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Our ref: 34298-839-Herefordshire Core Strategy  
Revised Preferred Option  
Your ref: 839



Dave Nicholson  
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**By Email**

Dear Mr Nicholson,

**Herefordshire Core Strategy Revised Preferred Option**

**Revised Preferred Options Leaflet (Sept 11); Revised Preferred Options Background Paper (Oct 11); Revised Preferred Options – Sustainability Appraisal Note (July 11); Revised Preferred Options – Habitats Regulations Assessment (August 11)**

Thank you for your consultation on the above, which was received by Natural England on 27 September 2011.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our role is to support the Government's wider strategic policies and fulfil the aims and objectives set for us by the Secretary of State for Environment, Food and Rural Affairs.

Natural England supports the intention behind the revisions to the Preferred Options; to make the Core Strategy more locally driven and relevant. The proposed changes raise no direct issues for Natural England's interests, but would like to take this opportunity to highlight ongoing concerns.

Our detailed comments on the changes to the Core Strategy preferred options policies are provided below.

**Comments on the Revisions to the Preferred Options**

**Hereford Housing Allocations**

Natural England did not raise any specific objections to the housing figures and locations proposed in the previous Preferred Options consultation; we therefore have no in principle issues in relation to the proposed reductions.

We welcome the weight given to the potential landscape impacts which would have resulted from the original proposals for Whitecross and Holmer West.

The treatment and discharge of sewage in the context of the Habitats Regulations remains a significant challenge for development in Hereford. Policies for growth in/around Hereford need to place specific requirements on developers to deliver the highest achievable standards of sustainable water use. This could include the separation of clean surface water from foul as standard where not already required, SuDS, grey water recycling, fitted water butts and high

standards of water efficiency in the build. In addition all development must be required to contribute towards long-term reductions in Phosphate levels; this could include through financial contributions. Further requirements may become apparent pending further work on this issue and we welcome ongoing involvement in the Water Steering Group.

### **Hereford Relief Road**

The Council is aware that Natural England does not support the relief road proposal. We maintain our view that transport investment should focus on managing demand and prioritising environmentally sustainable, low carbon modes and technologies. If the relief road does go ahead it must do so in a way which ensures the highest levels of protection and enhancement for the environment and we maintain our commitment and willingness to work with the council on this matter.

Natural England's comments refer to the Policy H2: Movement, not the WRR proposal itself which should be the subject of separate discussions. Notwithstanding the HRA review, which states that the potential for effects to occur still remain, the effect of the policy is likely to mean negative impacts on landscape and views, wider biodiversity interests and risks to the River Wye SAC. We are concerned that the further work required before the Council can conclude with certainty that Policy H2 is in conformity with the Habitats Regulations has not yet been undertaken. Policy H2 should include any specific requirements relating to the relief road's location, design and construction, as informed by further work on the HRA, which are deemed necessary to the avoidance of Adverse Effects on the Integrity of the River Wye SAC. We stress the importance and building urgency for the need for further ecological surveys, air and water quality and hydrological/hydrogeological surveys to inform the HRA Screening/Appropriate Assessment of the Core Strategy (as recommended in Amey's Habitats Regulations Assessment for the Route Corridor Options Screening Report, December 2010).

As a matter of best practice we recommend that landscape and visual impacts and impacts on wider biodiversity are given further consideration in advance of finalising the Core Strategy policies on the relief road. This would enable the policy to include requirements designed to minimise identified impacts. In addition to minimising impacts, we would welcome the designing-in of environmental opportunities/benefits, for example tree planting. Benefits should be secured through the Core Strategy's policies and delivered in the context of green infrastructure.

We note that detailed work on the alignment of the road will be undertaken during the production of the Hereford Area Plan.

### **Rotherwas Enterprise Zone**

We note the commentary on the Rotherwas Enterprise Zone and transport links east of Hereford and would welcome further dialogue on this matter.

### **The Market Towns**

We note the reduction in housing numbers for Leominster and Ross-on-Wye and the addition of an employment site at the urban expansion site in Leominster.

We would like to reiterate our concerns regarding the sustainability of locating Leominster's growth with the view to delivering a southern link road. We recommend that growth in Leominster delivers exemplary levels of sustainable transport provision in order to minimise induced traffic. There should be excellent public transport connections between the proposed growth and the station. As far as we are aware, the interrelationships around the proposed roads at Leominster and Hereford have not been investigated.

## Rural Settlements

We note the increase in new homes for rural settlements. Whilst we have no specific issues with this as a policy direction, the Council should be aware that for all locations which discharge their sewage into the River Wye and River Lugg, an investigation of the capacity of the existing sewage infrastructure in the context of the Conservation Objectives for the receiving watercourse must be undertaken. In some cases the infrastructure necessary for the discharge of sewage in the context of the Habitats Regulations could impact the viability of proposed developments, and this may need further investigation.

## Sustainability

We welcome the reference given to policies covering sustainable construction and the environment and look forward to seeing the draft policies on these matters.

The larger developments, i.e. the urban extensions and the city centre 'urban village', will shape the future of the county. It is therefore imperative that they are delivered to the highest achievable standards. With economies of scale on their side, these developments provide real opportunities to deliver exemplary development with high standards of design and development, setting the bar for development elsewhere. Exemplary development could include:

- GI – High quality local networks connected into the wider networks, plus a financial contribution to the strategic GI required to maintain/enhance overall sustainability;
- Energy efficiency – achievement of zero carbon in advance of the nationally set timetable;
- Renewable energy – significant levels of renewable energy generated on-site, potentially through community-scale generation;
- Design – where surrounding development standards are low the design of new developments should set a new, locally distinctive standard.

We hope that the revision of the draft Core Strategy includes a Green Infrastructure policy, as the previous iteration did. Green Infrastructure (GI) should be an integral part of the creation of sustainable communities. Thus GI should be an integral part of any Core Strategy and the allocation of new sites and policy development through the LDF.

One important function of GI is the provision of new opportunities for access to open space. Natural England's 'standards for accessible natural greenspace' ([ANGSt](#)) provides a set of benchmarks, which should be used to ensure new and existing housing has access to nature. More information can be found on Natural England's publication, '*Nature Nearby, Accessible Greenspace Guidance*' (March 2010), available on our [website](#), publication reference NE265.

The CABE Space Guidance '*Start with the Park*' (2005) outlines the importance of planning around green spaces, with consideration being given to the context of local landscape character and contribution to the wider GI network. The provision of new GI should be considered at an early stage to ensure it is deliverable at plan stage.

We also suggest that the Council considers developing Green Infrastructure Concept Statements for the large scale urban extensions. These would provide the council with an opportunity to set really clear requirements and aspirations and proactively influence the site's masterplanning. Further information regarding Concept Statements is available from our website, including a Natural England report by the Planning Cooperative (2007): [http://www.naturalengland.org.uk/Images/concept-statements\\_tcm6-19854.pdf](http://www.naturalengland.org.uk/Images/concept-statements_tcm6-19854.pdf).

## **Habitat Regulations Assessment and Strategic Environmental Assessment**

Natural England would welcome further discussions about the Habitats Regulations Assessment and the Sustainability Appraisal before Herefordshire's Cabinet considers the submission draft Core Strategy in May 2012. I would like to remind Herefordshire Council that Natural England will have to consider if the CS is legally compliant and meets the relevant tests for soundness. At the same time, Natural England needs to formally consider if the HRA is in compliance with *The Conservation of Habitats and Species Regulations 2010* and if the Sustainability Appraisal (SA) is in compliance with the SEA Regulations (European Directive 2001/42/EC and *The Environmental Assessment of Plans and Programmes Regulations 2004*).

There are numerous outstanding issues relating to requirements under the *Conservation of Habitats and Species Regulations 2010* (the 'Habitats Regulations') which need to be resolved prior to the submission of the Core Strategy. The HRA process needs to be completed early enough for its conclusions to shape and inform the Core Strategy; the Council will be aware that this 'shaping' has the potential to go beyond simple alterations to policy wording. The Council should also be aware that the nature and complexity of some of these issues, particularly those around sewage discharges, has the potential to impact on the proposed Core Strategy production timescales. We remain committed to working with the Council on these matters.

Natural England notes the HRA review for the following changes to the CS:

- **Rural Areas - Policy RA1** (the revised preferred option increases the housing numbers in rural areas and market towns by 800). The potential effects already identified in Nov 2010 are **now more likely to occur**.
- **Rural Areas - Policy RA5** (the revised preferred option creates more local jobs). The potential effects already identified in Nov 2010 are **now more likely to occur**.
- **Market Towns - Ross-on-Wye policy** (the revised preferred option reduces the total number of homes to be provided over the plan period from 1,000 to 900 and the number in the Hildesley urban extension from 350 to 200). **The potential for effects to occur still remain.**
- **Hereford - Policy H1: City Centre** (the revised preferred option increases the amount of retail floorspace from 40,000sqm to 46,000sqm). **The potential for effects to occur still remain.**
- **Hereford - Policy H3: Growth Distribution** (the revised preferred option reduces the overall amount of new homes to be built in Hereford by 2,000, mainly as a result of reduced housing allocations at Holmer West and removal of the Whitecross site. It also removes the employment site at Holmer East). **The potential for effects to occur still remain.**
- **Hereford - Policy H4: Northern Urban Expansions** (the revised preferred option reduces the number of homes at Holmer West and removes the employment site at Holmer East. The allocation for a new primary school at Holmer West has also been removed with improvements to existing facilities instead). **The potential for effects to occur still remain.**
- **Hereford - Policy H5: Western Urban Expansions** (the revised preferred option removes the strategic site at Whitecross and the primary school previously planned at Whitecross will now be built at Three Elms instead). **The potential for effects to occur still remain.**
- **Market Towns – Leominster.** (the housing allocation for the town has been reduced by 200 and a new allocation has been made for 5ha of employment land at the urban extension). **The potential for effects to occur still remain.**

Natural England is disappointed that the Habitats Regulations Assessment Note August 2011 does not make any reference to 'in combination' effects. It is essential that the HRA recognises the need to consider in combination effects arising from the CS and other Plans and Proposals (including any arising out of the delivery of a Relief Road). A full consideration of 'in combination effects' is a requirement for the HRA of the Core Strategy.

Natural England would point out that if there are further significant alterations to the Core Strategy resulting from this consultation or during any other stage of the CS (e.g. at formal public consultation stage, pre-publication consultation and during or after the Examination), then the HRA should also be updated.

I hope that this response is of assistance. For any correspondence or queries relating to this consultation only, please contact Hayley Pankhurst using the details given below. For all other correspondence, please contact the address above.

Yours sincerely,

A handwritten signature in cursive script that reads "HPankhurst".

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