



Campaign to Protect  
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8<sup>th</sup> November 2010

LDF Reference No 343

#### LOCAL DEVELOPMENT FRAMEWORK - PREFERRED OPTIONS: GENERAL POLICIES 2ND TRANCHE - OCTOBER 2010

Thank you for consulting us about the above. The comments of Herefordshire CPRE are as follows:

##### **Economy**

We greatly welcome this policy, which, in its recognition of Herefordshire's traditional land-based economy as an asset rather than an embarrassment and in its encouragement of rural infrastructure such as broadband, is an enormous improvement on the UDP. This in turn entails the protection of the resource that underpins it, namely the land. Its importance is now multiplied by the identification of agricultural land in the Renewable Energy Study as by far the greatest renewable energy resource of the county and also the importance of well-stewarded land for tourism. Although the best and most versatile land is taken into account in PPS7, its particular importance to Herefordshire justifies mention in the Core Strategy. We propose the following:

Policy EC.1 (3). Add at the end "The permanent loss or degradation of the best and most versatile agricultural land will be avoided where practicable, and in the case of grade 1 land will be permitted only for the most exceptional reasons."

##### **Tourism, Culture and Leisure**

We greatly welcome the recognition through this policy of the importance of tourism based on the county's distinctive environmental assets. However, it is especially important that new development is of a kind and scale that derives from these assets and at the same time respects them, so we propose the following changes:

Policy EC.2 (1). After "new" insert "larger scale" and add at the end (or as a separate sub-paragraph):

".. and by recognising the high quality of the Herefordshire countryside as a key visitor attraction and the location for the smaller scale tourist development based on the enjoyment of the countryside."

Policy EC.2 (2) Add at the end ".. and having special regard for the visual amenity of such routes and trails and for the setting of heritage assets in their vicinity."

### **Sustainable Water Management**

The accompanying text rightly identifies the critical importance of water to Herefordshire 's environment and economy, but the Policy does not go far enough to address the problems, especially with regard to agricultural water use. Also, the text and Policy do not take account of designation of the Wye and Lugg river systems as a Special Area of Conservation and the standard of protection this entails. We suggest the following:

Policy WM.1: add the following two sub-paragraphs:

"Priority will be given to agriculture and forestry activities that make the most efficient and economical use of water, minimise impact on groundwater and minimise water pollution."

"Development will not be permitted unless it can be demonstrated that there will be no adverse effect on the integrity of the River Wye Special Area of Conservation."

Policy WM.1 (5) delete from "unacceptable" onward and substitute "significant adverse landscape or visual impact." [It is important to include visual impacts, which have a technically different meaning from landscape.]

### **Renewable Energy**

We broadly welcome this policy and in particular the recognition of the importance of biomass and thereby of the value of Herefordshire's resource of agricultural land. The Renewable Energy Study reveals that in Herefordshire the potential for renewable energy through biomass vastly outweighs any other renewable energy source including large-scale wind. This reflects the fact that the county has one of the greatest proportions of good agricultural land of any in England. Such land is a major resource, and for economic and tourism reasons, as well as energy production. In order to be internally consistent the Core Strategy should recognise this by policies elsewhere to protect the resource: see comments above on Economy policy. In addition we suggest the following with regard to this section:

Policy EN.1 (1). In Herefordshire's circumstances we see no practical benefit in identifying priority areas. The Renewable Energy Study confirms that the energy sources in question are highly dispersed throughout the county, so prioritisation by area is not helpful. Moreover, most of the factors determining the acceptability or otherwise of schemes are very localised and cannot be judged at an area level. However, if it is decided to retain this policy we strongly suggest the insertion at the end of the first sentence of "..subject to community involvement and to assessment of landscape capacity and sensitivity." [This is in line with the advice of PPS22 Companion Guide.]

Policy EN.1 (5)(a) Delete "the integrity of" [it adds nothing to the meaning and is potentially confusing.]

Policy EN.1 (5)(b) Substitute "have significant adverse landscape or visual impacts." [This is in line with PPS22 terminology.]

Policy EN.1 (5)(d) Delete "where land of lower value is available" [Since 'best and most versatile land' is itself a major renewable energy resource it would be absurd to destroy it in order to facilitate another energy resource.]

### **Infrastructure Contributions**

Consultees' ability to interpret this section is extremely limited in the absence of the Economic Viability Study to which it refers. With that proviso our main concern is the definition of strategic infrastructure, which extends to facilities that are necessitated by specific developments and can properly be funded via S106 obligations. Most of the facilities in question would benefit Hereford and unless the definition is altered the effect would be that the rest of the county would be paying for infrastructure that serves the City alone. CIL funding should be limited to strategic infrastructure that genuinely serves the whole county - such as the county hospital as opposed local health centres or tertiary education as opposed to primary schools. Above all it should apply only to transport infrastructure that improves movement through the county as a whole. This emphatically does not apply to the Hereford Relief Road, which, as the Relief Road Study shows, would absorb additional traffic generated by City housing expansion rather than improve the flow of through traffic. We suggest the following changes:

Policy ID.1 (a). Delete from "including" to "link road" and substitute "strategic transport improvements primarily facilitating the movement of people and goods through the county".

Policy ID.1 (a). Delete "renewable energy generation" [Energy generation, especially strategic plant, is normally privately funded and, in the case of schemes such as CHP integrated into new developments, should be funded by the developer either directly or through S106 obligations.]

Policy ID.1 (b). After "infrastructure" insert "serving the whole county".

Policy ID.1(c). Delete entirely [All the infrastructure listed serves specific localities and should be funded through S106 obligations.]

I should be grateful if you would take these comments into account in preparing the draft Core Strategy

Yours sincerely

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Chair

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The Campaign to Protect Rural  
England exists to promote the  
beauty, tranquillity and diversity of  
rural England by encouraging the  
sustainable use of land and other  
natural resources in town and  
country.