Herefordshire Local Plan
Main Modifications
Herefordshire Council Comments

Main Modification MM018 (HD5 and para 4.2.67)

Representations:
157 – Carter Jonas
192 – Highways England
325 - Barton Wilmore
271 – Geeson
283 – Morawiecka
334 – Wegg Prosser
338 – Bretherton Projects
714 – Hereford and South Herefordshire Green Party
321 – Historic England

Objectors:
9

Supporting comments:
None

Any specific points.
None

Summary of issues raised:

General summary.

- Support the proposed change to the policy to express the amount of residential development as a minimum figure. The Commissioners’ work on development capacity indicates the potential to accommodate between 1,000 and 1,300 dwellings (approximately) on land under their control, with the potential for additional development to come forward on land in third party ownership. (157 Carter Jonas)
- Use of the word ‘minimum’ in this modification results in inconsistencies with other modifications i.e. MM014 and MM017. Should have a consistent approach throughout the Core Strategy. (283 Morawiecka, 271 Geeson)
• Whilst the new Appendix 5 seeks to set out the infrastructure requirements for each strategic site, this is not a robust evidence base on which the vast majority of the county’s housing requirement should be relied upon. Therefore proposed modification MM018 is not effective or justified in terms of the test of soundness set out with in the NPPF. (325 Barton Willmore)
• Reference to the site being dependent on the delivery of the Hereford Relief Road has been removed. Appendix 5 is unclear about the relationship between housing delivery on the strategic sites and key infrastructure as one of the necessary infrastructure required for the site is excluded from Appendix 5 e.g. sustainable transport measure (including the park and choose site) which could help bring housing forward ahead of the completion of any road building schemes. (283 Morawiecka)
• Need to include additional line regarding heritage assets as is included in Policy HD6 (MM019) for consistency (334 Wegg-Prosser)
• This Policy needs to include the following for purposes of consistency: “Land at Three Elms will deliver a comprehensively planned sustainable urban expansion. The new development will be sensitively integrated into both the existing urban fabric of Hereford, and the wider landscape, through high design and sustainability standards.” (334 Wegg-Prosser)
• Delete repetition occurring in the first and last sentence. (334 Wegg-Prosser)
• Include wording from MM031 (Leominster) regarding water quality targets and the SAC. (334 Wegg-Prosser)
• Ongoing work with officers in the Highways department indicates a desire for two ‘Park & Choose’ sites located close to the Roman Road and Kings Acre Road, and so it would be better for the wording of the fifth bullet point to state: “Land and infrastructure for Park & Choose facilities.” (157 Cartas Jonas)
• Delete term ‘preserves’ as this is not consistent with NPPF terminology. Instead replace with ‘protect, conserve’ and where, …(321 Historic England)
• Notes the observations on the changes to the concept of park and ride sites. (192 Highways England)

Not related to modifications:
• The scale of the urban extensions does not appear to be supported by a strategic level evidence base. Would expect a suite of master planning documents and associated technical reports to be prepared alongside the plan. (325 Barton Willmore)

• This site is a Minerals Reserve Area which poses a risk to the delivery of the Core Strategy. Need to determine whether a Strategic site can be located on a Mineral Reserve Area when the Minerals and Waste plan is no longer part of the Core strategy and there is as yet no timetable to bring forward the Minerals and Waste Local Plan. (283 Morawiecka, 271 Geeson).
• Affordable housing should not be a target but an absolute requirement. (714 Hereford and South Herefordshire Green Party)
• Suggested amendment to bullet point 6 as follows “a new linear park along the Yazor Brook corridor connecting with the existing green infrastructure links east of the expansion area, the public rights of way network within and adjoining the expansion area
and informal recreation space; including arrangements for long term maintenance of the watercourse having regard to its importance to flood risk in the city centre” This is an opportunity to secure maintenance of the brook as part of the wider flood protection measures for the city centre (338 Bretherton Projects)

General overview and response.

• Dispute that Appendix 5 is unclear or requires further amendment. See responses made under MM07 for further detail.

• The words “a minimum of” were not included in the modifications to policy HD4 as they have been for other place shaping policies as in this case the capacity to accommodate over 500 dwellings at this strategic location is uncertain. This approach is evidenced by the current application for the site for up to 460 homes. Also see comments on MM014

• The reference to the protection of heritage assets and the requirements for an evaluation of the archaeological importance in HD6 reflects heritage assets in that area. It is not necessary to include similar statements in HD5 as Policy LD 4 will address these requirements.

• The proposed additional wording in MM031 in relation to the Leominster place shaping section was included at the request of Natural England. No such request was made in relation to Policy HD5.

• A modification was included under MM01 regarding the minerals reserves. This proposes a new paragraph stating that "The expansion area is subject to a safeguarding policy in respect of mineral reserves (sand and gravel). Applications for development will be assessed in this respect using the saved UDP policy M5 until this is replaced by the Minerals and Waste Local Plan policy". There are no further modifications proposed to this (see responses to MM01).

• It is correct that the Council is seeking the provision of two park and choose sites at this strategic urban extension. Therefore it is proposed to amend the wording accordingly.

Any suggested amended wording to clarify the existing published proposed modifications.

• To ensure a consistent approach with other policies, delete first sentence of HD5 and replace with:
  “Land at Three Elms will deliver a comprehensively planned sustainable urban expansion. The new development will be sensitively integrated into both the existing urban fabric of Hereford, and the wider landscape, through high design and sustainability standards. The development will be expected to provide: ..”
• Delete the second sentence from the policy as it is repeated in the final paragraph:
  “Appendix 5 sets out the relationship between the development of urban expansion areas and the provision of key new infrastructure.”

• Amend bullet point 11 to conform with NPPF as follows to accord with NPPF:
  • “integration of Huntington village into the development area in a way which respects, preserves, protects, conserves and, where possible, enhances the setting of the Conservation Area and heritage assets;”

• Update bullet point 5 to read:
  “Land and infrastructure for Park and Choose facilities”.

Any suggested further modifications.

• None

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