



Appendix 3 Recommendations made by Environment and Sustainability Scrutiny Committee, January – December 2025

Monday 20 January 2025					
River Lugg Water Quality					
Rec. No.	Recommendation	Date Sent	Due Date	Recd Date	Response
1	Engage directly with Natural England and the Environment Agency to achieve the lifting of the housing development moratorium as soon as possible.	Tue 28-Jan-25	Thu 27-Mar-25	Fri 4-Jul-25	Partially agreed. The Council will take advice from its legal team in regard to any identified risk in respect of removing the Nutrient Neutrality requirement within the Lugg catchment. If positively advised by Legal the Council will seek a view from Natural England.
2	Ask for early consultation with Herefordshire Council and the Nutrient Management Board on the specific Diffuse Water Pollution Plan, for the Lugg and its tributaries, the Arrow and the Frome.	Tue 28-Jan-25	Thu 27-Mar-25	Fri 4-Jul-25	Agreed. This is already underway. The Council has a meeting diarised with the Environment Agency the author of the Diffuse Water Pollution Plan, to be attended by Welsh government and Defra to request the DWPP is shared with consultants responsible for drafting the catchment wide Nutrient Management Plan.
3	Engage with Government to ensure adequate funding for the actions in the Diffuse Water Pollution Plan.	Tue 28-Jan-25	Thu 27-Mar-25	Fri 4-Jul-25	Partially agreed. It is outside of the scope of the work of the Council to secure funding for the delivery of the actions included within the DWPP as this lies with the Environment Agency and Defra, however the Council can advocate via the Nutrient Management Board, Phosphate Commission and Wye Catchment Partnership to ensure funding is in place for the implementation of the plan
4	Arrange another Rivers Conference focusing on the Lugg, Arrow and Frome.	Tue 28-Jan-25	Thu 27-Mar-25	Fri 4-Jul-25	Agreed. The Council will host a third annual rivers conference in Autumn 2025, the focus of which is to be confirmed, but will encompass high levels of phosphate within the Arrow, Lugg and Frome.
5	Prioritise processing of strategic planning applications to progress private mitigation and to reiterate the request to Ministry of Housing, Communities and Local Government to participate	Tue 28-Jan-25	Thu 27-Mar-25	Fri 4-Jul-25	Partially agreed. Currently the allocations policy for credits is in date order, this decision was taken by Cabinet in May 2022 https://councillors.herefordshire.gov.uk/ieDecisionDetails.aspx?ID=8816

	in the pilot scheme for the development of the nature restoration fund.				<p>A policy change would require further consideration with an accompanying rationale. Confirmation would be required from planning and legal that this could be delivered via the planning mechanism and a decision taken by Cabinet.</p> <p>A request has been made to MHCLG to participate in the pilot scheme for the development of the Nature Restoration Fund and can be reiterated at the next Nutrient Management Board meeting where the Deputy Director is due to attend.</p>
6	Invest, with partners, in a specific innovation process to consider approaches that have been successful in different locations or sectors and identify new approaches worth testing in the nutrient management context.	Tue 28-Jan-25	Thu 27-Mar-25	Fri 4-Jul-25	Agreed. Already underway the Council holds a funding pot for river restoration which can be allocated to schemes that demonstrate innovative technology in removing legacy Phosphorous from soils.
7	With partners, identify key outcomes that will indicate the success of actions to move towards river restoration and agree how these will be collected and reported.	Tue 28-Jan-25	Thu 27-Mar-25	Fri 4-Jul-25	Agreed. Already underway through the development of the Nutrient Management Plan which sets out actions and outcome-based reporting to record measurable reductions in phosphate levels.

Monday 24 March 2025

Energy Efficiency and Retrofitting

Rec. No.	Recommendation	Date Sent	Due Date	Recd Date	Response
1	Develops a plan to deliver progress on energy efficiency and retrofitting across Herefordshire, including targets, in line with their ambitions on net zero, to include the co-benefits that flow from this, including public health, wellbeing, and the cost of living	Mon 24-Mar-25	Sat 24-May-25	Wed 28-May-25	<p>Accept</p> <p>The Sustainability and Climate Change Team will draft a retrofit strategy for Herefordshire outlining how the council will directly and indirectly support, facilitate and encourage retrofit in the county. The ESSC will be consulted on a draft of the document once produced.</p>
2	Appoints a skills champion on the cabinet to drive forward upskilling across key business sectors, including energy efficiency and retrofitting, to support their growth ambitions for Herefordshire	Mon 24-Mar-25	Sat 24-May-25	Wed 28-May-25	<p>Developing skills across the county is a key priority for the council. Part of Councillor Graham Biggs role as Cabinet Member Economy and Growth is acting as the councils skills champion.</p> <p>There is a skills board in place chaired by David Williams principal of Herefordshire, Ludlow and North Shropshire College. Councillor Biggs sits on this board alongside</p>

					<p>council officers. All of the main colleges and training providers in the county are also members of this board. There is a collective effort between the skills board and business board to host an event bringing a number of Herefordshire businesses together to discuss and make provision for workforce planning, skills gaps and future skills needs.</p> <p>In addition £400,000 of UKSPF funding has been allocated to support employment and skills.</p> <p>Retrofit is a key part of the above as a key sector in the environmental economy.</p>
3	Promotes the Publicly Available Specification 2035 (PAS 2035) standard for council-funded retrofit delivery and investigates equivalent standards for private schemes to consider	Mon 24- Mar- 25	Sat 24- May- 25	Wed 28- May- 25	<p>Accept</p> <p>The next retrofit programme the council is gearing up to deliver is called Warm Homes: Local Grant which incorporates the use of PAS2035. This gives homeowners confidence the work is delivered to nationally recognised specifications and standards to ensure a high quality of work on their home.</p> <p>Through the creation of the Herefordshire Retrofit Strategy we will investigate what equivalent and alternative standards private homeowners could utilise instead of PAS 2035 and present the benefits and/or disbenefits of these alternative options.</p>
4	Arranges a summit of interest groups of landlords and tenants, To explore how to implement the Renters Right (Reform) Bill, when in force, with a focus on energy efficiency and retrofitting and a goal of improving living conditions for renters	Mon 24- Mar- 25	Sat 24- May- 25	Wed 28- May- 25	<p>Accept</p> <p>The Housing Team are considering the implications for housing services. The changes should give renters properties that meet standards giving better quality of housing, security and better rights. For Landlords it will highlight obligations they need to sustain in a longer tenancy agreement. However, it may decrease the number of properties that are available to rent due to the more onerous obligations and thus financial burden placed on landlords to meet standards. Landlords also may decide to sell to their properties due to this factor – which could reduce the supply of private rental stock, making it more difficult to secure a rental.</p> <p>The Housing Team will create a webpage with information</p>

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					for landlords and tenants – this can be a repository of information for both stakeholders. The Housing Team in conjunction with Environmental Health will look to hold a landlord forum with the National Residential Landlords Association (NRLA) to facilitate landlord training and accreditation. The Forum will take place once the Bill has been enacted.
5	Develops an able-to-pay market strategy which will: - identify the key barriers to able-to-pay investment - work with partners to overcome these barriers and - use the evidence of the growing market to encourage supplier investment in the retrofit market	Mon 24- Mar- 25	Sat 24- May- 25	Wed 28- May- 25	Accept We are currently exploring options available to the public to access private finance in support of domestic energy retrofit. Through the development of a retrofit strategy for the county we will explore the key barriers to 'able-to-pay' investment. Through the delivery of the strategy we will work with partners to overcome barriers that have been identified and look to stimulate private investment in the retrofit market as appropriate.
6	Investigates models of partnership with funders to offer private low interest finance to support the able to pay sector to retrofit within an able-to-pay strategy	Mon 24- Mar- 25	Sat 24- May- 25	Wed 28- May- 25	Accept Research has identified that a significant barrier to increasing finance for retrofit is the difficulty for lenders to prove that implemented measures will result in better energy efficiency. Currently there are a number of finance mechanisms and low cost loans but negative perceptions of borrowing, complex applications and uncertainty over eligibility are all hampering take-up. We will carry out further research into finance models that are available to residents to enable domestic retrofit.
7	Looks at ways to encourage small improvements and easy wins that would bring a disproportionate improvement to a property's energy efficiency.	Mon 24- Mar- 25	Sat 24- May- 25	Wed 28- May- 25	Accept We will explore this idea through our partner Keep Herefordshire Warm as well as via the Greener Footprints initiative in a similar way to the promotion of domestic energy retrofit last year Make your home more energy efficient - Herefordshire Zero Carbon and Nature Rich
8	Ensures that council funding towards intervention on retrofit skills continues to be used for projects that are appropriate for and reaching all retrofit-related companies in Herefordshire and focusing	Mon 24- Mar- 25	Sat 24- May- 25	Wed 28- May- 25	Accept For any future council funded projects that support retrofit skills we will ensure that the projects are appropriate for and targeted at all retrofit-related companies in Herefordshire

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	on existing people working in the industry as well as current students.				where possible within the terms and conditions of the funding source.
9	Considers promoting a summary of all the sources of advice, help, and finance more widely.	Mon 24- Mar- 25	Sat 24- May- 25	Wed 28- May- 25	Accept The Herefordshire Council website acts as a single repository for all of the useful links residents need in respect of home energy. Home energy – Herefordshire Council This includes links to the Keep Herefordshire Warm advice service which acts as a one stop shop for residents who want to pick up the phone for advice or send an email asking for help. Keep Herefordshire Warm promotes its services via a marketing strategy that has resulted in all Herefordshire Households receiving a flyer in March 2025. Days such as Fuel Poverty Awareness day help to further promote the service.
10	Analyses what it would take to bring all private rented accommodation up to the EPC C standard and identify what the council would do to help as soon as the EPC C announcement is made.	Mon 24- Mar- 25	Sat 24- May- 25	Wed 28- May- 25	Accept The private rented sector (PRS) accounts for 9,294 properties (approximately 11.1% of total). Currently 2,043 households have an EPC C or higher. The majority are in Band D (3,570) and Band E (2,192), Band F (711) and Band G (178). The government is reviewing the Private Rented Sector EPC band C by 2030. To bring these Herefordshire properties up to Band C the investment required is estimated at £367 million. This estimate has been calculated using the Parity Pathways tool.
11	Writes and further petitions the Government to demand that the EPC C standard is introduced for the private rented sector.	Mon 24- Mar- 25	Sat 24- May- 25	Wed 28- May- 25	Decline The government has recently consulted on the Energy Performance Certificate (EPC) reform and the Minimum Energy Efficiency Standards (MEES). The government is consulting on proposals to further raise the Minimum Energy Efficiency Standard for rented buildings to an EPC band rating of 'C' by 2027 and to a Band rating of B by 2030.
Waste contract					
Rec. No.	Recommendation	Date Sent	Due Date	Recd Date	Response
1	Commission a piece of work, exploring further options for improving current reuse and recycling rates across the county, in advance of any	Mon 24-	Sat 24-	Wed 28-	No response received.

expansion of the waste collection streams to food and garden.	Mar-25	May-25	May-25	
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Monday 12 May 2025**Road Safety**

Rec. No.	Recommendation	Date Sent	Due Date	Recd Date	Response
1	Herefordshire Council develops a road safety strategy that supports the priorities under People, Place and Growth in the Council Plan and complements the policy produced by the West Mercia Police and Crime Commissioner.	Tue 13-May-25	Sun 13-Jul-25	Mon 14-Jul-25	<p>The current road safety strategy contained within the existing Local Transport Plan (LTP) produced in 2018 is currently being rewritten in preparation for the new LTP expected in (20??). It is vitally important this strategy encompasses those elements that address a Highway Authorities statutory duty, under various existing highway legislation such as the The Highways Act 1980, and Road Traffic Act 1988 amongst others.</p> <p>At present all elements contained within the existing strategy encompass all actions an authority can reasonably be expected to take, with regard road traffic collision data management, investigation / casualty reduction engineering, delivery of road safety educational initiatives, speed management & general traffic management across the highway network. It is also important these strategies reflect the levels of service achievable within current resources allocated to this field in order to ensure a both realistic and sustainable approach for the future.</p> <p>At present there is a high level of collaboration between Herefordshire Council & West Mercia Police across the principle areas mentioned above, which will underpin the new strategy moving forward.</p> <p>This will be reviewed during the various draft stages prior to being formally adopted.</p> <p>The currently consulted on LTP has a requirement to support improved Road Safety with the following policy</p>

					<p>LTP Policy TN7: Road Safety</p> <p>To reduce the number of people being injured on our transport network we will:</p> <ul style="list-style-type: none"> • Monitor collision data to identify priority locations for improving road safety. • Take targeted action to further reduce fatalities and injuries on our network. • Support safer speeds to improve perceived and actual road safety. • Deliver education programmes and infrastructure to improve safety for vulnerable road users, <p>Investment will be prioritised in those areas with the highest numbers of vulnerable road users and/or collision history.</p> <p>Once adopted officers will be required to work on imbedding the policy</p>
2	The executive should seek opportunities to improve the road network environs in the five market towns to make them safer and to feel safer for all road users.	Tue 13- May- 25	Sun 13- Jul- 25	Mon 14- Jul- 25	<p>The upcoming revision of the current LTP will also contain a section relating directly to the Market Towns. Previous assessments of all market towns undertaken by BBLP as part of the Levelling Up Fund already exist however current progress is unclear and will require a review against existing priorities following completion of the new LTP.</p> <p>The interpretation of feeling safe is subjective therefore it would be impossible to properly monitor and target this recommendation. It should also be a drive for the Council to ensure all roads are safe as this is a legal obligation for all roads. - rephrase – road safety important, feelings of safety delivered across a whole range i.e. maintenance, LTP policy, As per the response to Recommendation 1 the LTP has a road safety policy requirement</p>
3	Herefordshire Council to work with West Mercia Police to unlock behavioural, perception of safety, and geographic data about near miss and dangerous driving reporting, to better inform	Tue 13- May- 25	Sun 13- Jul- 25	Mon 14- Jul- 25	<p>This is difficult to address as while we will investigate and where appropriate act on concerns raised, we have no formal way of collating reports that we receive and any response or action we take into a single source of</p>

	<p>decision-making about engineering, education and speed limit zone solutions.</p>			<p>information. Concerns and reports can come to us through a number of different channels such as phone calls to our Operational Call Centre, Operation Snap submissions, the contact us page on our website, Neighbourhood Matters, e-mails to our generic Road Safety Team inbox, direct contact with Safer Neighbourhood Teams and direct contact with Traffic Management Advisors. As there is no single point of contact it would be a significant undertaking to co-ordinate these and to report formally.</p> <p>Operation Snap is probably the easiest to quantify, but again, the resource needed to do this could have an impact on the overall number of submittals we then act on.</p> <p>The validity of using these reports as a basis for action could be questioned as they can sometimes give a disproportionate picture of what is happening on the network. We have had instances, particularly with Operation Snap, where a co-ordinated plan of action by an individual and/or a small number of residents in a particular area shows a high number of reported incidents and suggests a major problem with one type of incident at a particular location.</p> <p>While useful, reporting of this nature does not necessarily give an accurate reflection of concerns held by the wider public or the number of incidents happening across the network as it relies on people actually reporting them rather than "suffering in silence". An individual's perception of risk and danger differs from one person to another, so it does not give the degree of quantifiable, fact based evidence that injury RTC reports do.</p> <p>Information on collisions where there has been a personal injury is collected by the Police, passed to Herefordshire Council, and more detailed collision investigation done by the Accident Investigation & Safety Manager. Where</p>
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					<p>appropriate any remedial works at collision cluster sites/routes is then channelled into the future maintenance programmes etc. Herefordshire Council, BBLP and West Mercia Police's Traffic Management Advisor have a long standing, close working relationship on this and all highway matters.</p> <p>Collision data is also assessed by the Police and targeted enforcement is conducted on areas where there is a particular issue such as "high harm" motorcycle routes. Link to LTP</p>
4	For the council to undertake an evidence-based increase of the road safety education budget, or to transfer funding from schemes for children to older adults.	Tue 13- May- 25	Sun 13- Jul- 25	Mon 14- Jul- 25	<p>It would not be appropriate to remove funding from children road safety education to that for older adults as these are vulnerable road users. The Council does offer older adult driver training and additional funding would allow for the scope of the offer to be increased.</p> <p>There would be scope to work with the emergency services to delivery joint educational training opportunities; for example, both West Mercia Police and Shropshire Council funded young adult road safety education videos one of which focuses on Herefordshire; this model shows how we can collaborative on initiatives.</p> <p>Retain work with children, we do offer older training, when budgets are set me will consider opportunities to increase funding to increase the offer.</p>
5	West Mercia Police to consider the balance of factors that contribute to road danger when undertaking road safety enforcement.	Tue 13- May- 25	Sun 13- Jul- 25	Mon 14- Jul- 25	<p>West Mercia Police are committed to enforcing all road traffic legislation, and while speed enforcement may appear to have the highest public profile, our the police Operational Policing Units undertake all forms of enforcement year round in conjunction with NPCC campaigns such as summer & Christmas drink/drug drive, tyre safe, mobile phone use and driving without seatbelts. In addition, our speed enforcement officers are now able to provide evidence of additional offences such as drivers using mobile phones, not wearing seat belts, driving whilst not in proper control etc so while speed enforcement is the priority for</p>

					<p>them the activity contributes to the wider enforcement picture.</p> <p>This recommendation cannot be accepted as Herefordshire Council do not have the ability to direct police resources.</p>
6	The Traffic Regulation Order (TRO) eligibility criteria should be made more transparent.	Tue 13- May- 25	Sun 13- Jul- 25	Mon 14- Jul- 25	<p>There is currently no one specific eligibility criteria for the provision of Traffic Regulation Orders. These are assessed on an individual case by case basis by trained Traffic Engineers, and depend upon a multitude of factors that are determined upon investigation. It is vitally important these are evidence based / data led and follow both national and local best practice guidance / regulations, in order to ensure consistency of application.</p> <p>The Traffic Management Team have reviewed TRO information which is available online and have found it to be no longer fit for purpose. What happens now? Some changes have already been made to provide more transparent information with some more slight amendments and updates to be progressed imminently. The Team are to also upload a copy of the prioritised waiting list so current applications can be seen online. The stages of the application process to also be amended to ensure clarity.</p>

Monday 16 December 2025
Carbon Neutral Housing

Rec. No.	Recommendation	Date Sent	Due Date	Recd Date	Response
1	The Executive should commission a piece of work in collaboration with housebuilders (including housing associations) to quantify the impact of implementation of the Future Homes Standard on the achievability of the new housing target for the County of 27,260. This should include the future availability of new affordable and social housing.	Fri 19- Dec- 25	Thur 19- Feb- 26	Tue 17- Feb- 26	<p>Partly Accept</p> <p>A Local Plan viability study for Herefordshire is the most appropriate and robust mechanism for assessing the impact of the Future Homes Standard (FHS) because it will independently and transparently test the cumulative effect of mandatory national requirements alongside local planning policies over the full plan period to 2045, rather than treating the FHS in isolation.</p>

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2	The Executive should continue discussions with relevant industry partners to evaluate the skills required to deliver the Future Home Standard in the County and how this will feed into a joined-up approach by the Council including colleges, the youth employment hub and those involved in career advice.	Fri 19- Dec- 25	Thur 19- Feb- 25	Tue 17- Feb- 26	Accept Building Regulations applicable to domestic properties are a Level 2 surveyor. All surveyors currently working for Herefordshire Council are capable of domestic projects with a floor level not exceeding 7.5m.
3	The Executive should implement a review of the Council's policy and operational readiness and preparedness of planning and building control to ensure they are fit for purpose for when the Future Homes Standard finally comes into force, including training requirements.	Fri 19- Dec- 25	Thur 19- Feb- 25	Tue 17- Feb- 26	Partly accept Building Control have restructured to meet the current demands, however, recruitment is troublesome at this time, partly due to Herefordshire's time-consuming procedures and partly market conditions. The FHS appears to be a change to the Building Regulations 2010 and not a structural change to the Building Act 1984. A change to the Building Regulations is much easier to accommodate and will inevitably be supported with LABC training. The new structure, once fulfilled should be in a position to accommodate the changes. Planning: FHS considerations to be incorporated into Local Plan preparation process.
4	The Executive undertake a review/audit of the government support being put in place to assist the market to deliver the quantum of carbon neutral homes.	Fri 19- Dec- 25	Thur 19- Feb- 25	Tue 17- Feb- 26	Agree The Warm Homes Plan was released in January 2026. This aims to triple the number of homes with solar power by up to 3 million homes, deliver 450,000 heat pump installations, upgrade 5 million homes in total and double the amount of heat demand met via heat networks by 2035.
5	In the development of the Local Plan 'building control standards' are reviewed to ensure they are aligned with the Future Homes Standard and provide viable and affordable compliance with the development of 'carbon neutral' homes.	Fri 19- Dec- 25	Thur 19- Feb- 25	Tue 17- Feb- 26	Reject The Herefordshire Local Plan will include specific policies addressing climate change and carbon neutrality, with all policies and proposals underpinned by a viability assessment to ensure deliverability. The Future Homes Standard, which will apply to all new homes once it comes into force, is expected to be implemented, following legislation anticipated in 2026, with full compliance subsequently required. Government is yet to produce a formal timetable for the FHS. National guidance is clear that

					local plans should not duplicate statutory requirements, including Building Regulations, or repeat matters already covered by national policy. This is a long-standing principle set out in the current National Planning Policy Framework (NPPF) (and the consultation draft version) and in national Planning Practice Guidance (PPG). This ensures that local plans are clear and that unnecessary duplication is avoided
6	The Local Plan – through building control policies ensures that every new home built is fitted with solar panelling and/or renewable heat sources to reduce the pressure on the national grid.	Fri 19- Dec- 25	Thur 19- Feb- 25	Tue 17- Feb- 26	<p>Reject</p> <p>The Future Homes Standard, which will apply to all new homes once it comes into force, is expected to be implemented, following legislation anticipated in 2026, with full compliance subsequently required. Government is yet to produce a formal timetable for the FHS. The Herefordshire Local Plan will include specific policies addressing climate change and carbon neutrality, with all policies and proposals underpinned by a viability assessment to ensure deliverability. However, national guidance is clear that local plans should not duplicate statutory requirements, including Building Regulations, or repeat matters already covered by national policy. This is a long-standing principle set out in the current National Planning Policy Framework (NPPF) (and the consultation draft version) and in national Planning Practice Guidance (PPG). This ensures that local plans are clear and that unnecessary duplication is avoided.</p> <p>Note: alongside the consultation draft NPPF, Government is also consulting on its draft Design and Placemaking Planning Practice Guidance (ending on 10 March 2026). This includes a section on how the design of new buildings can maximise adaptation, mitigation and resilience to extreme weather and other effects of climate change.</p>
7	The Executive encourages government and other stakeholders to investigate and consider options that allow a more balanced approach to the financial products available for home buyers to allow for downstream energy cost savings to provide a more attractive purchase options carbon	Fri 19- Dec- 25	Thur 19- Feb- 25	Tue 17- Feb- 26	<p>Agree</p> <p>The Warm Homes Plan was released in January 2026. This aims to triple the number of homes with solar power by up to 3 million homes, deliver 450,000 heat pump installations, upgrade 5 million homes in total and double the amount of heat OFFICIAL demand met via heat networks by 2035. It</p>

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	neutral homes for those who have income but lower equity.			states that innovative financial products will be made available via various schemes to help improve the housing stock that will include low and zero-interest loans for households irrespective of income. No further detail has been supplied.
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