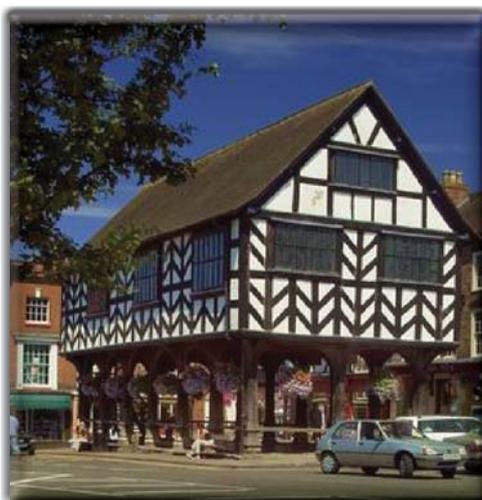
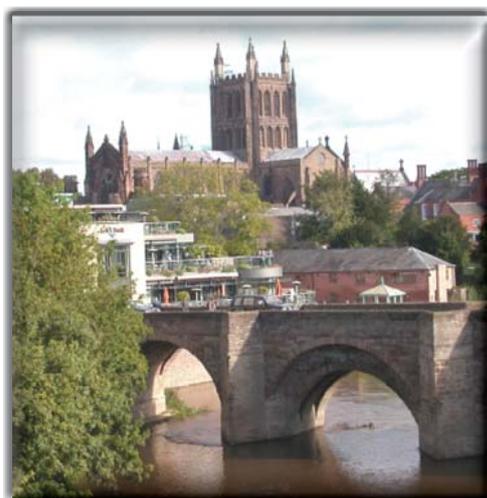


Shaping our Place 2026
Local Development Framework

Free Write Analysis Schedules for market towns, rural areas and general policies

December 2010



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Introduction

Preferred Option Papers for the Core Strategy were published and a targeted consultation took place between July and November 2010. These papers detailed the preferred options that arose out of the Place Shaping Consultation (Jan to March), for the Market Towns of Bromyard, Ledbury and Ross; the rural areas; and the general policies to be included in the Core Strategy.

The Leominster preferred option was not consulted on in this round, as it was detailed and consulted upon as part of the Place Shaping consultation. Kington does not have any strategic sites identified for the Core Strategy and therefore does not have any options to consult upon at this stage.

In order to gain opinions on the preferred options the documents were sent to all those who responded to the Place Shaping consultation copies were made available on the website and at the information evenings. More details on the consultation methods undertaken and the numbers of responses received can be seen in 'Consultation Statement Part 4 – Addendum Preferred Options' which is available on www.herefordshire.gov.uk/ldf or on request from the Planning Policy section.

This report contains a number of schedules summarising the responses to the free write text questions. These have been grouped into themes. The schedules list the comments which were raised most often but it should be noted that the total number of comments made can be seen in the summary of questionnaire response section. The schedules also highlight some of the key stakeholder responses, and the relevant evidence base studies which need to be examined to further the Core Strategy.

There is also a graphical representation of the number of responses which can be found in the 'Consultation Statement Part 4 – Preferred Options Results Report', available on the website.

Do you agree with the Preferred Option for Bromyard?	
Summary of Questionnaire responses (from associated report)	
<p>35 people responded to questions specifically about Bromyard. (49%) 17 agreed (8%) 3 agreed in part (26%) 9 disagreed. (17%) 6 not specified</p>	
Summary of free-write questionnaire comments received	How addressed in the Core Strategy
Bullet point about treatment works is too vague. Needs to be clarified that developers will need to contribute to works if not in Welsh Water's capital programme.	Further information received from Welsh Water (see below). Requirements such as hydraulic modelling can be addressed in MTRAP.
Linton Trading Estate should not be in the plan as an employment allocation.	No change. Meets with spatial strategy
Bromyard residents want more sport and recreational space.	A formal park is proposed as part of the urban extension. Further recreational and sports facilities can be addressed in the Market Towns and Rural Areas Plan (MTRAP)
There should be a relief road from A44 to B4214 Tenbury Road	A relief road in this location would not be feasible.
Ensure that sufficient land exists at Porthouse for future expansion.	These issues can be addressed through employment policies within the Core Strategy
Linton site would only be able to accommodate small units due to its prominence	Landscape impacts addressed in Core Strategy wording and to be further addressed at masterplanning stage and in MTRAP.
There should be a dispersed strategy for employment land	There is a limited supply of potential employment land within Bromyard to provide a total of 5 hectares for potential development.
Additional services and facilities need to be provided to absorb the increase in local population.	New development will need to provide appropriate infrastructure in accordance with requirements of statutory undertakers
Question the need for a new formal park	Open Space Study provides evidence for the need for a formal park
The development at Hardwick Bank would provide a good opportunity to investigate the archaeology in the Leominster Road site area.	Noted
Bromyard is not a good location for large manufacturing companies as workforce will be mainly commuters	No change. Policy is in accordance with spatial strategy.

There is a lack of open market and affordable housing	The policy for Bromyard proposes 40% affordable development and this is evidenced in the Affordable Housing Viability Study
Tenbury Road site (Option one in Place Shaping Paper 2010) is a better site.	No change. Least favoured option in Place Shaping consultation and evidence provided.
Objection to the 40% affordable housing target, 35% more acceptable	The Affordable Housing Viability Study provides evidence for requesting 40% affordable housing in Bromyard.
No more infilling within the town	No change. UDP policies will be used to determine future development until MTRAP addresses such issues
Better opportunities for people to live and work in the same location	Addressed in Core Strategy policies
Support for small scale employment proposals	Addressed in Core Strategy policies
Future housing proposals must ensure the River Frome is not affected.	Addressed in Core Strategy policies
Stoke Lacy, Bishops Frome and the outlying villages could accommodate housing and employment development	Rural Areas settlement hierarchy sets out the policies for these locations.
Development at Hardwick Bank will increase the existing issue of surface water run-off	Surface water drainage/ water matters will be considered in MTRAP.
Bromyard Police Station and airwaves communications network to be extended	Developer contributions will be required to address impacts on community facilities/services.
Bromyard Retained Duty System (RDS) fire station capacity to be upgraded.	Developer contributions will be required to address impacts on community facilities/services.
Further expansion on the type of mitigation measures required for the proposed urban extension and employment site.	Addressed in Core Strategy policies
Need to be more specific about type of sports facilities to be provided as part of the urban extension	Will be addressed in MTRAP
Demand for a swimming pool is likely to be low but it may be necessary for quality improvements to the Sports Hall.	Will be addressed in MTRAP
Open up land at the back of Holdens along the Tenbury Road for further major industrial development.	Land liable to flood
The urban extension is isolated from the town	No change, Considered at Place Shaping consultation and Preferred Options consultation with minimal opposition.
Housing association ratios should be 60-40% not 40-60% especially in this economic climate.	The policy for Bromyard proposes 40% affordable development and this is evidenced in the Affordable Housing Viability Study

Summary of responses from Stakeholders

Welsh Water: Fully support the policies for the market towns. Development within the town area would not cause an issue but any proposal on the outskirts would necessitate the need for off site water mains, the extent of which would need to be determined through hydraulic modelling assessment, paid for by developers.

Waste Upgrading works to the Bromyard Waste water Treatment works were completed in March 2010 and will be able to accept the additional 250 homes proposed. The localised problems at Petty Bridge Sewage Pumping Station are being resolved by March 2011. The risk of flooding at Bromyard (Linton Lane) is expected to be reduced by a planned maintenance scheme at Petty Bridge Pumping Station.

English Heritage: More consistency is needed when addressing historic environment considerations. There should be further expansion on the type of general mitigation measures required for the proposed urban extension and employment site. Green infrastructure should be more clearly linked.

Sport England: Demand is likely to be insufficient, even taking into account growth, to justify a new pool or STP however it might be necessary for quality improvements to the Sports Hall. There is underprovision of outdoor sports. It would be useful to identify what type of sports facilities were needed in the park.

Bromyard & Winslow Town Council: The Council supports the preferred option. There should be a relief road from the A44 on the western side of Bromyard to the B4214, Tenbury Road. There should be protection of the existing industry in place at Porthouse Industrial Estate and does not wish to see it threatened by large scale residential development. Support for the redevelopment of Linton.

West Mercia Police: WMP request the following references:

Bromyard Police Station and Airwaves communications network to be extended. Bromyard Retained Duty System (RDS) Fire Station capacity to be upgraded.

The Coal Authority: There are no coal mining issues affecting Bromyard.

Any new issues to be considered in HAP or MTRAP:

The Council Depot could be relocated to Linton

The Cricket Club could relocate to Porthouse.

Adequate provision for bus stops should be made in the town centre due to the likelihood of increased traffic.

The road network could benefit from better signage for lorry routes

The evidence base developed through the rapid urban characterisation of the market towns, the series of HEDIDS reports (e.g. Bromyard) and the county wide historic farmsteads mapping report should be actively used to inform policy and implementation context for these areas- this should be set out in the Core Strategy but with greater detail in the MTRAP. The issue of the town's Conservation area being at risk can also be addressed in the MTRAP.

There should be a review of speed limits along lanes

Consider land at 'Freshacre' Panniers Lane as a non strategic site

Any new options to be considered before Submission?

No

Any new evidence required?

Surface water management plan required for the urban extension.

Question: Do you agree with the preferred option for Ledbury?

Summary of Questionnaire responses (from associated report)

Support - 9

Yes with minor changes - 16

No- 38

Undecided - 7

Total responses - 70

Therefore a total of 36% of respondents generally support the proposal, whereas 54% of respondents do not.

Summary of free-write questionnaire comments received

How addressed in Core Strategy

Too many houses proposed

No change - meets with spatial strategy

Proposal is unviable

Awaiting final viability testing

Density too high

Considered acceptable in edge of town location - no change

Need pedestrian/cycle and road junction improvements

Addressed in Policy wording

Concern at new school

Will be addressed in MTRAP

Concern at proposed live-work units

Will be addressed in MTRAP

Need bypass under viaduct

Addressed in policy wording

Concern at impact on car parking

Will be addressed in MTRAP

Needs to be supported with sufficient infrastructure

Addressed in policy wording

Concern at phasing

Addressed in policy wording

Any affordable housing needs to be for local people

Addressed in general policy on affordable housing

Too separate from town

Addressed in Policy wording

Concern at impact on listed viaduct

Addressed through masterplanning

Impact on AONB

No change - meets with spatial strategy

Need renewable energy scheme

Addressed in policy wording

Summary of responses from Stakeholders

Malvern Hills AONB - Concern at impact on AONB, suggest use of renewable

CPRE - support

Ledbury Civic Society - Concern at amount of new housing, need good pedestrian links, need new open space

Ledbury Town Council - Concern at amount of new housing, need good links into town, Bromyard Rd junction improvements needed, affordable housing should be for local people, needs to be supported by sufficient infrastructure

Sport England - need new provision - dual use with school?

Any new issues to be considered in HAP or MTRAP:

Car parking

Open space provision/protection

Any new options to be considered before Submission?

Move FC/CC to Viaduct site? - Considered unrealistic option given site size constraints, flooding and other infrastructure requirements of site.

Any new evidence required?

Transport assessment

SWMP

Noise Assessment

Question: Do you agree with the preferred option for Ross-on-Wye?	
Summary of Questionnaire responses (from associated report)	
Total: 41 Yes: 29% (12) Yes with minor changes: 22% (9) No: 24% (10) Not specified: 24% (10)	
Summary of free-write questionnaire comments received	How addressed in Core Strategy
Support Hildersely site	No change
Adverse impacts on traffic flows (adjoining site & in Ross town)	Detailed transport assessments/modelling to be carried out at masterplanning stage.
Concern over consultation methods/respose rate	Consultation undertaken in accordance with the Town & Country Planning (Local Development) (England) (Amendment) Regulations 2008, PPS 12 and the Statement of Community Involvement
Firing range: noise /safety concerns	Acoustic assessments & safety issues will be addressed at masterplanning stage. Will be addressed in MTRAP.
Hildersley: oppose site	No change. Considered as option in Place Shaping Paper and follow-on consultation stages.
Oppose overall housing strategy	No change. Meets with spatial strategy.
Water & sewerage infrastructure considerations	Development will need to provide appropriate infrastructure in accordance with requirements of statutory undertakers.
Need more employment opportunities	10ha Model Farm site will provide new employment opportunities during plan period.
Impacts on community facilities/services	Addressed in policy wording.
Opposes Ross' level of housing growth	No change. Meets with spatial strategy.
Support housing strategy for Ross	No change.
Support need to protect landscape, townscape &	No change.
Adverse landscape impacts	Landscape impacts addressed during site selection stage & in CS wording & to be further addressed at masterplanning stage and in MTRAP.
Need road linking Hildersley to Tudorville	Detailed transport assessments/modelling to be carried out at masterplanning stage.
Support promotion of sustainable transport links	No change.
Hildersley: good relationship/links with town	No change.
Alternative sites proposed	No change. Policy provides for smaller dispersed developments in/around Ross.

Housing will attract more retired people	No change. Policy is in accordance with spatial strategy.
Will need additional car parking in Ross	Will be addressed in MTRAP.
Emergency services requirements	Developer contributions will be required to address impacts on community
Support promotion of green infrastructure	No change.
Adverse impacts on biodiversity	Addressed in policy wording.
Viability/delivery concerns	Awaiting report on viability testing.
Oppose Overross	No change. Considered as option in Place Shaping Paper and follow-on consultation stages.
Flood risk	Assessments/statutory consultations did not highlight flooding as an issue. Surface water drainage/water matters will be considered in MTRAP/masterplanning stages.
Support Overross	No change. Considered as option in Place Shaping Paper and follow-on consultation stages.
Limited demand for new homes	No change proposed levels of growth accord with spatial strategy.
Hildersley: does not unacceptably encroach into	No change.
Hildersely: no physical constraints to development	No change.
Hildersley: provides opportunities for development in future plan periods	No change.
Hildersely: is site large enough for 350 homes?	No change. Site size considered appropriate.
Hildersley: want fewer houses on this site	No change. Capacity considered appropriate.
Support affordable housing targets	No change.
Is 40% affordable housing target viable?	No change. Target is in accordance with strategy on affordable housing.
Support tourism elements of strategy	No change.
Adverse impacts on tourism	No change. MTRAP will address promotion of Ross as tourist destination. Strategic developments not considered to adversely impact on tourism attraction of Ross.
Need to address sustainable design & energy technologies	No change. These issues are addressed through Core Strategy policies.
Concerned over retail evidence/proposals	No change. Policies developed in accordance with evidence base studies.
Support recognition of important historic heritage	No change.
Want more detail on proposed housing development	No change. More detail will be provided in MTRAP/masterplanning.
Support contents of Ross Town Plan	Noted.

Summary of responses from Stakeholders

Dwr Cymru Welsh Water: Overall support for policy. Water: development on outskirts requires need for off-site water mains. Waste: treatment works upgrade completed in March 2010 and able to accept additional 350 homes proposed; new development would need to connect to public sewers at locations which would avoid exacerbation of service to customers.

Ross Civic Society: Agrees with preferred option, but notes that additional housing will result in more traffic using Ross and there will be a subsequent need for additional car parking.

Ministry of Defence: Concerned that the strategic housing site encroaches onto MOD firing range. Reiterates that MOD not prepared to release land unless new provision is made, and developer would need to purchase entire range. Requires clarification that development would not encroach on to MOD land. Supports need for acoustic/visual buffer between development and rifle range. Alternative site would need to be ready for immediate use with all associated facilities and good access to Pontrilas/Credenhill. MOD will not release only part of the site.

West Mercia Police: Ross police station needs to be extended.

Ross Town Plan: New infrastructure to alleviate traffic congestion. South bypass is vital. New jobs needed.

Sports England: Possible need for a new 4 court sports hall, an artificial football/rugby pitch and 4 lane swimming pool (modelling required). Extensive under provision of outdoor sport. Need to be more specific about protecting outdoor sports facilities (evidence needed).

Ross & District Civic Society: Support 350 homes at Hildersley. Would not like to see Hildersley developed but not tanyard Lane because housing need calculations were excessive. Could Homs Road car park be considered for housing? It is scarcely used by motorists and is unattractive.

Hereford & Worcester Fire & Rescue Service: additional fire engine required for Ross RDS Fire Station.

Wye Valley AONB unit: satisfied with overall approach in Ross. Agree will local issues for inclusion in MTRAP, but consider further reference should be made to enhancement & protection of AONB. Development at Hildersley should be confined to lower slopes and not extend up to woodland edge. Townscape, landscape & visual impact issues should be fully addressed at masterplanning stage. Incorporate sustainable design and alternative energy technologies.

English Heritage: The preferred option appears justified on the basis of the information presented.

Ross Town Council: General support for spatial strategy for Ross. Recognise that some greenfield development will be required. Would prefer more dispersed development, but prefer Hildersley to Overross. Welcome affordable housing targets. Welcome developer contributions towards community facilities. Supports Ross Town Plan and recommends it is used to guide policy direction.

CPRE: Agree with preferred option for Ross.

Association of Ross Traders: retail study is flawed in its assumption that it is appropriate to convert surplus expenditure to floorspace, in order to provide an indication of need for further provision. There are still 13% empty shops. Note additional comparison retail space suggested has been reduced. Oppose loss of Red Meadow car park as suitable development. Pleased that number of discount/charity shops is acknowledged as a weakness. What proposals will be advanced to address this? Pleased that historic & important town centre and tourism is recognised. Why is an additional 3,500 sq m comparison retail proposed towards the end of the plan period?

Any new issues to be considered in HAP or MTRAP

No

Any new options to be considered before Submission?

No

Any new evidence required?

Acoustic Evaluation of firing range - to be undertaken by the developer

Traffic Assessment - to be undertaken by the developer

Question: Rural Areas Preferred option

Summary of Questionnaire responses (from associated report)

Of the 114 comments received:
 75% (85) Agreed / Agreed with some comments
 22% (25) Disagreed
 3% (4) Did not comment

Of the above a total of 39 Parish and Town councils responded:
 90% (35) Agreed / Agreed with some comments
 8% (3) Disagreed
 2% (1) Did not specifically state

Summary of free-write questionnaire comments received	How addressed in the Core Strategy
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A majority of the respondents agreed with the rural areas preferred option however there were some concerns raised, these included:

Strong need for more affordable housing for local people, not just social housing	The affordable housing policy ensures that there should be a local connection. Affordable housing is not just social housing but a range of other options are available, these are to be defined within the affordable housing policy.
The strategy should allow more than 4,500 houses to the rural areas	The Strategy is to reduce the number of houses to the rural areas and to focus development to the areas with the highest services. Therefore no change will be made to the Core Strategy, however the number of completions within the rural areas will be monitored.
Too many houses proposed for the rural areas	The number of houses proposed for the rural areas is less than historic trends, no change to strategy as the number of houses will be deliverable.
More flexibility required for Policy RA.3 to allow smaller villages to have some growth if needed	More flexibility has been written into the RA.3 policy which allows smaller villages that have not currently got all of the criteria requirements.
Flexibility required to the number of key services needed in policy RA.3	More flexibility has been written into the RA3 policy, which will allow some compensation for those villages that do not currently have all the required key services but have an additional service a an identified community benefit.
Would like Policy RA.4 to consider next generation dwelling for farmers	This is an issue that will be dealt with in the MTRAP, policy RA.4 covers agricultural dwellings. This will be detailed in more depth within the MTRAP.

Would like current service provision in RSCs improved / extended if development goes ahead / receive community benefit also	The policy now allows the RSCs/Hubs to receive an identified community benefit.
Community Stakeholders to be given a greater voice in design and location of any new development	As part of localism the local community will be more involved in what goes on in their village with regards to new developments, this will be taken forward within the MTRAP.
Would like to ensure that housing development does not substantially change the historic identity of a village	This is an issue that will be dealt with in MTRAP.
Ensure infrastructure is in place to deal with additional housing	Infrastructure will be a key part of any development, this will be detailed further within the MTRAP.
Would like the term 'open countryside' to be changed	The term has been changed from open countryside.
Comments made in regards to the matrix information from Appendix 6 (settlement hierarchy background paper)	A re-assessment of the matrix undertaken, and two further hubs were identified, Holme Lacy and Walford.

Summary of responses from Stakeholders

Parish Councils are in majority in support of the preferred option, however they raised concerns about some smaller settlements that just miss the criteria in Policy RA.3 to be allowed some small scale development and ensure there is enough flexibility within the policy to allow this, as it will be beneficial for community benefit. They would also like to ensure that infrastructure will be able to cope with the additional dwellings.

Sport England - Agreed with preferred option but would also like to see that village halls and primary schools could utilise and gain further sports facilities to go towards the community benefit.

Natural England - Agrees with preferred option

Wye Valley and Malvern Hills AONB - Support the policies but would like AONBs to be specifically referred to constraints in RSCs.

English Heritage - Agree with policy options

CPRE - Broadly agree but would like more clarification in the text for RA.3

Any new issues to be considered in MTRAP:

No but further policy development required in the MTRAP.

Any new options to be considered before Submission?

No new options - but some refinement of detailed wording of Policy RA.3, RA.4 and RA.5, and their

Any new evidence required?

No

Question: Do you agree with the preferred policies for Natural and built Heritage Assets	
Summary of Questionnaire responses (from associated report)	
Of the 51 responses received; 56.9% (29) agree / agree with minor 27.4% (14) disagree 15.7% (8) Not response stated	
Summary of free-write questionnaire comments received How addressed in Core Strategy	
<i>While a high percentage of respondents supported the preferred options, a number of issues were raised in the responses.</i>	
1. While the general principles of the policy were supported, doubt existed whether it was possible due to the level of growth.	The evidence base for the growth has been subject to detailed examination. Furthermore the process of identification of strategic sites incorporated examining constraints of sites including those of the natural and built environment. Within rural areas Herefordshire Council accept not all settlements will be able to accommodate the same level of growth due to site specific constraints. The preferred option also provides guidance on mitigating the impact of new development upon natural and built heritage assets. The role of site masterplanning may be a method of outlining and demonstrating appropriate mitigation techniques.
2. Recommended that the policy be divided further with more detailed policies on each natural and built heritage asset.	Local distinctiveness involves a suite of interrelated topics, sub-dividing the policy may lead to a loss in this concept. Furthermore the core strategy should not be a replacement UDP and the preferred option tries to adopt a broader strategic view to guide future developments.
3. Regarding biodiversity, development should be allowed in and adjacent to sensitive areas where mitigation methods are used.	Comments noted and supported by the preferred options policy. Detailed guidance on mitigation is not provided within the core strategy as these may vary on a site-by-site basis.
4. Policy should allow for the improvement or extension to listed buildings or for development on sites of archaeological interest.	Guidance regarding development alterations to or impacting upon heritage assets is covered in PPS5 and the core strategy is not designed to reproduce or reformulate higher level guidance.
5. Greater reference to climate change impacts.	Comments noted, local distinctiveness has a vital role in mitigating the impacts on climate change and the policy will be reviewed to strengthen this aspect.
6. Greater reference to Public Rights of Way especially within urban areas.	PRoW are covered in the green infrastructure chapter of the local distinctiveness section.
7. Greater reference to the historic environment assets of rural settlements.	While Herefordshire Council acknowledge the importance of such assets, site specific issues will be covered within the MTRAP.
8. Specific policy should be contained on AONB as, while protect under national guidance, the Government may streamline policy and remove AONB statutory protection.	AONB is covered in national guidance and there is no indication that the coalition Government wish to see large-scale development within the AONB. Furthermore the policy is based on the ELC principle of all landscapes matter, which, following amendments will be further stressed within the text.
9. Specific reference should be made to PPS15.	PPS15 has been replaced by PPS5.
10. Do not agree with the term sensitivity as this is subjective.	The term sensitivity and areas of greatest sensitivity are within the evidence base repeatedly referenced within the text. However, following comments received, more detailed guidance and reference will be included within the text.

<p>11. Does not agree with the need to build on greenfield sites as this will destroy the Council's character.</p>	<p>Comments noted. However, locating all growth on brownfield sites would lead to high density developments, urban overcrowding and greater congestion within the urban centres, all contrary to the principles of sustainable development. Policies on local distinctiveness are designed to ensure minimal impact of new developments on the Council's character and ensure the assimilate into the existing settlement pattern.</p>
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Summary of responses from Stakeholders

1. Natural England: Does not agree with the preferred options policy. In general greater cross referencing is required between policies and all policies should be based on the three pronged approach of protect, restore and improve.

Comments noted, cross referencing is within the text but more explicit detail will be provided once all policies within local distinctiveness are complete.

NE's views on NH1 – Landscape
Explanation required how applicants and officers determine whether the requirements are met.

Comments noted, however detailed criteria would be contrary to the role of the core strategy as it would become too restrictive.

Use ELC definition.

Comments noted.

Landscape policy should be underpinned by Landscape Character Assessment and Historic Landscape Characterisation. Policy should include criteria such as requirement future development to be well designed, in keeping with its location and sensitive to character of its settings.

Comments noted, specific design policies on these issues are emerging.

The wider purposes of the AONBs should be recognised and their management plans referred to in the supporting text.

Comments noted, however, the role and protection of AONBs is covered nationally and the role of the core strategy is not to repeat national guidance.

Should define what phrases used in the policy, such as "areas in need of restoration".

Comments noted.

NE's views of NH2 – Biodiversity

Title should also include geodiversity.

Comments noted.

Preservation of designated sites already covered in law and national policy. Recommend changing 'preserve and improve' to 'protect, restore and add to'.

Comments noted

'Protect, restore and add to' applies to local sites.

Comments noted

Policy needs to refer to safeguarding species.

Comments noted

"Provide a positive contribution" is already contained within PPS9 and furthermore the criteria only cover preservation and mitigation not enhancement.

Comments noted

The location of where buffer zones are needs to be defined in the policy.

Comments noted, however, the evidence base is referred to within the supporting text.

Connectivity between biodiversity sites is important in relation to climate change adaption and should be highlighted in the text. This is a clear link to G.I.

Comments noted

Reference should be made to Priority Landscape Scale Projects and Landscape for Living.

Comments noted – need to research these projects

<p>2. English Heritage: Does not agree with the preferred options policy</p> <p>General views: Distinctiveness - greater references to aspects that are locally distinctiveness are required rather than just listing designated sites.</p>	<p>Comments noted however the policy does contain reference to non-designated sites of local importance.</p>
<p>EH's views on NH1 – Landscape</p>	
<p>Closer reference to the ELC in terms of positive protection, management and planning of the landscape.</p>	<p>Comments noted – following comments received the policy is to be re-examined and updated to include the ELC</p>
<p>EH's views on NH3 and 4</p>	
<p>Should join the two policies together.</p>	<p>Comments noted – the ability to link the policies together will be examined.</p>
<p>Provide more positive and pro-active policies on how heritage assets can be opportunities rather than policy seeking to control development.</p>	<p>Comments noted.</p>
<p>Link the policy more strongly to the evidence base, such as</p>	
<p>1. Historic Landscape Characterisation.</p>	<p>Landscape characterisation assessment referred to in the supporting text and evidence base.</p>
<p>2. Historic Farmsteads Report.</p>	<p>The role of historic farmsteads can be examined within the MTRAP, however, coalition Government are undertaking a review on similar ideas with proposals due in Autumn 2010.</p>
<p>3. HEDIDs</p>	<p>Initial work undertaken by Herefordshire Council's archaeology department has fed into the LDF, however the overall report has not been made available at the time of writing.</p>
<p>4. Heritage at Risk Register - national register and any local registers.</p>	<p>National register does not show any heritage assets at risk in Herefordshire and there is no local register</p>
<p>5. Local lists – or a commitment to their preparation.</p>	<p>There is no local list and at present no plans to create one.</p>
<p>6. Conservation area appraisals.</p>	<p>Comments noted</p>
<p>Clearer links to other policies specifically the sustainable design policy and PPS5 and PPS1 design policies.</p>	<p>Comments noted, this will be within the sustainable strategic design principles with further guidance to come within the Design Code SPD.</p>
<p>Shropshire have committed to producing a Historic Environment SPD.</p>	<p>At present Herefordshire is not committed to producing a Historic Environment SPD. Locally important heritage assets will be identified through community consultation to inform the MTRAP and HAP.</p>
<p>3. Sport England: no preference stated on the response.</p>	
<p>Policy NH3. should contain details on layout of new developments. Comments noted and the design requirements of new developments will be within the sustainable strategic design policy.</p>	<p>The core strategy is a move away from land-use planning and provides broad strategic guidance on developments. Site specific constraints will be examined within the HAP and MTRAP.</p>
<p>4. Parish and Town Councils: The majority of parish and town councils supported the preferred policies. The issues stated by the parish councils for not supporting the policy are summarised as part of the summary of the free-write questionnaire comments above.</p>	
<p>Any new issues to be considered in HAP or MTRAP:</p>	
<p>Specific design and layout of strategic sites. Natural and built heritage assets within rural areas. Potential implications of central Government policies regarding development within rural areas.</p>	

Any new options to be considered before Submission?

Inclusion of an overarching policy on local distinctiveness, highlighting the interconnectedness of the different facets and identifying AONBs as exemplars.

Comments noted and this could be beneficial in helping to 'set the story' in accordance with CABE guidance.

Any new evidence required?

For the MTRAP work will be required to identify locally distinctive natural and built assets.

Question: Green Infrastructure	
Summary of Questionnaire responses (from associated report)	
Of the 43 comments received; 76.7% (33) agree / agree with minor amendments 18.6% (8) disagree 4.7% (2) not stated	
Summary of free-write questionnaire comments received How addressed in Core Strategy	
<i>While a high percentage of respondents supported the preferred options, a number of issues were raised in the responses.</i>	
1. While the general principles of the policy were supported, doubt existed whether it was possible due to the level of growth.	The evidence base for the growth has been subject to detailed examination. Furthermore the process of identification of strategic sites incorporated examining constraints of sites including those of the natural environment and existing green infrastructure. Within rural areas Herefordshire Council accept not all settlements will be able to accommodate the same level of growth due to site specific constraints. The preferred option also provides guidance on mitigating the impact of new development upon existing green infrastructure and providing new green infrastructure on developments.
2. A number of issues relating to Public Rights of Way, including the need to direct them away from agricultural land and buildings.	Public Rights of Way are protected by national legislation and their improvements are objectives within Herefordshire's Local Transport Plan.
3. Distinguish between wildlife site and recreational areas of green infrastructure.	Green Infrastructure is multi-functional and to separate the policy would be unnecessary as Herefordshire Council are seeking to protect and enhance all forms of green infrastructure. Specific policy within the core strategy will cover open space and recreational provision.
4. Under use of transport infrastructure verges. Comments noted.	Comments noted - the policy will be amended to specifically include reference to transport infrastructure verges within the policy
5. Policy refers to green corridors but details on green non-corridors should be provided.	Comments noted. The evidence base and policy refer to green corridors. Outside of these corridors policies covering the natural and built heritage will apply.
6. Recommend that for strategic sites a Green Infrastructure Framework is provided.	Comments noted and the provision of green infrastructure frameworks within applications is supported but a number of methods to achieve this are available (masterplanning) and site specific requirements will be examined on a site by site basis.
7. Green corridors are not needed within the rural areas.	The green infrastructure corridors in the rural areas contain a number of large infrastructure routes which, through the use of green infrastructure, their impacts can be mitigated. They also contain important heritage and natural resources. Full details on these corridors is referred to in the evidence base which, in accompanying national guidance and protocol, has been placed online for comment since publication in February 2010.
8. Queries why historic parks and gardens are relegated to the district tier.	Designations within the district tier are because the sites are of national or local significance rather than international importance. Furthermore, the County Tier contains relatively larger sites that link into adjoining green infrastructure assets that often cross administrative boundaries. Historic parks and gardens are to be protected by the policy and PPS5.
9. Greater reference to protecting small woodlands and species.	Comments noted and the policy is designed to protect such assets.
Summary of responses from Stakeholders	
1. Natural England: Do not support the preferred options policy General Comments: Need to define green infrastructure. The list of GI objectives does is incomplete and should incorporate other key themes such as landscape, historic environment and the water environment.	Comments noted however a table is within the GI policy providing a range of GI examples. Comments noted however the policy specific states that it should not be read in isolation and other policies on local distinctiveness cover issues regarding landscape and the historic environment while the water environment is stated in the examples of GI.

<p>A GI vision is needed.</p>	<p>This is included in the first paragraph of the section</p>
<p>Should incorporate the ideas and structure on GI as contained within the Coventry City Council submission draft core strategy. GI Policy:</p>	<p>Comments noted, and this will be examined. However, firstly Coventry is a city authority and Herefordshire is a County which limits the ability to transfer over ideas. Secondly the level of detail and content of a core strategy is linked to what further DPDs are proposed. Coventry is proposing an area action plan for the city centre (which has subsequently been withdrawn). Herefordshire Council is proposing a HAP and MTRAP which will provide detailed site specific policies for a much higher number of areas. As such less site specific detail can be contained with HC's core strategy as the vast number of sites to be examined in the HAP and MTRAP will each be affected by their own site specific constraints and opportunities.</p>
<p>Unclear as to what is required by developers.</p>	<p>The policy specifically refers to the requirements of development proposals – failure of development proposals not to follow the criteria without specific justification would be sufficient to refuse an application.</p>
<p>No need to refer to historic environment as this is an integral part of GI.</p>	<p>Comments noted.</p>
<p>Refer to specific local GI assets.</p>	<p>Comments noted, however, the introductory section provides a range of GI assets.</p>
<p>Greater reference to multifunctionality and connectivity.</p>	<p>Comments noted.</p>
<p>Support the inclusion of local site.</p>	<p>Comments noted.</p>
<p>No mention of species within the policy.</p>	<p>Comments noted.</p>
<p>Further clarification required on identified buffer zones and strategic corridors.</p>	<p>Comments noted, buffer zones and strategic corridors are defined in the evidence base as referred to in paragraph 3.4.</p>
<p>Policy will not actually provide any enhancement but merely protect the status quo.</p>	<p>Comments noted, however the policy states the inclusion of new soft landscaping schemes which itself will enhance linkages and connectivity of GI. As stated the policy should not be read in isolation and policies regarding water courses and sustainable water management will be within the core strategy.</p>
<p>2. Sport England: Supports the preferred options policy but would like greater reference to policies on community infrastructure and open space.</p>	<p>Comments noted.</p>
<p>3. English Heritage: No preference stated but could be made more concise by effectively cross-referencing to Green Infrastructure Strategy.</p>	<p>Comments noted.</p>
<p>4. Parish and Town Councils: The majority of parish and town councils supported the preferred policies. The issues stated by the parish councils for not supporting the policy are summarised as part of the summary of the free-write questionnaire comments above.</p>	
<p>Any new issues to be considered in HAP or MTRAP:</p>	
<p>No</p>	
<p>Any new options to be considered before Submission?</p>	
<p>Greater linkages between the open space strategy and policies.</p>	
<p>Any new evidence required?</p>	
<p>No</p>	

Question: Do you agree with the preferred policies for Movement?	
Summary of Questionnaire responses	
50 responses	
Yes - 26 (52%)	
No - 17 (34%)	
N/A - 7 (14%)	
Summary of free-write questionnaire comments received	How addressed in the Core Strategy
Support those elements of the policy that relate to Leominster Southern Relief Road	No action required
More emphasis on bus availability and car parking at rail stations	Will be addressed in HAP and MTRAP
Building a Hereford Relief Road will not solve traffic congestion	No change - the justification for a relief road is contained in the Multi-Modal Model Forecasting Report
Support for proposals to improve public transport provision	No action required
Eastern route would be the best option for a Hereford Relief Road	No change - an eastern route could be successfully challenged both by statutory and non-statutory environmental groups; therefore it would be undeliverable
Support proposal to twin-track the Hereford-Ledbury line	No action required
Promotion of green modes of travel will not help economic growth	A package of transport measures designed to discourage use of the private car is considered appropriate given the demands of the Climate Change Act (2008)
Proposals will be undeliverable due to lack of money	No change - Council has a statutory duty to prepare a Development Plan irrespective of economic conditions
Encouraging walking and cycling as the primary means of travel is unrealistic given the dispersed settlement pattern	Addressed in policy wording
Concerned about the lack of emphasis on rail improvements	Those elements of the policy relating to rail improvements are considered adequate
Not enough emphasis on protecting old railway lines for the sake of green infrastructure	Will be addressed in HAP and MTRAP
Opposed to proposal for Park and Ride on the premise that such schemes run at a loss	No change - blend of transport measures is required

Summary of responses from Stakeholders	
Highways Agency - Unable to make specific comments at this stage	No action required
AONB Unit - Policy could be strengthened by including reference to transport for tourism and recreational purposes	Comments noted
West Mercia Police - Insufficient information provided in supporting text	Justification for the policy is sufficient
CPRE Herefordshire - Opposed to the proposed Hereford Relief Road	No change - the justification for a relief road is contained in the Multi-Modal Model Forecasting Report
Natural England - Misgivings regarding the proposed Hereford Relief Road and concerned about the lack of reference to climate change.	The justification for a relief road is contained in the Multi-Modal Model Forecasting Report. Climate change is now addressed in the policy wording
English Heritage - Unable to comment on the potential impact of the Hereford Relief Road on	No action required
Sport England - To achieve greater uptake of walking and cycling, hygiene facilities must be	Will be addressed in HAP and MTRAP
Town/Parish Councils - Support the proposal to explore whether there is any scope to twin track	No action required
Any new issues to be considered in HAP or MTRAP:	
<p>Car parking at transport interchanges</p> <p>Protection of disused railway lines for green infrastructure</p> <p>Hygiene facilities in public places</p>	
Any new options to be considered before Submission?	
None. However, refer to climate change in the supporting text. Delete reference to encouraging walking and cycling as the primary means of travel (unrealistic given the dispersed settlement pattern)	
Any new evidence required?	
Viability study	

Question: Waste	
Summary of Questionnaire responses (from associated report) Agree = 82% (23) Disagree = 18% (5) (including those with no reason given or raising matters outside the scope of the policy) Total = 28	
Summary of free-write questionnaire comments received	How addressed in Core Strategy
Domestic recycling is important - more emphasis should be placed on that	This is already a feature of the Council's Waste Strategy and is covered in there
Objections to the use of incinerators on principle	No incinerators are proposed as part of the policy. A "Blanket ban" on them would not be appropriate in any case.
Policy W4 should be widened to consider not just Anaerobic digestion	Policy wording changed to address this point
Objection to the proposed installation at Hartlebury (in Worcestershire)	Herefordshire Council cannot have policies for the determination of development proposals in another authority.
Support for Energy-from-waste in principle.	
Summary of responses from Stakeholders No significant objections from stakeholders - but significant support	Some minor text changes made to cover detailed points.
Any new issues to be considered in HAP or MTRAP: none - but further policy development will be required in the Minerals and Waste DPD	
Any new options to be considered before Submission? no new options - but some refinement of detailed wording of policy W4	
Any new evidence required? no	

Question:Minerals	
Summary of Questionnaire responses (from associated report) Agree/agree with minor changes = 82 % (18) Part Agree/part disagree = 14% (3) Disagree - no reason given = 4% (1) Total = 22	
Summary of free-write questionnaire comments received	How addressed in the Core Strategy
Concern that views of local people need to be taken into account.	Environmental impacts are an intrinsic part of the assesement of minerals developments.
Summary of responses from Stakeholders	
Concern over use of "Historic" sites - term not adequately described for the benefit of stakeholders.	Policy wording amended to avoid this term.
Concern that energy minerals not fully considered,	Policy wording amended to be inclusive of energy minerals (which will be covered in MSAs anyway)
Suggested alternative apportionment figures	Apportionment figures will need to be addressed in the Minerals and Waste DPD - they cannot be addressed before then due to significant changes in governance arrangements for what was formerly the regional bodies.
Concern at lack of full survey data	Individual sites will have to be surveyed by would-be developers. The BGS anticipated schedule of surveys is not within the control of the Council
Support for policy on secondray aggregates	noted
Any new issues to be considered in HAP or MTRAP: none - but the definition of the MSAs and review of apportionments need to be taken forward in the Minerals and Waste DPD (already proposed in the policy)	
Any new options to be considered before Submission? no	
Any new evidence required? not at this stage	

Question:Employment provision	
Summary of Questionnaire responses (from associated report)	
Agree/agree with minor changes = 24 (80%) Disagree = 4 (13.3%) Undecided = 2 (6.7%) Total = 30	
Summary of free-write questionnaire comments received	How addressed in the Core Strategy
Develop Hereford City Centre, and forget the ESG.	The Core Strategy policy on Hereford City will address this issue.
Allow some employment development in villages where necessary	The availability of employment land has been identified through the 2009/2010 employment land study. Where any shortfall has been identified, more detailed policies will be developed as part of the Hereford City, market towns & rural areas plans.
There are already numerous small and medium sized trading estates with a variety of businesses. However their facilities need to be vastly improved.	The availability and quality of employment land has been identified through the 2009/2010 employment land study. Where any shortfall has been identified, more detailed policies will be developed as part of the Hereford City, market towns & rural areas plans.
Freehold land is required urgently	The availability and quality of employment land has been identified through the 2009/2010 employment land study. Where any shortfall has been identified, more detailed policies will be developed as part of the Hereford City, market towns & rural areas plans. Whether or not land is designated as Freehold, is outside of the remit of Core Strategy policy.
Need to be more self sufficient in food. Need more place for permaculture.	The Core Strategy policy on the economy highlights the need to continue development in traditional sectors such as the food and drink industries. The policies of the Core Strategy aim to facilitate development in the most sustainable manner possible. The policy on the economy states that innovative changes in agriculture will be supported where they assist in maintaining the viability of farming and other supporting rural businesses, and where they do not have an adverse impact on the environment.
The Council should find work for all able bodied people on benefits, at the national minimum hourly rate.	This is outside the remit of planning policy.
Growth is no longer morally possible on a planet of overused and dwindling resources. Need to take seriously, the fact that the SA has found that the promotion of new business would negatively impact on emissions, the consumption of raw materials and would increase the need for new build.	The Core Strategy policies aim to facilitate any needed growth through the most sustainable means as possible. This includes the use of renewable resources, sustainable design, and methods which reduce CO2 emissions. The Core Strategy policy on the economy specifically refers to the reuse of existing buildings where possible.
As far as possible locate new employment near housing.	This comment is noted. New growth areas are decided upon, where both housing and employment can be facilitated.
Developers should have to prove why they cant develop in brownfield areas that already have spare capacity.	The reuse of existing buildings and sites is supported under the Core Strategy policy for the economy.
Summary of responses from Stakeholders	
Any new issues to be considered in HAP or MTRAP: No new issues identified	
Any new options to be considered before Submission? No new options identified.	
Any new evidence required? None at present	

Question:Employment supply	
Summary of Questionnaire responses (from associated report) Agree/agree with minor changes = 23 (74.2%) Disagree = 4 (12.9%) Undecided = 4 (12.9%) Total = 31	
Summary of free-write questionnaire comments received	How addressed in the Core Strategy
Areas such as Rotherwas seem to have plenty of land – policy should look at using this	The quantity and quality of employment land in the county has been indentified through the 2009/2010 employment land study. This evidence will form the basis for policy development.
There is considerable unused capacity in Leominster, Moreton-on-Lugg and Rotherwas. There is no necessity for further employment land.	The quantity and quality of employment land in the county has been indentified through the 2009/2010 employment land study. This evidence will form the basis for policy development.
More good sized plots are urgently required.	The availability of employment land has been identified through the 2009/2010 employment land study. Where any shortfall has been identified, more detailed policies will be developed as part of the Hereford City, market towns & rural areas plans.
Growth is no longer morally possible on a planet of overused and dwindling resources. Need to take seriously, the fact that the SA has found that the promotion of new business would negatively impact on emissions, the consumption of raw materials and would increase the need for new build.	The Core Strategy policies aim to facilitate any needed growth through the most sustainable means as possible. This includes the use of renewable resources, sustainable design, and methods which reduce CO2 emissions. The Core Strategy policy on the economy specifically refers to the reuse of existing buildings where possible.
Summary of responses from Stakeholders	
West Mercia Police: Employment development growth will place additional pressures on emergency services that will require mitigation.	The functionality of emergency services is outside the remit of Core Strategy policy. The Infrastructure Delivery Plan will deal specifically with any need for additional or increased services.
Any new issues to be considered in HAP or MTRAP: No new issues identified.	
Any new options to be considered before Submission? No new options to be considered.	
Any new evidence required? None at present.	

Question: Do you agree with the preferred policies for affordable housing?	
Summary of Questionnaire responses (from associated report)	
58 responses	
Yes - 27 (47%)	
No - 20 (34%)	
N/A - 11 (19%)	
Summary of free-write questionnaire comments received	How addressed in the Core Strategy
Smaller targets for rural settlements in and around Leominster	No change - justification for preferred options is contained affordable housing viability study
Target for Leominster should be raised to 30%	No change - justification for preferred options is contained in affordable housing viability study
Smaller targets for Bromyard, Ledbury and Ross-on-Wye	No change - justification for preferred options is contained in affordable housing viability study
Target of 40% for Ross will compromise the viability of many housing schemes	No change - justification for preferred options is contained in affordable housing viability study
Policy will lead to the provision of affordable housing in open countryside	Addressed in criteria based policy on housing outside RSCs and Hubs
Not convinced that policy will deliver affordable housing in the best locations	Will be addressed in MTRAP
Best solution would be to build more houses	No change - meets with spatial strategy
Likely reduction in housing grants will make the targets unachievable	No change - Council has a statutory duty to set targets for the provision of affordable housing in its Development Plan irrespective of economic conditions
Threshold for affordable housing is too low	No change - justification for preferred options is provided by affordable housing viability study

Summary of responses from Stakeholders	
Advantage West Midlands - Disappointed by the failure to mention the Rural Affordable Housing Programme in supporting text	Comments noted
AONB Unit - Concerned that the continuation of the policy on rural exception sites will harm the AONBs	Addressed in criteria based policy on housing outside RSCs and Hubs
NFU - Reducing the site size threshold for affordable housing in rural areas could affect the viability of affordable housing schemes.	No change - justification for preferred options is provided by affordable housing viability study
Parish/Town Councils - Of those Parish and Town Councils who responded to this question, the site size threshold for rural areas is considered to be too low. One Town Council	No change - justification for preferred options is contained in affordable housing viability study
Any new issues to be considered in HAP or MTRAP:	
None	
Any new options to be considered before Submission?	
None	
Any new evidence required?	
None	

Question: Gypsy and Traveller sites	
Summary of Questionnaire responses (from associated report)	
Of the 35 comments received; 21 agree with the policy (60.0%) 10 disagree with the policy (28.6%) 4 stated no preference (14.4%)	
Summary of free-write questionnaire comments received How addressed in Core Strategy	
<i>While a high percentage of respondents supported the preferred options, a number of issues were raised in the responses.</i>	
1. Do not agree with the need for more pitches especially with an under occupation with existing pitches.	The GTAA does state the reasons for under-occupancy of existing pitches (design, vandalism, crime, poor accessibility). The GTAA requirement is on top of existing pitch levels and Herefordshire Council has a statutory duty to meet the needs of the Gypsy and Traveller community.
2. The Gypsy and Traveller community should integrate with the settled community.	Comment noted, the location of future pitches will be in areas of close proximity of existing service provision allowing for easier integration into the wider community. The 5km threshold is based on national transport and movement guidance and represents rural accessibility thresholds.
3. Members of the G and T communities should accord to general planning laws.	Once the need had been met, Gypsy and Traveller pitch provision will be subject to planning policies on development in the open countryside as stated in the preferred options policy
4. The development of new pitches need to be carefully controlled.	Comments noted, the development of pitches will be subject to the criteria within the policy and wider design principles.
5 Reference to options in another document that we do not have at the time we are reviewing this document is unacceptable.	The GTAA has been available for public comment since 2008. The document does not put forward options for meeting this need as it is a statutory, not optional, requirement of local authorities to meet the needs of the Gypsy and Traveller Community.
6. Queries whether the site at Shobdon rock is deemed a tolerated site.	While site specific issues are to be examined within the MTRAP, the Annual Monitoring Report 2008/2009 states that this site has been in occupation for over 10 years and would therefore be exempt from enforcement action. Herefordshire Council's planning enforcement department has undertaken an expediency report on this site.
Summary of responses from Stakeholders	
Parish and Town Councils: While the majority supported Herefordshire Council's preferred options policy, representations were received disagreeing with policy. Those comments are covered above in the summary of free-write questionnaire	
Any new issues to be considered in HAP or MTRAP:	
Impacts of emerging new national guidance to replace circular 01/2006 (ODPM) - Planning for Gypsy and Traveller Caravan	
Any new options to be considered before Submission?	
Impacts of emerging new national guidance to replace circular 01/2006 (ODPM) - Planning for Gypsy and Traveller Caravan	
Any new evidence required?	
Impacts of emerging new national guidance to replace circular 01/2006 (ODPM) - Planning for Gypsy and Traveller Caravan	

Question: Do you agree with the preferred policies for Open Space, Sport and Recreation?	
Summary of Questionnaire responses (from associated report)	
37 responses	
Yes - 29 (78%)	
No - 7 (19%)	
N/A - 1 (3%)	
Summary of free-write questionnaire comments received	How addressed in the Core Strategy
Concerned that the policy will change once the Playing Pitch Strategy is published	Playing Pitch Strategy is required by PPG17
Policy should include references to cultural activities	Addressed in general policy on social and community infrastructure
PROWs and cycle paths should feature more prominently	Addressed in general policy on movement
Summary of responses from Stakeholders	
AONB Unit - Policy could be strengthened by referring to the importance of green infrastructure	Addressed in general policy on green infrastructure
Natural England - Policy needs to make clear that delivery of open space will be required, not just supported	No change - Under the provisions of Circular 05/05 developers are only required to provide the infrastructure necessary to allow the development to proceed.
English Heritage - Why not combine this policy theme with Green Infrastructure?	Comments noted
Sport England - Policy does not comply with PPG17 or Sport England policy because evidence is either missing or out-of-date	To be addressed through preparation of a Playing Pitch Strategy
Parish/Town Councils - Of those Parish and Town Councils who responded to this question, there were calls for greater emphasis on the role that PROWs have in promoting health, tourism etc. One Town Council strongly supports the preferred option	Addressed in general policy on movement

Any new issues to be considered in HAP or MTRAP:

None

Any new options to be considered before Submission?

Combine policies on Open Space, Sport and Recreation with those on Green Infrastructure

Any new evidence required?

Playing Pitch Strategy

Question: Do you agree with the preferred policies for Social and Community Infrastructure?	
Summary of Questionnaire responses (from associated report)	
41 responses	
Yes - 32 (78%) No - 4 (10%) N/A - 5 (12%)	
Summary of free-write questionnaire comments received	How addressed in the Core Strategy
Proposal for a university gateway at Hereford is unrealistic	No change - the Council is already committed to HE provision, which is intrinsic to economic growth
Acknowledge that there are two theatres in operation	Addressed in policy wording
Clarify the meaning of the term 'University Gateway'	Will be clarified in Glossary of Terms
Give greater emphasis to places of worship and associated community facilities	Addressed in policy wording
Summary of responses from Stakeholders	
AONB Unit - Scope for improving green infrastructure and walking and cycling routes	Addressed in general policies on green infrastructure and movement
West Mercia Police - Encouraged to see the inclusion of police and fire services as social infrastructure	No action required
Natural England - Confused about the purpose of the policy	Addressed in supporting text
NFU - Considers Policy SC1(2) to be unlawful by virtue of section 122 of the Community Infrastructure Levy Regulations (2010)	Policy SC1(2) removed
English Heritage - Welcomes the recognition that heritage and archaeology can be part of social and community infrastructure	No action required
Parish and Town Councils - General support for the policy amongst all respondents	No action required

Any new issues to be considered in HAP or MTRAP:

None

Any new options to be considered before Submission?

Amend Policy SC1(2) as appropriate

Any new evidence required?

None

Question:Economy	
Summary of Questionnaire responses (from associated report)	
Agree/agree with minor changes = 36 (61.0%) Disagree = 21 (35.6%) Undecided = 2 (3.4%) Total = 59	
Summary of free-write questionnaire comments received	How addressed in the Core Strategy
I fail to see reference to the heritage sector industries. I also see no acknowledgement of the role that Hay-on-Wye plays within the economy of the Golden Valley area. Hay carries a special case as it is physically so close and has a profile and market place of its own which has an impact on Herefordshire.	We are unable to include criteria in Core Strategy policy to guide development in an area outside of the county. Hay-on-Wye is outside the remit of Herefordshire Council's planning control. Heritage issues will be dealt with more specifically within the tourism policy, however heritage sector industries have now been referenced as part of the policy wording.
Don't just provide jobs in agriculture. Need to provide homes for people who work in the county. Ensure farmers make proper use of land.	The 2009/2010 employment land study identifies employment land in a range of areas throughout the county. This will allow for a range of employment types, to include live/work. The planned urban extensions will allow for a range of homes to include affordable housing. The use of farmland is not within the remit of the strategic level Core Strategy Policy.
Stop losing employment land to housing development.	The 2009/2010 employment land study identifies employment land in a range of areas throughout the county. These sites have been assessed in terms of their quality, and only those sites deemed to be poor quality will be released (if appropriate) for housing development.
'Evidence base' is selective and therefore the conclusions are optimistic and inappropriate.	Evidence base studies provide the basis from which decisions can be made. The conclusions made in such studies therefore, can be taken into consideration; while ensuring that any decisions made are appropriate to the local area.
Don't close tourist offices and encourage investment by small businesses.	The closure of tourist offices are outside the remit of Core Strategy policy. The Core Strategy aims to encourage tourism opportunities throughout the county.
Include reference to improving and increasing tourism accomodation.	The need to retain existing, and encourage the development of new tourism accomodation, is dealt with under policy EC.2 - Tourism.

Sustainable economic growth is not defined.	Addressed in the Core Strategy through changes to text.
Hereford needs better trunk roads to support national distribution.	Herefordshire Local Transport Plan will look at the county's priorities in terms of investing in transport. Policy M.1 - Movement of the Core Strategy, will also look at facilitating improvements to the strategic and local highway networks.
The policy does not go far enough to support the rural economy.	The rural economy is considered under specific rural areas policies which can be found in the Preferred Options: Rural Areas paper.
The policy is ambiguous and lacking in detail.	More detailed policies will be developed as part of the Hereford Area Plan, and the Market Towns and Rural Areas Plan.
Object to limited explanation of the LEP.	This will be included as part of the overall Glossary.
Need to summarise the main points of the Economic Development Strategy.	Supporting text amended.
What is the largest employment sector in the county?	Supporting text amended to define this.
Define 'sustainable tourism.'	Supporting text under the Tourism policy (EC.2) has been amended to define this.
Define 'highest quality employment land.'	Supporting text amended to define this.
The criteria used to determine 'appropriate levels of development' must be set out.	This will be determined as part of the lower tier plans - the Hereford Area Plan, and the Market Towns and Rural Areas Plan.
Need to mention the 'Rights of Way' network in the policy.	Supporting text amended to expand on this. Policy M.1 - Movement will look at this issue.
The policy lists many issues to be addressed however is lacking in detail on how this will happen.	This policy forms part of the overarching Core Strategy. More detailed policies will follow as part of the lower tier area plans.
To develop sustainable tourism, provide bike hire in Hereford and improve rail connections. Especially Pontrilas, Tram Inn, Withington. Dual tracking between Ledbury and Malvern.	Sustainable transport will be looked at in more detail under the Policy M.1 - Movement.
Not appropriate to encourage a large department store or another supermarket in Hereford City.	The Retail Strategy was considered under the UDP. Due to the loss of shoppers from Hereford City to other nearby towns and cities; the strategy arrived at the conclusion that the development of large anchor stores in the city was necessary in order to avoid this out-migration of expenditure.
Do not need growth, only limited re-generation to ensure enough workers and jobs for the existing land/natural resources. Build on roll-out of broadband, go for green jobs.	The need for growth in the county is looked at as part of the overall strategy for the county, and is therefore not dealt with under this policy.

Need to highlight the importance of agriculture as food security becomes important but it has to be labour intensive and remuneration should be comparable to other occupations. Yes to green businesses and renewable energy.	The need for farm diversification and agriculture will be considered in more detail under the policies for the rural economy. The move towards the use of renewable energy is looked at under Policy EN.1 - Renewable Energy.
Housing proposals will not necessarily improve economic prosperity of the county. County's strengths are the land and biodiversity and farming – need to focus on strengths.	Housing proposals are put forward as a result of housing need. The strengths of the county will be supported; for example in the case of agriculture, as part of the policies on the rural economy. Biodiversity issues are looked at a strategic level under Policy GI.1 - Green Infrastructure. More detailed policies will be formed as part of the lower tier area plans.
Importance of tourism is not reflected adequately in EC1.	Tourism is dealt with specifically under Policy EC.2, and as part of the policies on the rural economy.
County infrastructure and economic development are closely associated and solutions to problems should be considered together.	The Infrastructure Delivery Plan will look at the issues of infrastructure in more detail.
Retail development should be focussed through the improvement to the existing centre.	The Core Strategy policy on Hereford City will address this issue.
To develop sustainable tourism, provide sustainable means of transport.	Policy M.1 - Movement will look specifically at the need for sustainable transport.
Summary of responses from Stakeholders	
Barclays Bank: Lack of policies on retailing is a serious omission.	Policies on retail will feature as part of the Hereford Area Plan and Market Towns and Rural Areas Plan. A retail impact assessment will also feature as part of these plans.
Employment developments place increasing demand on the emergency services and so should make contributions to mitigate the impacts they have on social infrastructure.	An Infrastructure Delivery Plan will be prepared to consider the need for contributions.
Theatres Trust: Current provision of venues for cultural activities should be protected and enhanced. New facilities should be of highest quality.	This subject will be dealt with in more detail as part of the policy on tourism, and is also included as part of the policies on the rural economy. The provision of new facilities would be considered as part of the lower tier area plans.
English Heritage: Data on the current use of farmsteads could be of use in expanding the supporting text.	This subject will be dealt with in more detail as part of the policies on the rural economy, and subsequently as part of the Market Towns and Rural Areas Plan.
CPRE: Proposed additional wording to the end of criterion 3.	Comment noted and text reworded.

<p>Malvern Hills AONB: Like to see AONBs developed as exemplar projects for both movement of residents and visitors. High quality tourism, cultural and leisure developments would be supported when sensitive to the primary purpose of AONBs.</p>	<p>Policy EC.2 - Tourism, recognises the high quality of the Herefordshire landscape as a key visitor attraction - in terms of enjoyment of the countryside. Policy EC.2 states that such tourism will be supported where it will not have a detrimental impact on environmental assets and designations.</p>
<p>Natural England: Point 1 should be amended to recognise the need for high design standards. Food and drink production requires large amounts of water, therefore this policy may have to be amended in line with recommendations emerging from the HRA in order to safeguard the River Wye SAC. The monitoring indicators suggested are limited in scope, additional indicators around the delivery of live/work units and supply of broadband would give a broader understanding of the success of the policy.</p>	<p>The need for high quality design will be looked at specifically under Policy EQ.2 - Sustainable Strategic Design. Furthermore a Design Code SPD will be developed, in order to guide design throughout the county. The results of the HRA will be taken into consideration as soon as they become available, and where necessary, amendments made. Additional indicators have been added, in order to monitor the delivery of live/work units and broadband coverage.</p>
<p>Any new issues to be considered in HAP or MTRAP: No new issues identified</p>	
<p>Any new options to be considered before Submission? No new options to be considered.</p>	
<p>Any new evidence required? Not at this time</p>	

Question: Sustainable Strategic Design	
Summary of Questionnaire responses (from associated report)	
41 Agree / Agree subject to minor amendments (71.9%) 11 Disagree (19.3%) 5 Not stated (8.8%)	
Summary of free-write questionnaire comments received	How addressed in Core Strategy
<i>While a high percentage of respondents supported the preferred options, a number of issues were raised in the responses.</i>	
1. All builders should build to the same standard	The policy is applicable to all development by all builders.
2. Concerns raised about the loss of greenfield sites, previously developed land should be a priority.	Herefordshire Council are prioritising development on previously developed land. However, the development required to meet local needs cannot be met solely through developing previously developed land and the local distinctiveness section is seeking to ensure the most sensitive greenfield sites are protected.
3. Garden grabbing should be abolished	National Government have amended the rules on garden grabbing giving local authorities the ability to refuse permission where appropriate.
4. Wish to see zero carbon housing	Code for Sustainable Homes is introducing zero carbon homes in 2016 and the policy is following national standards
5. Queries over the density figure within the text.	The density figure is a guideline and details are contained explaining this. Furthermore the site specific DPDs and Design Code SPD will examine appropriate design and densities of development.
6. Not ambitious enough and cycle and bus routes are a must throughout the County.	The criteria cover all development across the County and are based on evidence and good practice guidance. More stringent design criteria may negatively impact the deliverability and feasibility of schemes, further exacerbating current issues. Further guidance will be contained within the site specific DPDs and Design Code SPD.
7. Not possible with the level of growth proposed.	The evidence base for housing figures were subject to independent Examination in Public and found to be sound and robust. The design policy is applicable to all developments and should an proposal not accord with the criteria then the application will be refused unless material considerations state otherwise.
8. The social and environmental costs to the development west of Hereford will be huge.	The Sustainability Appraisal of the Core Strategy (incorporating the Strategic Environmental Assessment) is examining the impacts of the policies and is available for comment.
9. The policy will not meet reduction targets in levels of carbon dioxide	The policy is supportive of national targets to reduce energy levels in new households and development proposals are to follow national standards.
10. Parking principles are insufficient and do not meet current demands	The Core Strategy is seeking to promote more sustainable methods of movement and transportation than reliance on private motorised transport.
Summary of responses from Stakeholders	
Parish and Town Councils. Comments queried the housing figures. Two comments disagreed with policy stating it was ambiguous and lacking in specific detail.	The evidence base for housing figures were subject to independent Examination in Public and found to be sound and robust. The design policy is applicable to all developments and should an proposal not accord with the criteria then the application will be refused unless material considerations state otherwise. Site specific detail is to be examined within the HAP, MTRAP and Design Code SPD. The core strategy policy is designed to provide a set of strategic criteria to ensure all new developments are designed in the most sustainable methods.

Woodland Trust: No definitive answer provided but wish to see greater recognition to the importance of green space.	Comments noted and the Core Strategy supports and recognises the importance of green space and this is included within the local distinctiveness section through policy on green infrastructure as well as further policies on open space, sport and recreation.
Coal Authority: No definitive answer provided but wish for the inclusion of land stability reclamation	Comments noted and will be taken forward in the core strategy
West Mercia Police and Hereford and Worcester Fire and Rescue: No definitive answer provided but wish for fire protection and crime prevention to included within development proposals from the outset.	Comments noted and the Core Strategy supports the principles and will be take them forward in the core strategy
AONB Management Boards: AONBs should be seen as exemplars and would like to see Government targets (BREEAM, CfSH) within the policy.	Comments noted and AONBs are awarded national protection through other legislation which the Core Strategy supports. Development proposals are expected to accord with national targets but including them in the policy is problematic as if Government alter targets then the policy is out of date and requires review.
Environment Agency: Would like to see Government targets (BREEAM, CfSH) within the policy.	Development proposals are expected to accord with national targets but including them in the policy is problematic as if Government alter targets then the policy is out of date and requires review.
English Heritage: Broadly welcomes the overall approach. Wish to see reference to re-use of existing buildings alongside the re-use of previously developed land. Also the last two indicators require further development.	Comments noted. The indicators are currently being reviewed. The policy does support the re-use of existing buildings in sustainable locations and will be amended to explicitly reference this.
Natural England: Do not support the preferred policy for design. Greater reference and linkages should be made to the natural environment. Water issues should be included within the policy. Property could be more aspirational with regard to on-site energy provision. Definition of design code needed in glossary.	Comments noted. Part 1 of the preferred policy seeks development to be designed respecting the surrounding character, both natural and built. Water impacts are development requirements are set out in the water policy which the design policy refers to. On-site energy creation may impact feasibility and viability of necessary development and as such the policy supports and follows national guidance.
Herefordshire Friends of the Earth: Agrees with the policy	
Dwr Cymru Welsh Water: Agrees with the policy	
E.on: Agrees with the policy	
Any new issues to be considered in HAP or MTRAP:	
Specific design issues / styles of differing areas. Identification of site specific locally distinctive assets such as local heritage assets.	
Any new options to be considered before Submission?	
No	
Any new evidence required?	
No	

Question: Tourism	
Summary of Questionnaire responses (from associated report)	
Agree/agree with minor changes = 75% (15)	
Disagree = 15% (3)	
Undecided = 10% (2)	
Total = 20	
Summary of free-write questionnaire comments received	How addressed in the Core Strategy
The role of music in the county's tourism economy needs to be promoted. There is also great potential for developing the use of church buildings for tourism. Other tourism areas in addition to that of food and drink need to be promoted. Policy should include supporting the development of tourist attractions as well as accommodation.	The Core Strategy policy on tourism will look to support a wide range of tourist activities throughout the county. The policy specifically refers to maintaining existing and encouraging new tourist accommodation.
Allow for tourists to use their cars	The Core Strategy policy on movement will address transport issues.
Keep the existing city centre, but refurbish it.	The Core Strategy policy on Hereford City will address this issue.
Would benefit from an increase in museums, heritage centres, historic buildings, exhibitions and other cultural facilities to retain visitors for longer stays.	The Tourism policy recognises the need for tourism development, and states that it will facilitate tourism by encouraging new accommodation and attractions throughout the county, to help to diversify the tourist provision - through capitalising on the county's assets.
Encourage development of B&B's and Guest Houses at village level	The Core Strategy policy specifically refers to maintaining existing and encouraging new tourist accommodation.
Absence of a definition of sustainable tourism and lack of criteria that will be used to determine how sustainable tourism is.	Sustainable tourism has been defined within the supporting text. This is an overarching strategic policy, therefore criteria will be considered when developing the lower tier local area plans.
Discourage day-trippers. Encourage new attractions in other parts of the county.	Day tourism provides a significant contribution to the local economy. The Core Strategy policy on tourism will look to support a wide range of tourist activities throughout the county.
Would like to see PROW added as a further asset to be capitalised on.	This is detailed as part of the explanatory text in the Economy section. PROW will be looked at in more detail under Policy M.1 - Movement.
Policy should make specific reference to tourist development in rural areas.	Tourism in rural areas will be looked at in more detail as part of the policies on the rural economy.

Improved rail links and other public transport/walking and cycling networks is essential.	This issue will be looked at under Policy M.1 - Movement.
The River Wye is a greatly neglected potential as	The policy recognises the need to capitalise on the county's natural and heritage assets.
The visiting of heritage places, farms and is not considered.	Policy text now incorporates reference to encouraging heritage tourism by facilitating the development of long distance walking and cycling routes and heritage trails. Farm diversification will be looked at under policies for the rural economy. The policy text now incorporates reference to recognising the high quality of the Herefordshire countryside as a key visitor attraction and the location for smaller scale tourist development - based on the enjoyment of the countryside.
Need to insert text to state that tourist information services and facilities will be supported.	Tourist information facilities are outside the remit of planning. Tourism in general will be supported under the Core Strategy policy on Tourism, and through the policies which deal specifically with the rural economy.
The policy lacks in detail that is critical to carry out any initiative.	This policy forms part of the overarching Core Strategy. More detailed policies will follow as part of the lower tier area plans.
'Significant tourist accomodation' focussed in Hereford is not consistent with the high carbon cost of tourism in rural areas.	The Core Strategy policy refers to maintaining existing and encouraging new tourist accomodation. This will be on a county-wide basis.
Summary of responses from Stakeholders	
Hereford Access for All: Would like to see more use made of trams and the canal.	The Core Strategy policy on movement will address transport issues. The Infrastructure Delivery Plan will look in detail, at a wide range of infrastructure issues.
Bourne Leisure: EC.2 should make specific reference to recognising the need for listed buildings and their settings to be improved, altered and extended to enable their use for sustainable tourism. Reference should be made to improving accomodation, as well as retaining it. Need to recognise that at times there is no alternative than to use the car.	Listed buildings are dealt with under specific national legislation on listed buildings. Improving tourist accommodation falls outside the remit of Core Strategy strategic policy. The policy recognises the need for sustainable transport, while Policy M.1 - Movement looks at transport in more detail.
Theatre Trust: Amend title of policy to include Leisure, to avoid confusion.	Leisure issues are dealt with under Policies OS 1-3: Open Space, Sport and Recreation.

Transition Hay-on-Wye: Where are the dedicated cycle routes and bus routes? Park and ride needed to visitor attractions. Links to farm diversification.	The Core Strategy policy on movement will address transport issues. The Infrastructure Delivery Plan will look in detail, at a wide range of infrastructure issues. The rural economy to include farm diversification, will be looked at under separate policies dealing specifically with the rural economy.
Herefordshire Local Access Forum: Add to the end of criterion 2, that the existing PROW will be maintained.	Policy text reworded.
Malvern Hills/Wye Valley AONB: Suggested text change to specify AONBs. Recognise that tourism within AONBs must be sustainable.	The policy text has been changed to add 'does not have a detrimental effect' as suggested. The policy refers to 'Environmental Designations,' which will include AONBs.
CPRE: suggested rewording of policy text.	Text reworded as suggested.
Natural England: NE wishes to see the AONB promoted as exemplars of sustainable transport and tourism, we would support a reference to this in the policy.	The policy recognises the high quality of the Herefordshire countryside as a key visitor attraction and the location for smaller scale tourist development - based on the enjoyment of the countryside. Policy LD.1 - local distinctiveness specifically refers to the AONBs as being exemplars of local distinctiveness, with their adopted management plans as material for future development proposals.
Any new issues to be considered in HAP or MTRAP:	
No new issues have been identified.	
Any new options to be considered before Submission?	
No new options at this time.	
Any new evidence required?	
No	

Question:Sustainable water management	
Summary of Questionnaire responses (from associated report) Agree/agree with minor changes = 41 (77.4%) Disagree = 10 (18.9%) Undecided = 2 (3.8%) Total = 53	
Summary of free-write questionnaire comments received	How addressed in the Core Strategy
A clearer assessment of flood risk areas is needed	The Core Strategy SFRA provides a detailed study of flood risk areas in the county. This information will be used when developing policy.
Adequate sewage treatment ensured before new building takes place. New buildings should incorporate rain-water harvesting.	A design code will be prepared as a Supplementary Planning Document to provide baseline standards for design across the whole county. This will expand on the Core Strategy policy on Sustainable Strategic Design.
A large agricultural development would have runoff problems which have not been considered.	Only those proposals that result in planning applications can be controlled.
The plan to build more homes in the county is not sustainable given the water shortages we are likely to face.	The proposal for new homes is based on housing need. The implementation of these developments will strive towards water neutrality, through water conservation and sustainable drainage measures. The Water Cycle Study which forms part of the Core Strategy evidence base, states that there is enough water available to allow for the level of planned housing development.
No new housing in floodplains.	The Core Strategy SFRA provides a detailed study of flood risk areas in the county. This information will be used when determining planning applications for housing development.
Consider the use of wetland sewage disposal.	The policy considers sustainable drainage measures, whatever type these may be.
Summary of responses from Stakeholders	
River Lugg Internal Drainage Board: A Flood Risk Assessment is needed for all developments within the Board's area to ensure the proposals are not at risk, or that they do not increase the flood risk to adjacent plots. Request a written Land Drainage consent from the board if the proposals change an existing drainage system (e.g. increased surface water runoff) under the terms of the Land Drainage Act 1991.	Comment noted. Developers will need to clearly demonstrate that surface water management issues will be managed as part of the development process in Herefordshire; and as a means to support this, further guidance on the design of sustainable developments, to include surface water management and water efficiency will be provided in Herefordshire Council's Design Code Supplementary Planning Document. The need for written land drainage consent will be dealt with through the planning application process.

Herefordshire Friends of the Earth: Remove the word 'appropriate' from criterion	This wording has been taken from our evidence base - where it is deemed that in some instances achieving a reduction in run-off rate may not be appropriate.
Boughton Butler Consulting: Policy wording - criterion 5 too weak.	This criterion has been reworded as suggested.
Hereford Diocese Board: The policy does not express sufficient flexibility with respect to development in flood risk areas. LPAs should look favourably on well founded development in areas of flood risk, subject to the implementation of appropriate mitigation measures.	National guidance - PPS25 states that a risk-based approach should be adopted at all levels of planning; and that a sequential risk-based approach to determining the suitability of land for development in flood risk areas is central to the policy statement and should be applied at all levels of the planning process.
The policy lacks in detail that is critical to carry out any initiative.	This policy forms part of the overarching Core Strategy. More detailed policies will follow as part of the lower tier area plans.
Woodland Trust: Insert a new criterion to 'pursue active land use management...'	Active land use management is considered now as part of the policy, and within the supporting text.
Malvern Hills/Wye Valley AONB: Must commit the council to working with other local authorities and statutory agencies to implement its recommendations and comply with the WFD.	This joint working approach is already undertaken.
CPRE: Policy does not go far enough to address problems, especially with regard to agricultural water use. Also policy does not take into account of the Wye/Lugg designation as a SAC and the standard of protection this entails.	Agricultural water use lies outside of planning control, as stated in the supporting text of the policy. There is national guidance in place - for example PPS9 (para 6), which is already in place to protect designated areas such as SACs. All policies also have to go through the appropriate assessment process, to ensure any potential impacts are identified.
Environment Agency: Criterion 1: Refer to relevant Surface Water Management Plans. Include guidance on how to comply with the sequential test in the design code SPD. Add a para to the SFRA "Site Checklist of flood and drainage issues to help focus developers on key areas of importance with regard to flood risk and the sequential test. Incorporate reference to "safe" development within the policy . Criterion 2: Recommend removal of "wherever possible". Highlight need for no increase in run off. Criterion 3: New residential development should include water efficiency targets to a minimum of 105 litres per day from the adoption of the plan.	We have identified a need for surface water management plans. This will be looked at when developing design code SPD. We will consider making the suggested additions to the SFRA. The suggestion given to include reference to safe development, is too detailed for this level of policy. This would be looked at in more detail for site allocations and as part of the Design Code SPD. The text has been reworded to remove the term 'wherever possible.' The Policy has been reworded to highlight the need for no increase in runoff. Specific water efficiency targets will form part of the design policies, and of the lower tier area plans - to include a Design Code SPD.

<p>Environment Agency: Criterion 4 - It is vital that the evidence base is in place with regards to waste water infrastructure to inform deliverability with both the Core Strategy and Implementation Plan.</p> <p>Criterion 5: This point could address the issue of culverting. The opening up of watercourses is not a policy requirement of PPS25 and would be of benefit to be included.</p> <p>Maintenance and management of SUDs should also be a requirement.</p>	<p>We will continue to liase with water companies to establish as much information as possible, in order to inform deliverability of waste water infrastructure. The policy text has been amended to address culverting.</p> <p>The policy text has been amended to include the maintenance and management of SuDS.</p>
<p>Natural England: The policy would be strengthened by the inclusion of a water efficiency target or a reference to targets sitting elsewhere. The council should support applications to move to winter water harvesting/water storage, where these are in accordance with other policies. Food and drink manufacturing should be recognised as the other big water user in the county. Planning permissions which would require additional water abstractions should not be granted unless it is proven that: a) the river or groundwater resource has adequate headroom to allow for further abstractions, taking climate change projections into account; b) achieving ecological targets such as those set out in the WFD or in conservation status targets for SACs, would not be compromised. Recommend adding ' and volumes' after 'runoff rate' in criterion 5.</p>	<p>Water efficiency targets are to be included as part of the design policies, and the Design Code SPD.</p> <p>Water harvesting has been included within the policy.</p> <p>Agricultural use of water is specifically highlighted within the supporting text, as it is the largest consumer of water in the county, yet it is largely outside of planning control. Water abstractions would need to be dealt with through further consultation with the environment agency.</p> <p>There is already national guidance in place that sets out ecological targets that need to be met. Policy reworded to add the term 'volumes' as suggested.</p>
<p>Any new issues to be considered in HAP or MTRAP: No new issues identified.</p>	
<p>Any new options to be considered before Submission? Not at this time.</p>	
<p>Any new evidence required? We must continue to liase with water companies to establish as much information as possible, in order to inform deliverability of waste water infrastructure. Furthermore, as part of more detailed policies to be set out in the HAP and MTRAPs, surface water management plans may be required.</p>	

Question: Renewable energy	
Summary of Questionnaire responses (from associated report) Agree/agree with minor changes = 36 (72%) Disagree = 11 (22%) Undecided = 3 (6%) Total = 50	
Summary of free-write questionnaire comments received	How addressed in the Core Strategy
Make renewable energy installations easier to instigate through flexible planning policy.	The Core Strategy general policy on renewable energy gives support to the development of renewable energy technologies in the county. Further more detailed policies on this will be developed as part of the area plans, with the aim of encouraging renewable energy production in the county wherever possible.
Biomass energy should only be generated from waste and not from grown crops	The potential for a range of biomass fuel sources has been identified in the 2010 renewable energy study.
Make use of the rivers and streams for hydro-power.	The potential for hydropower has been investigated through the 2010 renewable energy study.
Communities and Parish Councils may need financial assistance and advice in developing local renewable energy sources.	Advice would be available as part of the planning application process. Further information will be held in the Design Code SPD. The provision of financial assistance is outside the remit of planning policy.
All types of renewable energy should be promoted and the conservation of energy through insulation.	The Renewable Energy evidence base study has assessed the potential for a range of renewable energy measures. These have been taken into account through the formulation of this policy. Further information on energy efficiency can be found in the policies on Design. They will also form part of the Design Code SPD.
We need pilot projects which can be visited by householders.	This is outside the remit of Core Strategy planning policy.
We do not look in favour on the production of crops for energy.	The need for a balance between food and energy crops has been identified.
Other ways of reducing carbon emissions will need to be found - given that the county is comprised of such a large rural area.	The need to reduce carbon emissions also falls under policies for movement (transport) and energy efficiency through design, and will be looked at more closely under these categories. The Design Code SPD will look at a range of design issues, with the aim of reducing carbon emissions in the county.

<p>Rather than concentrate on alternative sources of energy, we should first be aiming at using energy efficiently. New housing and public buildings should be built to passivhaus standards.</p>	<p>Energy efficiency will be looked at under policies for design, and as part of the Design Code SPD. New buildings will be expected to conform with the Code for Sustainable Homes and BREEAM standards.</p>
<p>Wind with its variable nature can never be a prime source of energy, nor is it financially effective. More emphasis on biomass.</p>	<p>The Renewable Energy evidence base study has assessed the potential for a range of renewable energy measures, and biomass was identified as a key resource in the county. This has been taken into account through the formulation of this policy.</p>
<p>Many of the assumptions of the renewable energy study are based on an incorrect figure relating to CO2 production. All potential savings of CO2 by renewables in this report must be reduced by 21% for the report to have any validity. There is also a small hydro scheme on the Teme at Leintwardine, that has been identified in the study. A local group has studied this possibility and dismissed it as being non-viable. This raises suspicion that some of the other projected sites may also be non-viable, particularly when assessed using the wrong 'savings' figure as explained above.</p>	<p>The value for CO2 emissions used in the study is from the latest available data (2010) from DEFRA/DECC. Figures used to represent emissions from turbines are also used by Government when appraising their policies. The methodology used for the study (developed by Government), provides a strategic view of the potential for renewable or low carbon energy technologies but does not provide for an in-depth study for a specific location or site. The study therefore, provides a guide as to where the opportunities for renewable and low carbon technologies exist. It does not, and is not intended to, state whether such technologies should be installed - as this can only be determined following a site specific feasibility study and engagement with the local community.</p>
<p>If new homes were fitted with solar panels it would be less damaging than windfarms which are less efficient. Homes should also be fitted with water butts and ground source heating.</p>	<p>The requirement for solar panels, domestic water harvesting and ground source heating, comes under the remit of design, and will be looked at more closely as part of the Design Code SPD.</p>
<p>Summary of responses from Stakeholders</p>	
<p>CAA: All wind turbine proposals should be notified to CAA's Directorate of Airspace. Tall structures might constitute an aviation hazard. LPAs are asked to inform CAA about developments that exceed 91.4m (300ft). The release and flaring of gases needs to be evaluated in terms of aviation hazard.</p>	<p>These issues will be looked at as part of the planning application process.</p>
<p>Transition Hay-on-Wye: Make stronger than 'encouraged.' Renewable energy schemes must be installed unless case can be made to the contrary.</p>	<p>The policy text has been amended to incorporate this.</p>

Herefordshire Friends of the Earth: The policy does not mention small-scale projects, they should not be excluded.	The policy relates to projects of all scales.
Malvern Hills/Wye Valley AONB: suggested amendment to criterion 2 to recognise the need to create a balance between food and energy crops. Priority should be given to biomass which makes use of the natural components of the landscape, i.e. woodland.	Policy text amended as suggested, to prioritise the use of natural components such as woodland, and to balance the need for food and energy crops.
Bloor Homes: The benefit of strategic sites in Hereford is the ability to adopt an approach to energy provision - to identify the most suitable and viable sustainable energy generation strategy which will assist in meeting national targets and the CSH.	This opportunity has been identified, and incorporated into the policy. It is acknowledged that retrofitting is an expensive and difficult process; therefore infrastructure to enable the use of renewable energy sources should be put in place during the process of development in the first instance.
English Heritage: To accord with PPS5, the policy should be expanded to refer to the historic environment and heritage assets.	Policy text amended as suggested, and now forms part of criterion 6.
CPRE: Suggest insertion of the text 'subject to community involvement and to assessment of landscape capacity and sensitivity.' Suggest to delete the term 'integrity of' and include 'have significant adverse landscape or visual impacts.' Delete 'where land of lower quality is available' - since the best and most versatile land is itself a major renewable resource, it would be absurd to destroy it.	Policy text amended as suggested.
Boughton Butler Consulting: Policy should support proposals which encourage the responsible use of heat.	This issue will be looked at in more detail as part of policies on design; and the Design Code SPD. Both of which will look at energy efficiency.
Any new issues to be considered in HAP or MTRAP: No new issues identified.	
Any new options to be considered before Submission? No new options at this time.	
Any new evidence required? No further evidence is required at this time. The 2010 Renewable Energy study provides an assessment of the potential for renewable energy production in the county.	

Question: Do you agree with the preferred policy for Infrastructure Contributions	
Summary of Questionnaire responses (from associated report)	
Agree: 36 (63%) Disagree: 21 (37%) Total 57	
Summary of free-write questionnaire comments received	How addressed in Core Strategy
Suggest specific text changes	Text changes to policy made where considered appropriate
Reduce growth	Levels of growth are as per the spatial strategy
Contributions should not fund a relief road but focus on sustainable transport	Sustainable transport measures are included in the types of infrastructure required through the Community Infrastructure Levy
Contributions should fund the relief road Infrastructure should come before development	Noted The timing of infrastructure provision will be set out in the Infrastructure Delivery Programme
More facilities in market towns will be detrimental to Hereford City vitality	The spatial strategy focuses on promoting self containment for the market towns to reduce the need to travel
Don't agree with non-negotiable tariff system	The tariff system is set out through central government regulations
Policy premature	Disagree - consultation on way forward is necessary at this stage of Core Strategy production
Exclude tourism development from tariff	Disagree. Large scale tourism proposals may have significant impacts on infrastructure requirements.
Unsound as viability assessment not complete	Accepted Viability Assessment not complete but modifications to policy will be made if significant changes required following receipt of study.
Need to agree on priorities and ensure no double counting	Agreed - already covered in policy explanation
Summary of responses from Stakeholders	
English Heritage - Reference to cultural facilities, heritage assets and built environment and public realm should be included	Noted - text changes made to policy
Malvern Hills and Wye Valley AONB - would like to be involved in SPD production	Noted - text changes made to policy
Sport England - Need to complete the sports assessment and strategy. Suggest text changes.	Noted - text changes made to policy
Hereford and Worcester Gardens Trust - Contradictions exist between the desire for new road infrastructure and new green infrastructure.	Agree - but balance has to be struck to achieve implementation of strategy

CPRE - CIL should not apply to relief road	Disagree - legitimate use of tariff monies.
Any new options to be considered before Submission? None	
Any new evidence required? None	