

WEST MIDLANDS REGIONAL SPATIAL STRATEGY

PHASE TWO REVISION

PROGRAMME AREA RESPONSIBILITY: ENVIRONMENT AND STRATEGIC HOUSING

CABINET

29 MAY 2008

Wards Affected

County wide.

Purpose

To determine a response to the Phase Two Revision of the West Midlands Regional Spatial Strategy (RSS). A full copy of the Phase Two Revision document is available in the Members room for Members attention.

Key Decision

This is a key decision because it is significant in terms of its effect on communities living or working in Herefordshire in an area comprising one or more wards. It was included in the Forward Plan.

Recommendation

THAT the Council submits representations to the Panel Secretary generally supporting the Phase Two Revision subject to:

- 1. The Spatial Strategy should include further recognition of the infrastructure requirements at Hereford if growth is to be achieved; the peripheral expansion of market towns, and their service centre role for their rural hinterlands; and the need to plan for the renaissance of the region's remoter rural areas in a way which sustains their social, economic and environmental character;**
- 2. Policy CF2 should be amended to recognise that growth may only be capable of being accommodated in some settlements of significant development if infrastructure constraints are removed. The recognition in para. 6.21 in respect of meeting housing needs in smaller settlements is welcomed;**
- 3. In respect of policy CF3:**
 - a) the total provision of 16,600 dwellings for Herefordshire be supported;**

- b) the identification of Hereford as a settlement of significant development be supported as reflecting the Council's Growth Point partnership with Government for the delivery of housing growth;
 - c) the provision for Hereford (8,300 dwellings) be expressed as a maxima, recognising that at present the extent to which Hereford can accommodate new development is limited and that the practical achievement of these levels of growth will be dependent on suitable transport and other infrastructure provision, as well as other factors;
 - d) following consideration of the distribution of growth within the County in the Local Development Framework Core Strategy and the Hereford Area Action Plan, dwellings which cannot be accommodated within or adjacent to Hereford be directed to the rest of the County in accordance with the principles in policy CF2;
4. The affordable housing targets in policy CF7 be re-assessed in the light of the emerging Housing Market Assessment for the West Housing Market Area;
 5. Policy CF10 be supported and further recognise that in rural areas there are also considerations such as the relatively high proportion of small sites in the overall housing supply;
 6. The comparison retail floorspace requirements set out in policy PA12A be supported, with the retail assessment work being undertaken as part of the Local Development Framework offering the opportunity to refine the Phase Two Revision figures at Examination if necessary to ensure suitable provision is made for Hereford city centre;
 7. The office development requirement for Hereford in policy PA13A be supported;
 8. The revisions to the waste policies be supported, subject to clarification of the implications of the existing joint arrangements for the principle that each waste planning authority should plan to manage an equivalent tonnage of waste arising within their boundary; and
 9. The continuing recognition of the need to implement the package of measures identified in the Hereford Transport Review be supported, so as to allow Hereford to fulfill its role as a Settlement of Significant Development.

Reasons

To ensure that the Council's views on the Phase Two Revision are considered.

Considerations

Introduction

1. The current version of the West Midlands Regional Spatial Strategy (RSS) was issued by Government in 2004. An immediate phased review was commenced. The first phase – dealing with the Black Country – is complete. The second phase, the subject of this report, has now reached an advanced stage. It deals with housing, employment, the role of centres, waste and some aspects of transport. The third and final phase began in November 2007 and covers rural services, gypsy and traveller sites, culture, minerals and environment policies.
2. In preparing the phase two revision, the West Midlands Regional Assembly (WMRA) has worked closely with regional stakeholders. Strategic planning authorities in the region, including Herefordshire Council, prepared and submitted advice to the Assembly in 2006. Consultation was then undertaken on spatial options. These were considered by Cabinet in February 2007. A preferred option was approved by the Assembly's Regional Planning Partnership in October, and submitted to the Secretary of State in December.
3. A formal public consultation on the revision was launched on 7 January 2008. The current closing date of 30 June 2008 is likely to be extended (see below).
4. The next stage is an Examination in Public, arranged by the Secretary of State and held before an independent Panel. The Panel will prepare a Report for consideration by the Secretary of State, who will publish and consult on proposed changes before finalising the revised RSS.
5. Throughout the process of drawing up the revision, Government has been concerned that more houses need to be built if problems of affordability are to be addressed. The Assembly has worked with partners, including local planning authorities, to increase its proposals for housing provision throughout the region. Although significant increases in housing development are proposed across the region, the submitted revision does not meet Government aspirations in full.
6. Government has responded by commissioning a study to look at options delivering higher housing numbers. In order to allow adequate time for consultees to consider the study when it becomes available in October, the consultation period on the revision is proposed to be extended to December. On this basis the Examination will not commence until Spring 2009.
7. A further report to Cabinet will be made on the Government study when this is available. However, the study will not alter the content of the submitted document. It is this which has been published for consultation, and which will be before the Panel at the independent examination. Moreover, the submitted

document forms in effect the starting point for the Council's Local Development Framework, and to establish a basis for the Core Strategy spatial options it is essential to define the Council's position on the RSS document.

8. Against this background, this report goes on to advise on a response to each of the policy areas in the phase two revision as it stands.

Sustainable region (chapter 2 of the RSS)

9. This chapter of the revision sets out four new crosscutting policies on climate change, sustainable communities, sustainable construction and improving air quality for sensitive ecosystems.

Response

10. The introduction of these policies reflects the increased importance attached to these issues since the RSS was approved in 2004. Several aspects are worth highlighting:
 - The potential impact of housing and other development on nature conservation sites of European and national importance in the region. Diffuse air pollution is highlighted as a particular area of concern, affecting several sites in and adjacent to Herefordshire: Downton Gorge; Wye Valley Woodlands; and Wye Valley and Forest of Dean bat sites. Other sites such as the River Wye are at risk from other factors. There will be a need to continue to assess the impacts of growth proposals on these sensitive locations as the Local Development Framework is prepared;
 - A proposed requirement that medium and larger scale developments meet at least 10% of their energy requirement on site;
 - The pressure that new housebuilding is likely to create on water resources supplying the region and on sewage treatment infrastructure.
11. In brief, in principle these policies are very much to be supported. Their overall effect is to put in place safeguards against which the scale of proposed new development can be assessed. The policies effectively delegate much of this work to local planning authorities in their Local Development Frameworks, and this is a measure of the difficulty of determining a regional level policy to what is essentially a local issue. Nonetheless the policies should help ensure a consistent local response.

Spatial Strategy (chapter 3)

12. A number of adjustments have been made to the wording of the RSS spatial strategy, in order in part to reflect the levels of development being contemplated. For instance, the green belt objective now accepts that such land may be used in certain defined circumstances where necessary to deliver housing proposals. At Coventry the approach now allows for peripheral expansion of the conurbation onto greenfield land or in exceptional circumstances onto green belt, in order to meet housing needs.

13. Outside the metropolitan areas, new development is to be focused in and adjacent to towns capable of growth, but without attracting investment or migration from the conurbation. Hereford is listed as one of these ten settlements, designated as 'Settlements of Significant Development'. Effectively this is to replace the 'sub-regional foci' approach in the approved RSS (where Hereford is one of five). Provision for housing is to be concentrated in these settlements.
14. Peripheral development of other settlements may also be considered, with a key role recognised for market towns and larger villages. On transport, reference is now made to resolving existing infrastructure problems and assisting economic objectives. Overall the Strategy recognises that the growth agenda will require significant concerted investment in existing and new infrastructure.
15. A revised text for the 'rural renaissance' challenge is identified which emphasises the economic and social potential of rural areas whilst embracing the challenges of access and climate change.
16. Greater emphasis is placed on the need to achieve the spatial strategy through working with partners and in alignment with both the Regional Housing Strategy and the West Midlands Economic Strategy (WMES). As far as housing is concerned, the revision endorses the four sub-regional housing market areas. Herefordshire sits in the West area, with Shropshire (excluding Telford & Wrekin). For economic development, the revision addresses the spatial implications of the WMES. In the context of the recommendations of the sub-national review for a single regional strategy to be developed by the Regional Development Agency, these steps towards an integrated approach are to be welcomed.
17. At a sub-regional level, the implications of the strategy are set out more clearly than hitherto in a separate section. The implications for Herefordshire are:
 - the role of Hereford as a settlement of significant development, where the aim is primarily aimed at meeting the economic and social needs of the area rather than attracting out-migration from the conurbation;
 - a recognition that the extent to which Hereford can accommodate new development is limited, with an identified priority for the city being to ensure necessary transport infrastructure to deliver levels of planned economic and housing growth, support regeneration and protect historic heritage;
 - outside of Hereford, further development within key market towns acting as strategic locations for balanced housing and employment growth;
 - within the context of the WMES, economic measures to develop the tourist potential of the market towns and Areas of Outstanding Natural Beauty, bringing forward new, high quality employment sites/premises in sustainable locations, and revitalise industrial estates and town centres.

Response

18. Clearly the Strategy as now set out puts more emphasis on the achievement of growth. Proposals to use green belt, the identification of ten Settlements of Significant Development and the contemplation of peripheral development at other locations are notable amendments to the approach approved in 2004.
19. The designation of Hereford as a Settlement of Significant Development is a logical extension of the current 'sub-regional foci' role and also reflects the Council's support for the City's role as a New Growth Point. The emphasis on the need to address transport matters is very much to be welcomed although other infrastructure issues will also need to be considered, such as water and sewerage.
20. For the market towns, the allowance for them to grow in a balanced way is also to be supported. A clearer recognition should be made of the likely need to accommodate growth through peripheral expansion in these locations. Reference could also be considered to the role that market towns play in providing a certain level of service for their rural hinterlands.
21. In the rural areas, whilst larger villages do have a role to play, there is a need to recognize that many parts of rural Herefordshire have an open and diffuse settlement structure. Here, focusing growth to larger settlements can run against supporting communities and achieving sustainability at a local level. The existing RSS policy on this issue already requires planning authorities to take into account the extent to which new development may help the provision of local services, whilst supporting new and innovative forms of service delivery. There are also helpful statements on the role of market towns and villages. As the phase two and three revisions of the RSS proceed, it will be important to emphasise the point that the Strategy needs to provide for economic and social needs and requirements in the remoter rural areas, where larger settlements are few and far between, as well as providing for growth in larger towns and cities.

Housing (Communities for the Future, chapter 6)

22. This chapter sets out the Assembly's response to the Government's goal to increase levels of new housebuilding. The emphasis on urban renaissance – the concentration of housing growth within the conurbation, where much demand arises - remains. At the same time, growth is directed to the settlements of significant development as well as to other settlements, market towns and rural areas. Growth within and adjacent to market towns is again recognised. There is an explicit acceptance that whilst sustainability considerations will lead to growth in the rural areas being focused in the market towns and larger rural settlements where services exist, small scale housing provision may also be considered in smaller settlements where this can be shown to contribute to the regeneration of the rural economy and the sustaining of local communities by meeting proven housing needs (policy CF2).

23. The level and distribution of housing development, set out in policy CF3, is such that the ratio of development between the metropolitan and other areas is expected to be 1:1.2 – for every ten dwellings built in the conurbation, 12 will be built outside. This compares with the approved strategy which aims to achieve a balance of 1:0.7 – where for every ten dwellings built in the conurbation, only seven are constructed in the rest of the region. This demonstrates the extent to which the overall strategy – based on urban renaissance achieved by enabling the conurbations to meet their own generated needs - has been affected by the pressure to accommodate increased levels of growth and the reaching of capacity limits in the conurbation. Provision overall falls short of that suggested by the 2004 based household projections, with a shortfall of around 16,400 dwellings (365,600 in the phase two revision, compared to 382,000 in the projections).
24. For Herefordshire, 16,600 dwellings are proposed 2006-2026 (830 per annum), with half of this growth directed to Hereford.
25. Policy CF5 sets a target for development on previously developed land at 70% for the region. This is down from a target of 76% in approved RSS. For areas outside the conurbation, the target is now to be 60% (down from 65%). These more modest targets reflect the need to develop greenfield land to deliver growth.
26. Policy CF7 sets a minima target of 700 units of affordable housing per annum for the West Housing Market Area. The policy highlights the setting of lower site thresholds in rural areas and small rural settlements; the option of allocating sites as 100% affordable; the use of the rural exception approach, and the use of local authority land resources.
27. Policy CF8 emphasises the need to achieve a balanced mix of development, which allows for more family friendly housing and provides for more housing for the elderly such as lifetime homes and extra care housing.
28. Finally, policy CF10 identifies the contribution that windfall sites make to regional housing land supply – currently over half of all completions are on such sites. Current Government policy is that windfalls on previously developed land should not be taken into account when assessing future provision, unless there is robust evidence of genuine local circumstances that prevent specific sites being identified. Government appears to assume that windfalls on greenfield land will not occur in any significant numbers. Against this, the phase two revision argues that in the circumstances of the West Midlands, where economic re-structuring is underway, land falling out of employment use can - where it is not required for its original purpose - make a significant contribution to housing land supply. In doing so, sites can be brought back into use quickly and the need to use peripheral greenfield land minimised. The policy thus proposes that a windfall allowance is made by local authorities in determining their housing provision, where justified by evidence.

Response

29. As a starting point, policy CF2 should include explicit reference to the need to improve infrastructure if growth is to be accommodated. The recognition of the role of market towns, larger villages and smaller rural settlements is to be welcomed.
30. The implications of the levels and distribution of housing development proposed in policy CF3 for Herefordshire can be best illustrated by comparison with historic rates of provision and the equivalent UDP position (see table).

	Dwellings completed (per annum, 1996-2007)	Average UDP rate (dwellings per annum, gross)	Phase 2 revision (dwellings per annum, net)	UDP/phase 2 % difference	% phase 2 provision already identified*
Herefordshire	816	813	830	+2%	30%
Of which Hereford	207	270	415	+54%	25%
Rest of County	609	562	415	-26%	35%

* completions since April 2006, planning permissions and UDP allocated sites

31. For the County overall, the table shows that proposed rates of development are broadly comparable with both those already being achieved and those postulated in the UDP. These rates are similar to those endorsed by the Council during the earlier spatial options consultation, and are to be supported.
32. Concerns arise in the proposed distribution of this new development between Hereford and the rest of the County. The phase two revision introduces a new requirement that half of new housing be directed to Hereford. In effect this equates to a significant increase in rates of development at Hereford – up 54% on UDP rates and 50% on what has been achieved in the recent past. This will undoubtedly require both significant greenfield releases and the solution of infrastructure constraints. Limits relating to transport and water provision are presently being investigated as part of the development of the Local Development Framework's evidence base, and work is also underway to assess the likely availability of housing land. It is too early to say whether these levels of development will in practice be achievable, having regard to infrastructure; levels of market demand; availability of suitable sites; and capacity in the construction industry.
33. Outside Hereford, the position is reversed. Rates of development are proposed to fall. Past completion levels and UDP rates of development are both significantly higher than those now being mooted. The issue that thus arises is whether sufficient provision is now being made outwith Hereford, bearing in mind the need to provide for the growth of the market towns and in sustainable settlements in the wider rural areas.

34. In considering these opposing concerns, it is important to remember that the Council has adopted a position of welcoming growth at Hereford in its participation in the New Growth Point programme – and the phase two revision reflects this. However, Growth Point aspirations are subject to testing and confirmation through the RSS process. The Council has also previously confirmed to the Regional Assembly (in its response on the spatial options consultation) that there are infrastructure limits at Hereford. Significant development at Hereford will require these to be resolved, and indeed may help provide the means to do so via the new Community Infrastructure Levy (if confirmed). The Council has also expressed the view that the County's market towns should also be considered to accommodate increased levels of growth.
35. A possible approach to resolve these dilemmas would be to introduce an element of flexibility in the distribution within Herefordshire. This would first recognize that as much growth as possible should be sought at Hereford. Necessary infrastructure provision would be made to achieve a maxima of 8,300 dwellings over the period. The balance would then fall to be found outwith Hereford. This would be a minima of 8,300 dwellings, plus any residual which could not be located at Hereford. The RSS total for the County would remain unchanged.
36. This would allow a balanced pattern of development to be determined through the Council's own Local Development Framework, whilst protecting overall provision and the priority given to Hereford as a settlement of significant development. The Council's approach to the preparation of its Local Development Framework – the preparation of the Core Strategy, then the Hereford Area Action Plan, followed by a final Development Plan Document dealing with the market towns and the rural areas – is very much in line with such a step by step process. It would also allow the implications of the forthcoming phase three revision to be addressed at the local level – notably how development might be used to support rural services in the market towns and larger villages. In the interim, pending completion of different elements of the Local Development Framework, UDP policies will provide policy coverage. It is recommended that appropriate representations are made on this basis.
37. Turning to policy CF5, the proposed revised target for development on previously developed land outside the conurbation, 60%, is the same as the national target in PPS3. Last year 71% of housing completions in the County were on previously developed land (to March 2007) – the highest figure since data was collected in 1996. Some 77% of outstanding planning permissions at March 2007 were located on previously developed land. For the future, such 'brownfield' development can be expected to continue to occur although current rates are unlikely to be sustained as a result both of greenfield UDP sites coming on stream and further greenfield releases which will be necessary to deliver housing growth aspirations. The policy as written will not create undue difficulties for the County.

38. In terms of affordable housing, policy CF7 sets an indicative annual minima of 700 affordable units for the West Housing Market Area, of which Herefordshire forms part. However the emerging Housing Market Assessment for the Market Area points to a much higher level of need, a reflection of the affordability gap in the area and relatively low levels of social housing supply. Clearly there is a need to establish workable policies which do not in themselves act to constrain development and so restrain supply. However the evidence would appear to support measures such as increased targets/requirements, or reduced thresholds. This can be pursued in the Council's own emerging Core Strategy, within the context of appropriate regional targets. Policy CF7 is expressed as a minima, but it is recommended that representations be made that the affordable housing targets in policy CF7 be re-assessed in the light of the emerging Housing Market Assessment. Some 120 affordable housing units were achieved in Herefordshire in 2006/7, an increase over the average 97 dwellings per annum achieved since 1996.
39. The line taken in policy CF10 towards so called 'windfalls' – housing units arising on previously unidentified sites – is very much supported. The national policy towards windfalls is difficult to sustain in Herefordshire where a significant proportion of the housing land supply derives from this source. The UDP for instance assumes that over 2,800 dwellings will arise from windfalls in the period 2001- 2010 – 23% of the total Plan housing provision. Clearly it is important that a reasonable and evidenced allowance is made for sites from this source, and the regional arguments in policy CF10 are welcomed. However the case made is expressed very much in terms of economic changes and restructuring in manufacturing. It would be helpful if a rural dimension could be added – referring for instance to the relative emphasis on small sites which typically characterizes housing land supply in areas such as Herefordshire.

Employment (Prosperity for All, chapter 7)

40. This chapter and the partial revisions to it cover both general employment matters and town centres. The text has been revised in tandem with the revision by AWM of the Regional Economic Strategy, with which it dovetails.
41. The overall approach is to ensure sustainable economic growth as appropriate across the region, including the settlements of significant development such as Hereford, ensuring housing and employment growth proceed together. The emphasis on Regeneration Zones, including the rural zone, remains as in the approved RSS.
42. The various requirements for employment, retail and office uses for the County are summarized in the table below.

Use/location	RSS proposals
Employment land provision for Herefordshire (Policy PA6A)	Rolling five year reservoir of 37 hectares readily available land, with an indicative longer term requirement of 111 hectares.

Comparison retail, within Hereford city centre (Policy PA12A)	An additional 40,000 m ² for the period 2006-2021, with an indicative requirement of a further 20,000 m ² for the period 2021-2026 (gross figures).
Offices, Hereford city centre or edge of centre (Policy PA13A)	A 'lower limit' of 45,000 m ² gross for the period 2006-2026.

Response

Employment land

43. The County has some 21 hectares of readily available employment land, to set against the 37 hectares required by the draft revision. This 'rolling reservoir' approach is new and will need careful handling in the Local Development Framework to ensure that land of appropriate quantity and quality is readily available in desired locations as it is expected to be required. It may be necessary to phase land release so as to synchronise with housing growth.
44. Overall the policy appears to suggest a provision of 148 hectares for the County over the twenty year RSS period (ie five year reservoir plus the longer term figure). This compares with a provision of 100 hectares in the UDP over fifteen years (equivalent to 133 hectares over a 20 year period). The UDP assumes that land for housing and employment would be needed on a 4:1 ratio, and applying this rule of thumb to the RSS housing provision suggests an overall requirement of 138 hectares. Taking into account the fact that the forecasting of employment land needs is an inexact science, particularly over the timescales now being considered, the RSS requirements overall appear reasonable and should be supported. Also to be welcomed is the emphasis in the policy on the fact that the longer term figures are indicative and are subject to testing and possible revision as part of Core Strategies. As part of the Council's work on the Local Development Framework, an employment land review is currently under way.

Retail

45. The retail proposals, for an additional 40,000 square metres of gross comparison shopping floorspace in Hereford city centre up to 2021 and further indicative provision beyond that, are also supported. These levels may be compared with the balance of the UDP provision - estimated by the Inspector to be of the order of 15-21,000 sq m net for the period up to 2011. Current and emerging proposals on Edgar Street Grid are likely to account for this and may significantly take up the RSS provision to 2021 (for instance, the masterplan provides for 33,000 sq m of retail and leisure - subject to confirmation as the development proceeds). This would still allow further retail provision within the rest of the city centre, ensuring that opportunities were available for new retail schemes to come forward.
46. A retail study has been commissioned by the Council as part of the preparation of the Local Development Framework. The Council's emerging

study is taking the regional work to date into account. However, this in itself might lead to the need to refine the draft RSS figures. Fortunately the opportunity exists to deal with any significant variations at the Examination stage. In any event, the phase two revision already accepts that whilst the floorspace figures should not normally be exceeded, it will be for local authorities to review them in the context of Core Strategy preparation, a process which might lead to some local variations. This flexibility is sensible and should be supported.

47. In respect of the provision between 2021 and 2026, this is rightly seen as indicative and is subject to revision through future RSS reviews. This recognises that there are considerable uncertainties in projecting future comparison retail requirements so far into the future.

Offices

48. Office provision in the County has been relatively modest to date, with recent rates suggesting around 4,500 sq m have been completed in the last five years. This has tended to be on the basis of bespoke provision to meet the needs of existing/expanding businesses rather than speculative.
49. The phase two revision effectively suggests a doubling of this rate. This reflects the housing growth proposed and the need to provide for associated employment.
50. The RSS directs this provision to be planned for in or on the edge of Hereford city centre. This reflects national policy which identifies offices as a town centre use, with new development directed first to in-centre locations before other locations are considered. Emerging national and regional policies both recognise that market demand and other factors will influence office location, and the revision accepts that an element of out-of-centre development will continue to be required. Emerging proposals within the Edgar Street Grid will create capacity opportunities in and around central Hereford.

Waste (Quality of the Environment, chapter 8)

51. When approved, the waste policies in the phase two revision will form the Regional Waste Strategy. An important principle is that each waste planning authority should allocate enough land through their LDF to manage an equivalent tonnage of waste to that arising from all waste streams within its boundary. Reflecting the more stringent targets and challenges in the Waste Strategy for England 2007, the phase two revision sets a series of targets for waste management and diversion from landfill. An assessment is made of the 'treatment gap' between available facilities and tonnages of waste arising. This is to be met by making provision through LDFs for a pattern of sites and areas suitable for new or enhanced waste management facilities in, or in close proximity to, a range of settlements including Hereford. The phase two revision recognises that the allocation of specific waste streams or technologies to particular locations would stifle the opportunity for innovation, so identified sites should be capable of accommodating a variety of technologies and size of facility.

Response

52. The targets set out in the phase two revision will need to be further considered in the context of both the emerging Local Development Framework and the joint contractual arrangements. The latter has obvious implications for the principle of planning for an equivalent tonnage of waste arising in each waste planning authority boundary, which requires clarification as the process continues. The targets will form the background for local waste policies and necessary waste management facilities to deliver the strategy. The locational preferences for new facilities (ie in or close to Hereford) are sensible, as is the envisaged range of sites which includes industrial land and other uses compatible with waste management operations. The principle that site allocations should not be specific to either particular technologies or waste streams is fully supported.

Transport (Transport and accessibility, chapter 9)

53. This chapter sets out the Regional Transport Strategy, setting a context for Local Transport Plans. The chapter has been partially revised, including an update to policy T12, dealing with priorities for transport investment. This policy has been amended to reflect the implications of housing and employment growth.
54. A major transport challenge is balancing the needs of new housing and the economy against increasing levels of congestion. Managing the increasing demand for travel will require a package of measures, including reducing the need to travel, travel awareness, and park and ride. The revision accepts that there will continue to be a need for targeted improvements to the strategic transport network, particularly where they affect Settlements of Significant Development.
55. In this respect, the revision continues to recognise that the road and rail networks in the corridor between Shrewsbury, Hereford and Wales provide strategic links. They are to be managed and developed to balance environmental protection with regeneration and linking areas of opportunity. For Hereford, the revision continues to recognize the problems of congestion and refers to the proposals in the local multi modal study (i.e. the Hereford Transport Review) designed to relieve this and accommodate development and regeneration, thereby allowing Hereford to fulfil its role as a Settlement of Significant Development.
56. Where significant development is proposed in policy CF2, necessary highway and other infrastructure will be needed to access sites and mitigate transport impacts.
57. Policy T12 deals with priorities for investment. The policy identifies the improvement of the transport networks in Settlements of Significant Development (including Hereford) as one sub-regional priority for investment outside the conurbation, in order to support their growth.

Response

58. The recognition of the need for transport infrastructure to be provided at Hereford to deliver the level of planned economic and housing growth has already been noted and welcomed in this report (see section on Spatial Strategy). In the Communities for the Future section dealing with housing development, a precautionary position is recommended that is designed to provide a fall back in the event that growth targets at Hereford cannot be fully met. It is important that adopting this position is not interpreted as signaling a weakening or withdrawal of support for transport infrastructure investment at Hereford. The Hereford Transport Review confirmed that as part of a package of measures an Outer Distributor Road (ODR) will be required in the period to 2031. This position is recorded in the Local Transport Plan where the significant contribution of the ODR to reductions in congestion is set out. In this respect, work is underway as part of the development of the Local Development Framework to assess the transport implications of the levels of growth proposed. Transportation work for the UDP indicated that Hereford's transport capacity was such that levels of growth on greenfield land had to be restricted. The indications are that in terms of accommodating further growth, improvements to transport infrastructure is an essential pre-condition.

Conclusions

59. The phase two revision has been developed in a spirit of partnership by the Regional Assembly, working with the local authorities at both officer and member level and with other stakeholders across the region. As a result, it has a wide ownership. The revision stands as a comprehensive and coherent response to the challenges facing the spatial development of the region to 2026. Accommodating increased levels of housing growth has been achieved within the broad scope of the overall strategy, even if the balance of development between the urban and other areas is not entirely as originally envisaged. The revision has been able to consider and plan for the consequences of that growth for other policy areas, such as employment, waste, and transport. It is appropriate that overall the Council records its broad support for the phase two revision.
60. For the County, as for all other areas in the region, there are significant challenges ahead if the levels of growth now being envisaged are to be met without compromising valued assets such as landscape or protected features such as European sites. The main issue identified in this report is with the scale of development proposed for Hereford, both in its own terms and relative to the rest of the County. The recommended measure of flexibility which is to be sought in this regard will allow an appropriate distribution to be determined locally. This will ensure overall levels of growth, whilst facilitating an appropriate infrastructure response to allow Hereford to fulfil its regional role as a Settlement of Significant Development and the Council's Growth Point aspirations.

Financial implications

No direct financial implications.

Risk Management

The principal risk is with the levels of housing and other allied growth proposed which is to be managed through continuing engagement with the RSS process, including the independent Examination, taking into account the emerging evidence base being assembled as part of the Local Development Framework.

Alternative Options

Not to respond to the consultation.

Consultees

Edgar Street Grid Company.

Background Papers

West Midlands Regional Assembly, West Midlands Regional Spatial Strategy, Phase Two Revision – Draft, Preferred Option December 2007.