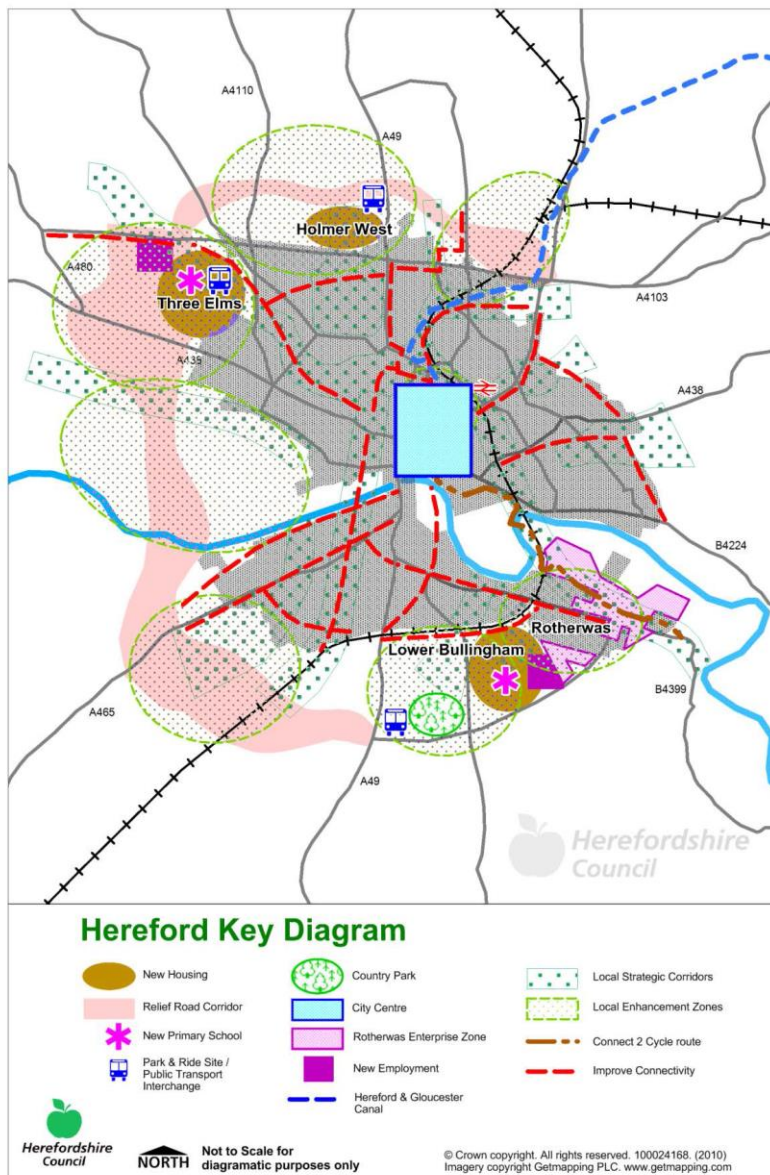
The allocation of sites for future development is an essential part of plan making. New sites are required to accommodate an ever growing population, to address economic needs and improve the quality of life for the community. The Council's objective is to identify a range of sites that will make a positive contribution to sustainable development in the city.

2.18 Firstly, the Core Strategy in policy HD1 gives a clear indication as to where strategic housing growth can take place identifying broad areas as shown in Figure 3 below. However, the strategic sites account for around half of the housing target for Hereford as shown in Table 1 below. Therefore the HAP will focus on delivering the residual requirements of housing development to achieve the Core Strategy targets.

Table 1. Major residential development in Hereford

Total requirement for Hereford as set out in HD1	6,500
Strategic Sites:	New dwellings
• Hereford City Centre (HD2)	
• Northern Urban Expansion Area (HD4)	800
• Western Urban Expansion Area (HD5)	500
• Southern Urban Expansion Area (HD6)	1000
Total for Urban Expansion sites	3300
Remaining Residual Requirement	3200

Figure 3 Hereford Key Diagram⁴ Strategic Urban Extensions



2.19 The target of 3,200 dwellings does not mean that land for 3,200 dwellings has to be allocated for housing. From the overall total, existing planning permissions, dwellings still remaining to be built and completed dwellings⁵ will be deducted. These sites will all count towards the overall target. The figures are updated annually.

NB figures will constantly change as planning permissions are granted through the course of production of this plan.

2.20 The HAP will need to consider all sites identified to establish whether or not they are deemed suitable for the Plan. It may be necessary to identify additional strategic sites in the context of Hereford. Adjoining and Neighbourhood Planning Groups will need to take this into account when devising proposals for their areas.

⁴ Figure 4.2. Hereford Core Strategy 2011-2031

⁵ Since 2011 start of the Plan Period

2.21 Core Strategy HD7 Hereford Employment Provision

The policy clearly sets out an ambition to accommodate employment land across the city. There is the possibility for such development both within the city centre and as part of the strategic urban extensions. Currently the following areas feature as locations for employment land delivery:

- 10Ha of employment land at the Western Urban Extension in Three Elms area
- Around 5ha of employment land at the Southern Urban Expansion Area in the Lower Bullingham area.
- Hereford Enterprise Zone will continue to be a major location for new businesses.

2.22 The policy does encourage provision of new areas of employment land and this is primarily through the development of strategic urban extension sites. However, employment land at Rotherwas is quickly filling up as the take up rate for businesses wishing to locate here has been higher than expected. It is likely that the land will be full to capacity in the next 5 years. Since the drafting of the Core Strategy, the **Economic Vision** was launched in 2017.

2.23 Herefordshire's emerging Economic Vision, provides a key context to regeneration and investment work in the county. The vision identifies priority projects that will support economic growth or generate a higher value economy. The HAP provides an opportunity to provide a land use policy framework to enable the projects in the economic vision to be delivered. Therefore it is necessary to ensure there is adequate provision within and around the city to last until the end of the Plan period (2031).

2.24 With current take up rates of employment land in Hereford, and particularly at the Enterprise Zone it is considered appropriate to identify further land to ensure adequate provision of employment land for the plan period. Therefore, this paper seeks to consider options for additional employment sites.

2.25 The Employment Land Study Appendices 2012, sets out a detailed appraisal criteria for qualitative assessment of the existing employment sites. Some major aspects of this criteria were looked at as a starting point in identifying new sites:

- Proximity to an A road suitable for HGVs with accessible surrounding road network
- Adjoining land uses and compatibility
- Similar to the approach to site assessments for housing, the environmental assessment of constraints was applied.

These criteria have formed part of the employment land assessment.

2.26 Neighbourhood Development Plans

Parish and Town Councils have the opportunity to prepare neighbourhood plans for their areas which, once 'made' (i.e. adopted by the local authority after a successful independent examination and community referendum), form part of the development plan.

2.27 Neighbourhood plans can develop policies and proposals to address local place-based issues but are required to be in general conformity with higher level plans such as the Core Strategy.

2.28 Neighbourhood plans may deal with non-strategic planning issues in accordance with the approach described in NPPF paragraph 185 and should be in general conformity with the strategic policies for the local area. In the HAP area a Neighbourhood Development Plan has been made for Belmont Rural area and much of the Hereford Enterprise Zone fall within the made Lower Bullingham NDP. Other NDPs are in preparation for Holmer and Shelwick (entirely within the HAP area and for Dinedor which includes a small part of the enterprise zone within the HAP area. It will be important to ensure consistency between the HAP and Neighbourhood Development Plans.

2.29 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'. In terms of the HAP, housing sites of around 200 units or employment allocations of around 5 hectares are defined as being strategic policies contained within the development plan for the area in terms of paragraph 6 Schedule 4B of the Town and Country Planning Act (1990).

3.0 SECTION 3 EVIDENCE AND OTHER PLANS AND PROPOSALS

A significant body of evidence helped to inform the strategic policy choices in Core Strategy policy HD1. Many of these studies also provide a valuable starting point for the evidence required to underpin the allocation of sites for future development such as the strategic sites set out in Table 1.

3.1 The most relevant study for the identification of potential development sites is the Hereford **Housing and Employment Land Availability Assessment (HELAA)**⁶ which assesses the land available over a 15 year period. The HELAA (and earlier SHLAAs⁷) was the product of 'Call for Sites exercises going as far back as 2007 with the most recent in 2017. It provides the basis for the initial list of potential development sites in Hereford. It includes an assessment of the deliverability of the sites they identify, as well as using the parameters set-out in the National Planning Policy Framework (NPPF) to assess their suitability for future housing development. The sites identified in the Site Options Paper have mainly come forward via the HELAA.

3.2 Additional evidence base documents will be produced or updated to help inform the preparation of the HAP. Foremost amongst these will be a detailed **Flood Risk Assessment** which is being commissioned by Herefordshire Council and the Environment Agency.

⁶ HELAA

https://www.herefordshire.gov.uk/downloads/download/215/hereford_housing_and_economic_land_availability_assessment_helaa

⁷ SHLAA: Strategic Housing Land Availability Assessment

- 3.3 A Historic England **Urban Panel Review Paper 2017**⁸ provides an evaluation of the city centre area and how the proposed university could integrate within the city. A number of its recommendations are being addressed as part of developing the evidence for the HAP.
- 3.4 One such piece of work which has been completed is the **Historic Area Assessment of Hereford City April 2018**. The report constitutes a Historic Area Assessment of the central part of the city of Hereford. It summarises information concerning a series of study areas which were identified as part of the brief, and concludes with overall comments on the significance of the city, and statements concerning strengths, weaknesses and opportunities. There is a focus on enhancement of open space, public realm and areas that could potentially benefit from regeneration/redevelopment.
- 3.5 The Council is also in the process of commissioning a **Design Supplementary Planning Document (SPD)** for the city centre which will include a design strategy looking at key views, including a building heights strategy, public realm advice, the approach to open space, transport infrastructure and the treatment of the River Wye frontage.
- 3.6 In addition, the **Hereford Transport Package (HTP)**⁹ has completed its second public consultation on seven possible routes for the city bypass. A preferred route will be consulted on in autumn 2018. The Cabinet meeting scheduled for 19th July 2018. The preferred route may impact on sites set out in the Site Options and reference to this is made in the site summaries. Further work to model the potential traffic impacts of the potential site options is also likely to be required to help identify an appropriate set of housing and employment allocations.
- 3.7 There is ongoing work with regard to a **Parking Strategy** for the city as the current thinking is that car parking within the city could be rationalised and a multi storey car park would provide the displaced capacity on a single site.
- 3.8 **New Model in Technology & Engineering University**
The New Model in Technology & Engineering (NMiTE) university will be the UK's first new university for 40 years. NMiTE is projecting a student population of five thousand by 2031. NMiTE aims to address the shortage of graduate engineers in the Marches and the UK.
- 3.9 The Council is working closely with the University to ensure plans are deliverable. A challenge for the HAP is outlining a suite of policies and proposals which can accommodate the demands for land for a variety of uses. This could partially be addressed by shared facilities/ buildings to achieve a more efficient use of land. Therefore, although sites in the city centre have been assessed for housing potential as part of the site options paper, there is the possibility that they may be also appropriate for other uses such as the university to either accommodate students or identified as university educational buildings.

⁸ Urban Panel Review Paper <https://content.historicengland.org.uk/content/docs/committees-panels/urban-panel-review-paper-hereford-oct17.pdf>

⁹ https://www.herefordshire.gov.uk/info/200196/roads/252/herford_2020/4

3.10 This existing and emerging evidence base provides information to the Council to assess the potential impact of planned new development and growth over the plan period, helping to ensure the promotion of sustainable development through the plan making process.

3.11 Housing for Self-build

Changes to the NPPG were made on 31st March 2016 concerning self-build and custom build. Thereafter, the Council established a Self-Build and Custom Build Register in April 2016, as per the regulations of the Self-Build and Custom Housebuilding Act. The HAP will need to consider how to encourage self and custom build housing to help meet the demand on the Herefordshire Self and Custom Build Register.

3.12 Sustainability Appraisal and Habitats Regulation Assessment

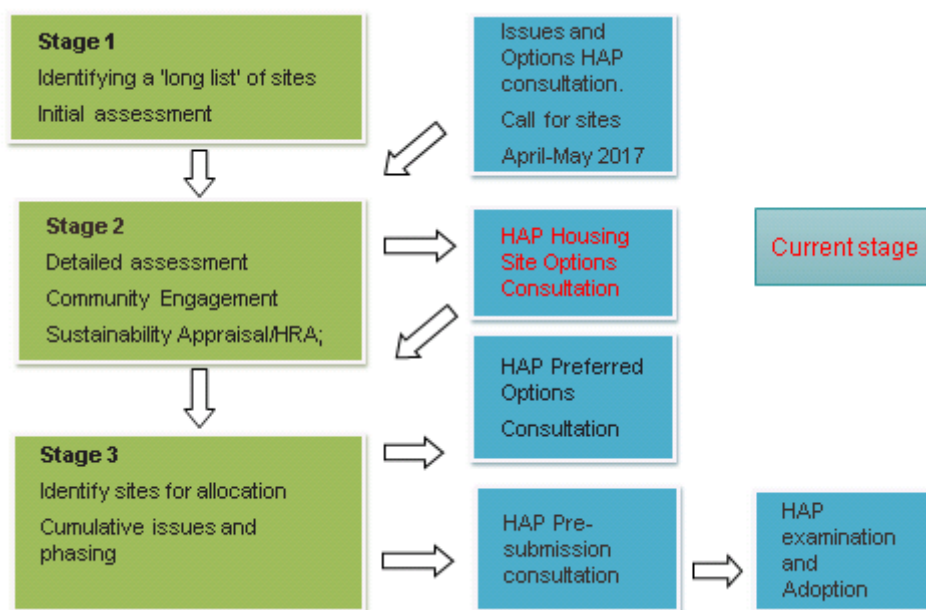
Sustainability Appraisal (SA) is integral to the preparation and development of a Local Plan and identifies how sustainable development is being addressed. It meets the EU requirement for Strategic Environmental Assessment (SEA) by considering the environmental effects of the plan alongside potential economic and social impacts. All sites will be subject to the Sustainability Appraisal. Full details of the SA/SEA process are set out within the SA/ Report which is an accompanying document to this report

Habitat Regulations Assessment (HRA) ensures compliance with the EU Habitats Directive by considering the potential effects of the plan, either individually or in combination with other plans or projects that may affect the Site of Special Scientific Interest (SSSI) and other European Sites. A HRA will not be necessary to undertake at this stage of the process in the development of the HAP Options but will be a requirement as sites are refined further down the line.

4.0 SECTION 4 PROGRESS WITH HOUSING SITES

4.1 In April 2017, the Emerging Potential Housing Options¹⁰ Paper was published to accompany the first consultation on the HAP Issues and Options Consultation. It was a topic paper which informed the background to the housing section of the Issues and Options consultation Paper. It set out the approach to the site selection methodology. The methodology for identifying and selecting the most suitable sites for allocation was set out through three major stages running alongside production of the HAP.

Figure 4. Stages of Assessment for housing allocation



4.2 Stage 1

Stage 1 identified a long list of potential sites derived from the HELAA document. There were 31 sites identified for further assessment. A total of 109 sites were discounted at stage 1 for the following reasons:

- Some sites fell below the 10 dwellings capacity threshold or 0.4 ha in site size.
- Sites in Flood Zones 3 were discounted unless there was clear evidence to demonstrate that a scheme could feasibly overcome this constraint;
- Sites where availability is unknown.
- Sites with planning permission. These sites are already deemed suitable as a result of planning permission. There is no need to reassess them unless new information emerges that would alter their potential for delivery. The NPPF states *Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no*

¹⁰ HAP Emerging Potential Housing Options

https://www.herefordshire.gov.uk/downloads/file/13985/hereford_area_plan_-_potential_housing_options

longer a demand for the type of units or sites have long term phasing plans, NPPF footnote 1.

- Many sites were identified as being outside the HAP Area Boundary

The sieved out sites are listed in Appendix 4 of the Topic Paper.¹¹

4.3 Stage 2

The following general principles have been applied when assessing sites at Stage 2.

Firstly, a site assessment schedule has been used to undertake the assessment of all sites for this stage of the process (see Appendix 1). The site assessment process is an iterative one, in that more information on sites may be added on to the assessment after this consultation takes place.

From the initial site assessments, sites have been colour coded as follows:

- Green** sites which have potential to be allocated for housing but there may be issues which need to be resolved.
- Red** sites which are not considered suitable for allocation for housing.

- 4.4 The methodology places considerable emphasis on examining the potential for impacts to be mitigated where necessary. Mitigation can either reduce to acceptable levels any impacts or remove them entirely. Mitigation can be achieved in a number of ways depending on the impact type, for example by providing new or enhanced spaces or habitats where existing areas are impacted or by using design and landscaping to mitigate visual impact. Mitigation measures for Highways impacts have yet to be ascertained. The approach to Stage 3 of the site assessment is set out in the Next Steps (Section 6) of this document.

4.5 Consultation Groups

To develop the housing and employment sites further an internal **HAP Officer Working Group** was set up to bring forward the HAP Site Options. It has representation from a variety of internal expertise including Development Management, Highways, Landscape, Ecology, Built Conservation, Open Space and Archaeology. Advice from the various technical areas has helped to guide the methodology and approach to the site assessments.

- 4.6 The **Hereford Area Plan Reference Group** also had the opportunity to input into this stage of the process. The Hereford Area Plan Reference Group is chaired by the Cabinet Member for Infrastructure and has community representation from the City Council, local Ward Members, Parish councils (adjoining city), Hereford BID (Business and Improvement District), Local Nature Partnership, NIMTE (New Model in Technology and Engineering) and local Voluntary Groups. It has been running at regular intervals and its purpose is to discuss

¹¹ HAP Emerging Potential Housing Options

https://www.herefordshire.gov.uk/consultations/article/27/hereford_area_plan_hap_and_hereford_transport_package_hap_consultation

the HAP preparation. Notes from the Reference Group meetings can be found on the Council's website¹².

4.7 Consultation Group Outcomes

As a result of discussions with both the Officer Working Group and HAP Reference Group there was agreement on the proposed methodology to assessing sites. Through the stage 1 assessment, it was clear that large tracts of land were identified on the outskirts of the city but there was less land available in the city centre and wider area. As a result of this both groups requested the following tasks to be completed:

- reassessment of sites that had been discounted where availability was unknown with the intent to seek out the landowners. This meant revisiting the 'long list' of sites ruled out in the stage 1 assessment (Emerging potential housing options see appendix 4). Sites with identified constraints were not included.
- identification of sites previously unidentified which could be suitable and including them in the assessment as well as seeking out ownership information through Land Registry and the call for sites process.
- Assessment of the potential of existing employment sites which are rated 'moderate' or 'poor' as set out in the Employment Land Study 2012. Core Strategy Policy E2 sets out the protection afforded to such sites will be less than sites rated 'best' or 'good' and this should not prohibit their redevelopment. Such sites were considered with the assistance of colleagues in Economic Development and Property Services.
- Liaison with internal staff to identify any available public sector land or other land which may be available throughout the city. This resulted in some amenity areas and open space land being identified.

4.8 Identification of additional sites

Of the previously identified sites, there were two which have since been granted planning permission so will no longer be included in this consultation with the remainder being taken forward from stage 1.

4.9 Stage 2 involved gathering of information with specialist services within the Council to identify additional sites. This additional work resulted in the identification of an additional **28 sites**. See appendix 2 for the full list of sites and reason for inclusion/exclusion in stage 2 of the assessment.

4.10 In total 57 sites have been assessed as potential site options for housing.

A total of 5 sites have been assessed as potential site options for the accommodation of employment uses.

5.0 SECTION 5 TECHNICAL INPUT

Each site was assessed against a range of issues and criteria designed to identify potential impacts and identify mitigation measures. Mitigation measures may then feed into policy requirements within the HAP or even additional land use allocations (for example for new open space, highways improvements, etc.). The relationship to the surrounding area and

¹²HAP Reference Group Meeting Minutes

https://www.herefordshire.gov.uk/downloads/download/1877/hereford_area_plan_reference_group_minutes

other potential neighbouring sites is also taken into consideration in this section of the assessment.

5.1 The sites have assessed with the aid of the council's technical experts to inform the site selection process. Comments have been taken into account as part of the site selection process and in some cases their comments have shown that sites cannot be taken forward at this stage and are shaded red on the map to indicate this. The remaining sites are deemed suitable and coloured green, see Figure 2a - 2c.

5.2 Highways

Sites will need to meet satisfactory highways standards for accessibility in terms of pedestrian, cycle and bus. Having an understanding of the proximity of sites to commercial bus routes and the ability to extend transport routes directly into the site will need to be considered further down the line.

5.3 Identifying a suitable access to and from the site has also been assessed. If necessary and where possible potential required highway improvements will be identified. It is recognised that there are capacity issues on the network with congestion along particular routes of the city. Traffic modelling of the impact of will be undertaken to assist in decisions about pressure on the network.

5.4 Landscape

Landscape assessments of site options have been undertaken on external city sites. Landscape and visual sensitivity were determined based on a scoring of High, Moderate and Low. The assessments helped to guide conclusions on the extent of area capable of accommodating new development. With this in mind, this process helped to inform potential capacity of the site to accommodate more development and where possible mitigation measures were included.

5.5 Built conservation and Archaeology

The purpose of this assessment was to determine whether the candidate site would adversely affect the built and below ground heritage. Sites have been identified in Conservations areas, Areas of Archaeological Importance and some are close to listed buildings and their settings. The potential for design, layout, and landscaping to mitigate any potential impacts will be explored when site potential is clearer. Assessments have been carried out by internal officer assessments. Previous comments from Historic England have been incorporated into the information on each site where available. As it becomes clearer which sites have potential to proceed to Stage 3, then the studies mentioned in para 3.4 – 3.7 will inform how these sites can be taken forward.

5.6 Ecology

Where environmental protection designations exist these have been highlighted and referenced in the site assessments. Some are significant enough to prohibit sites being identified.

5.7 The whole of the HAP City area falls within the River Wye SAC/SSSI Impact Risk Zones. This has an ecological bearing as a result of construction and discharges of water and liquid,

including to mains sewer. Therefore it is expected that all foul water must be managed through connection to main sewer network.

5.8 **Open space**

Reference to the Open Space Assessment completed in 2006 is made and the study is still considered robust and relevant in respect of amenity greenspace as little has changed. Further work will be needed to assess the accessibility of green space for each of the sites and the impacts of additional housing on existing open space.

- 5.9 An assessment of whether the candidate site would lead to the loss of any existing space (both formal such as playing pitches and informal green spaces) has been made. Commentary on the proposal to develop open green space is made in the context of the area identified. Any impacts on areas which serve a wider role as green infrastructure are also considered. In each case, assessment will establish whether development would offer opportunities to create new or enhanced green spaces or green infrastructure.

5.10 **Additional considerations**

5.11 **Drainage and flood risk**

The NPPF states that “New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change” (Para 99). This is expanded through Para 100 wherein it states that “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere”.

- 5.12 Furthermore the NPPG states through the guidance for housing and employment sites that physical limitations or problems should be considered through the suitability assessment, including flood risk. Stage one of the site selection methodology excludes sites within the Flood Zone 3. Given that flood risk is a key constraint in Hereford and the importance of ensuring this risk is not exacerbated through further development,
- 5.13 Existing flood risk assessment work have been used in preparing the site options paper and identify issues regarding the development and capacity of sites. For example, there are some brownfield sites within the city which are situated in flood zone 3 but as they are previously developed sites a view has been taken as to their suitability in taking forward. Where surface water flooding has been identified this is included in the site schedule.
- 5.14 Detailed flood modelling is being undertaken and will help inform the ongoing work on identifying sites.

5.15 **Agricultural Land Classification**

Paragraph 112 of the National Planning Policy Framework (NPPF) states that “*Local Planning Authorities should take into account the economic and other benefits of the best and most versatile agricultural land..[and] should seek to use areas of poorer quality land in preference to that of higher quality*”. The National Policy Guidance (NPPG) also offers

further guidance on site housing and employment assessments stating that landscape features should be included within the assessment.

5.16 Sites have been assessed in terms of their agricultural land value to help understand where sites are identified on best and most versatile land. These are categorised as follows based on Natural England classification mapping¹³:

- Grade 1: Excellent
- Grade 2: Very Good
- Grade 3: Good/Moderate
- Grade 4: Poor
- Grade 5: Very Poor
- Urban: Other land primarily in non-agricultural use or in urban use

5.17 The majority of the land around Hereford is Grade 2 agricultural land which is very good quality. However, even though the plan will aim to maximise development on land within the city it is likely that significant amounts of housing and employment land will be required on peripheral greenfield land if housing targets are to be met.

5.18 **Phasing of site development**

The Core Strategy does not set out specific policies to phasing housing sites. However, it makes clear that appropriate and necessary infrastructure is co-ordinated with new development. This is not a matter included within this stage of plan preparation as this can only be done in detail/accuracy once the overall housing allocations have been finalised.

5.19 At this stage views are being sought as to the preference of sites coming forward in the short, medium or long term. See question 3 in the questionnaire. Questionnaire responses will be considered alongside evidence and infrastructure requirements when preparing the sites for the next stage of consultation.

5.20 **Site Capacity Assessment**

The NPPG advises that calculating housing potential should be guided by existing or emerging plans and locally determined policies on densities. In determining the appropriate density that should be applied to a site, regard needs to be had to:

- The need to use land effectively thereby reducing the amount of greenfield lost;
- The characteristics of the surrounding area
- The need to achieve high quality, well designed housing
- The need to actively manage patterns of growth to make the fullest use of public transport, walking and cycling and focus development in the most sustainable locations

5.21 To further refine how the capacity of a site is estimated the gross to net factor approach was used to determine the capacity of each site. The gross to net factor aims to take account of the need to provide supporting facilities on site. For larger sites there is a need to provide significant infrastructure such as schools, community facilities, greenspaces etc. For smaller

¹³ Natural England Agricultural Classifications for West Midlands
<http://publications.naturalengland.org.uk/publication/130044?category=5954148537204736>

sites none is likely to be necessary on the site. The following gross to net ratios are applied as extracted from HELAA:

Site Size	Gross to net ratio
Up to 0.4 hectares	100%
0.4 – 2 hectares	90%
2-10 hectares	75%
Over 10 hectares	50%

5.22 The number of housing sites required will depend on the yields which have been assumed for those sites. The HELAA will have provided a starting point for assessing the expected yield of each site. However these may have been adjusted either upwards or downwards in the light of the more detailed impact testing and assessment carried out during the Stage 2 assessments.

5.23 Core Strategy policies H3 on housing mix sets out the approach to the range and mix of sizes of dwellings on sites accommodating 50 or more dwellings. Policy H3 will have an influence on housing numbers and affects the larger housing allocations and developments. Housing mix is also a matter for detail at the time of submission of a planning application. The latest Local Housing Market Assessment will provide evidence of the need for an appropriate mix and range of housing types and sizes.

5.24 Density

A density has been applied to the site area to estimate the potential capacity of the site. There is currently no national guidance on appropriate housing densities nor are there any minimum or maximum density standards set within the development plan. The density of new development is expressed as the number of dwellings per hectare of land (dph). The density is multiplied by the net site area to provide an estimate of the number of dwellings achievable on each site. The range of densities applied here are:

- 70 or more dwellings per hectare on sites within the city centre area as recent residential permissions reflect these densities and in some cases are higher.
- 50 dwellings per hectare for sites within the urban area with good public transport accessibility levels and access to existing infrastructure and services.
- 30 dwellings per hectare for sites on the fringes or adjacent to the urban area. These sites have lower levels of public transport accessibility and are less well served by existing infrastructure and services and therefore a lower level of housing is more appropriate.

5.25 As the sites continue to be assessed and further evidence is prepared, a final capacity for each one will be set out.

5.26 Minimum site size

A minimum site size threshold of **0.4ha or a smaller site capable of accommodating 10 or more dwellings** has been adopted for the purpose of this assessment. Dependant on the

site configuration, sites of 0.4 ha in size will typically accommodate over 10 dwellings. Sites below this size that can accommodate 10 or more dwellings will also be included as potential sites.

5.27 Sites smaller than 0.4ha or not capable of accommodating at least 10 dwellings will continue to come forward as windfall sites (i.e. sites which become available for development but are not allocated in the HAP).

5.28 The HAP Issues and Options consultation¹⁴ included a question about the acceptability of the HAP identifying housing sites for 10 or more dwellings or sites of 0.4 hectares and greater. The majority (55%) were supportive of this approach.

5.29 **Windfall**

A windfall annual target of 25 dwellings per annum is the proposed amount for Hereford based on the strong record of delivery. This is a proportion of the 100 dwellings windfall allowance across the county as set out in the Core Strategy.

5.30 For the time period (2018-2031) or over the next 12 years anticipated windfall amounts would be expected to be 300 dwellings for Hereford city. Any planning applications that are granted after the HAP is adopted, on sites not allocated specifically for housing will be classed as windfall.

5.31 **Source of Sites**

The sites which are within this consultation have been compiled from a number of sources;

- HELAA
- Employment Land Study.
- Former development plan allocation.
- Redevelopment areas such as the Edgar Street Grid Area;
- Council asset review – land or buildings which the Council considers are surplus to requirements.
- Property Gazetteer
- Speculation on sites where availability is unknown but yet to be determined

5.32 As part of the HAP Housing and Employment Options Consultation, the Council have issued a further 'Call for sites' specifically for **brownfield** sites. This is to ensure every opportunity for sites to be considered has taken place. Please see www.herefordshire.gov.uk/herefordareaplan

5.33 **Summary of Site Outcomes**

Appendix 3 sets out the capacity estimate for the 57 housing sites assessed whilst Appendix 4 contains a summary of the site assessments for each site. A more detailed assessment of the sites is set out in a separate document entitled 'Technical Site Assessment of HAP Options'

¹⁴ HAP Issues and Options Consultation Statement and Results
https://www.herefordshire.gov.uk/downloads/file/11590/issues_and_options_consultation_statement_and_results_-_hereford_area_plan

- 20 sites were considered to be unsuitable to move forward to Stage 3 and have been discounted as having 0 capacity
- 37 sites are considered to have potential to move forward into the Stage 3 assessment and will be considered alongside consultation responses, SA and available evidence.
- The housing capacity of sites with potential amounts to 3647.
- A deduction on this capacity must be made for the Urban Village strategic site. At April 2017, there were 191 completions in this area with commitments for 161 new dwellings this is a total of 352. When deducted from the overall 800 dwellings identified for the urban village, this leaves 448 homes left to be committed and delivered. Therefore out of the total HAP Site Options capacity of 3647; deduct 448 =3199. This would indicate capacity of approximately **3200** exists on all the Site Options.

5.34 However, site availability must be established for some sites before moving forward into Stage 3 of the assessment process.

5.35 Out of the 5 employment sites assessed

- ES1 is a large site within the road corridor and has some uncertainty about site access which is yet to be assessed after the preferred alignment is established.
- ES3 has been assessed as potential housing site (Hol13, Stm05 & Stm17) and similar to this assessment, only part of the site has potential. However, given the prominence of this site in the landscape, employment buildings would not be acceptable even in the northern areas of this site.
- ES4 has also been assessed as potential housing site (Stm01, Hol12a & Hol12b) and similar to this assessment, only part of the site has potential. However, given the prominence of this site in the landscape employment buildings would have limited scope to the northern areas of this site.
- ES5 has also been assessed as a potential housing site (Bur23 & Bur31). It is also proposed employment site within the Holmer and Shelwick emerging NDP. The site is within the final phase of the road corridor where no road alignment has yet been identified. This site may have potential in the longer term but this is dependent on road capacity and suitable accessibility. It should not be considered as an Option Site at this stage.
- ES6 is identified as potential new employment land adjacent to the Rotherwas Enterprise Zone.

5.36 See Figure 2c for a map of the employment sites.

6.0 SECTION 6 NEXT STEPS

Ultimately the outcome of the consultation and ongoing evidence base development will result in the identification of a set of housing and employment land allocations for inclusion within the HAP.

6.1 Following the conclusion of the Site Options consultation, Stage 3 of the assessment process begins. The Council will review responses to assess whether there are any reasons

to amend the categorisation of any sites which had a red or green rating i.e. new evidence which indicates the sites should be re-categorised.

- 6.2 Sites where there is no new evidence to suggest previously assumed land ownership or physical constraints can be overcome will be removed from the list of potential sites. Sites which were previously classified within the assessment as red due to conflicts with national planning policy and designations which would normally rule out development will be removed from the list unless there is evidence to suggest the previous assumptions were incorrect. In such cases the Council will consider the points raised and may consult with relevant agencies before making a final decision on whether to carry those sites forward to the next stage or remove them from the list of potential sites.
- 6.3 It is important that the site assessment process tests the impacts and suitability of sites on both an individual basis and a cumulative basis. This means initial testing will look at individual site impacts but once an initial package of potential sites has been selected a series of cumulative impact tests will be carried out. These tests will relate to highways capacity, flood risk, and impacts on the River Wye SSSI and SAC. The results will help determine the necessary mitigation measures required, and the infrastructure required to support development but will also allow for adjustment to site selections if impacts cannot be addressed or alternative site package combinations would result in fewer cumulative impacts.
- 6.4 New sites submitted through the 'call for sites' will be subjected to the normal SHLAA tests of suitability and availability. Initial SHLAA assessments of these new sites including projected site yields will be assessed. Should any sites have been submitted for other i.e. non-residential uses during the Options consultation they will also be subject to the SHLAA tests but will also be assessed for their suitability for the proposed use. In the case of any site suggested for employment use the Council will apply criteria used within its last Employment Land Study for their assessment as set out earlier.
- 6.5 Further representations on sites (including those relating to schools, environmental health and drainage) will be necessary to make a more informed decision on sites as further progress is made. Any further requirements arising could be reflected in detailed policy wording. In some cases if additional housing indicates the need for a new school classroom then it will be part of an allocation policy. Where any further expert comments from external sources have been made, these will be included in the site assessments once received, prior to making final decisions on which sites to take forward to include within a Draft Plan/Preferred Options document.
- 6.6 In considering sites for inclusion they will be grouped as follows:
1. First priority to the re-use of deliverable and developable previously developed land and buildings;
 2. Second priority to mixed greenfield / brownfield sites
 3. Third priority to greenfield sites within Hereford;
 4. Fourth priority to local green spaces in the city
 5. Fifth priority to larger urban extensions
 6. Avoidance of sites in the road corridor where alignment is unknown.

6.7 A suggested timetable for preparing the HAP is set out below. The table below sets out the main stages of production:

Table 2

Proposed HAP timetable

Public consultation on site options and call for sites	Summer 2018
Consultation upon draft plan/preferred options	Winter 2018
Council approval of submission document	Winter/Spring 2019
Pre-submission publication	Spring 2019
Submission	Summer 2019
Public examination	Autumn/Winter 2019/20
Adoption	Spring 2020