

Latham, James

From: Banks, Samantha
Sent: 11 June 2018 13:43
To: Latham, James
Subject: FW: Leominster queries

From:
Sent: 08 May 2018 16:07
To: Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>
Cc: Paul Russell <townclerk@leominstertowncouncil.gov.uk>
Subject: Leominster queries

Dear Sam

I did not receive any comments from Leominster Town Council on the comments submitted in response to the regulation 16 consultation by the deadline of 27th April.

I have the following queries with regard to the Leominster Area Neighbourhood Plan.

I have a general concern that for many of the policies there is either no explicit justification or only very brief justification with very little detailed evidence presented to support the policies. Many of my questions relate to this.

Policy LANP1.

Policy LANP1 refers to a new road linking the A44 at Barons' Cross and the A49 south-east of the town. This appears to be inconsistent Core Strategy Policy number LO2 which refers to "Leominster relief road linking the Worcester Road roundabout directly to the A44, to help relieve traffic congestion within the town and improve air quality in the Bargates area." Is there a reason for this?

Neither Policy LO2 or Policy LANP1 are explicit on the relationship between the Link Road and the SUE. Is the SUE dependent on the construction of all or part of the Link Road? Is there a risk that difficulties in defining a funding mechanism for the relief road will prevent completion of the SUE during the plan period?

Policy LANP 1 includes the statement that "The eastern section of the SUE will be the first phase with active travel links to the town centre." Is there any evidence or justification for this statement.

Policy LANP2

Criterion n refers to the "nutrient management plan" There is no explanation of what this is or what it relates to, but from the SEA and elsewhere in the Plan I believe it relates to the River Wye SAC and that the valley of the River Lugg is included in this?

Criterion o refers to Cockcroft Hill and land to the west and there is a reference in in CS Policy LO2 to "the highly sensitive landscape areas and geological features of Cockcroft Hill (which encompasses Ryelands Croft)". These areas are not defined, other than the symbol for a local geological site on the Leominster Town Policies Map and the much more extensive area on the map of proposed Local Green Spaces relating to Policy LANP11. Is there an agreed view on the extent of the areas referred to in Policy LO2?

Policy LANP3

There is some conflict between the supporting text of the HC and the views expressed by HC in its Progression to Examination document for the LANP. Paragraph 4.6.8 of the CS states that "The land south of Leominster is sufficient not only to meet the housing target for the current plan period but is also likely to help meet the housing needs of the town through further development post 2031 supported by new highway infrastructure and community facilities". However the Progression to Examination document asks "is there evidence to show that this residual requirement can be met through the policies of this plan

and within the settlement boundary.” Is there an explanation for this apparent conflict? Also, The comments of HCC also suggest that existing commitments total 644 dwellings rather than 587 dwellings. Is the figure of 644 agreed? If so can it be evidenced?

Also, Policy LANP 3 refers to “small scale developments”. Small scale is not defined but Policy LO1 of the HCS refers to strategic sites, which are defined in the glossary as sites of around 100 dwellings or more, and smaller sites. Is it reasonable to infer from this that small scale means up to around 100 dwellings?

I have a few days break from now until 14th May. No doubt there will be further queries on my return.

Kind Regards

Richard

Latham, James

From: Banks, Samantha
Sent: 11 June 2018 13:44
To: Latham, James
Subject: FW: Leominster NDP queries
Attachments: LEOMINSTER COMMITMENTS (ANGELA).xlsx

From: Banks, Samantha
Sent: 10 May 2018 14:25
To:
Cc: Paul Russell <townclerk@leominstertowncouncil.gov.uk>
Subject: RE: Leominster NDP queries

Dear Richard,

Please find attached the Herefordshire Council responses to the queries which you have posed, I have consulted colleagues within the Strategic Planning Team for advice with regards to the CS policy interpretation and housing figures.

I note that you have already received comments from Leominster Town Council directly.

Policy LANP1.

Query: Policy LANP1 refers to a new road linking the A44 at Barons' Cross and the A49 south-east of the town. This appears to be inconsistent Core Strategy Policy number LO2 which refers to "Leominster relief road linking the Worcester Road roundabout directly to the A44, to help relieve traffic congestion within the town and improve air quality in the Bargates area." Is there a reason for this?

Response: This is referring to the same element of infrastructure. Worcester Road roundabout is the junction of A49 and A44. The descriptions are slightly different but there is a significant inconsistency. The map on page 12 gives clarity that the eastern terminus of the new road is, regardless of the choice of words, the same place; as to reason the NDP has not used the same script as the Core Strategy.

Query: Neither Policy LO2 or Policy LANP1 are explicit on the relationship between the Link Road and the SUE. Is the SUE dependent on the construction of all or part of the Link Road? Is there a risk that difficulties in defining a funding mechanism for the relief road will prevent completion of the SUE during the plan period?

Response: The Core Strategy anticipates the road being brought forward concurrent with the housing development (see Core Strategy appendix 5 serial 16 – page 57 of Core Strategy Appendices) with recognition of continuation to explore funding mechanisms with LEP, HCA and Herefordshire Council. In my view the site is only likely to be viable if an element of housing is delivered as the road is progressed (rather than after the completion of the road). The delivery of the SUE requires the totality of the proposed road, and vice versa. However both elements (SUE and road) can be phased and these phases need not necessarily at any point always be codependent (one may be more or less advanced than the other), providing that sufficient access is afforded to the new housing development as it emerges. The economics of the road as a piece of enabling infrastructure for the SUE were fully examined during the examination of the Core Strategy, and they were found sound, therefore there is no foreseeable risk that the SUE can't be delivered within the plan period.

Since the adoption of the Core Strategy the landowner developer have proved reluctant to enter discussions regarding the funding of the road through developer contributions. However, the Council are continuing to have positive discussions with the HCA

Query: Policy LANP 1 includes the statement that “The eastern section of the SUE will be the first phase with active travel links to the town centre.” Is there any evidence or justification for this statement.

Response: The western edge of the SUE will add traffic onto the Bargates area which is the area which suffers most from congestion and problems with air quality. So from this point of view there is a justification. However, not aware of any detailed evidence that indicates that prevents any development from being delivered prior at the western edge of the site and the HCS does not suggest this.

Policy LANP2

Query: LANP2 Criterion n refers to the “nutrient management plan” There is no explanation of what this is or what it relates to, but from the SEA and elsewhere in the Plan I believe it relates to the River Wye SAC and that the valley of the River Lugg is included in this?

Response: The Nutrient Management Plan was prepared by the Environment Agency (EA) and Natural England (NE). The Plan identifies actions that achieve the phosphorous conservation target of the River Wye SAC.

A key element of the supporting information for growth targets in the Herefordshire Core Strategy was the Nutrient Management Plan (NMP). The NMP had been developed in a way which took into account proposed development growth within Herefordshire and Powys and it demonstrated that the levels of development proposed in the Core Strategy are deliverable over the Plan period whilst achieving and maintaining Favourable Condition Status for the River Wye SAC. The inclusion within the Core Strategy of policies such as SS3 and SD4 complement the NMP measures.

The River Lugg forms part of the River Wye SAC from a point close to Bodenham some 3-4 miles south of Leominster to its confluence with the River Wye at Hereford. More details regarding the NMP can be viewed on Herefordshire Council website at:

https://www.herefordshire.gov.uk/downloads/download/102/nutrient_management_plan

Query: LANP2 Criterion o refers to Cockcroft Hill and land to the west and there is a reference in in CS Policy LO2 to “the highly sensitive landscape areas and geological features of Cockcroft Hill (which encompasses Ryelands Croft)”. These areas are not defined, other than the symbol for a local geological site on the Leominster Town Policies Map and the much more extensive area on the map of proposed Local Green Spaces relating to Policy LANP11. Is there an agreed view on the extent of the areas referred to in Policy LO2?

Response: Cockcroft Hill has been long recognized as an important feature of the town particularly as viewed from the south. However, there is not an agreed view on the extent of Cockcroft Hill and am not aware of a detailed justification of the extensive area shown in LANP11 . In the absence of a policy such as LANP11 the area would have been identified through an agreed masterplan probably prepared by the developer (in conjunction with Herefordshire Council). I’m not certain that the landowner/developer were engaged in identifying the extent of this area.

Policy LANP3

Query: There is some conflict between the supporting text of the HC and the views expressed by HC in its Progression to Examination document for the LANP. Paragraph 4.6.8 of the CS states that “The land south of Leominster is sufficient not only to meet the housing target for the current plan period but is also likely to help meet the housing needs of the town through further development post 2031 supported by new highway infrastructure and community facilities”. However the Progression to Examination document asks “is there evidence to show that this residual requirement can be met through the policies of this plan and within the settlement boundary.” Is there an explanation for this apparent conflict?

Response: The Core Strategy anticipated that 1500 dwellings could be completed on the SUE by 2031 but that its overall capacity was greater than 1500 and its development could continue into subsequent plan periods. This recognized the local housing market would be unlikely to deliver more on this site within the lifetime of the plan. My understanding is that the Progression to Examination document provides evidence of how the HCS target of 2300 can be delivered on the basis of the SUE providing 1500 and taking into account outstanding commitments and potential opportunities within the settlement boundary. I’m not sure that there is necessarily a conflict as long as the NDP

provides robust evidence to demonstrate the target can be achieved. The Town Council have produced a housing background report which contains their evidence of meeting the requirement.

Query: Also, The comments of HCC also suggest that existing commitments total 644 dwellings rather than 587 dwellings. Is the figure of 644 agreed? If so can it be evidenced?

Response: See attached spreadsheet. These are the housing land figures from April 2017 which indicate commitments of 645. April 2018 figures have yet to be compiled.

Query: Also, Policy LANP 3 refers to “small scale developments”. Small scale is not defined but Policy LO1 of the HCS refers to strategic sites, which are defined in the glossary as sites of around 100 dwellings or more, and smaller sites. Is it reasonable to infer from this that small scale means up to around 100 dwellings?

Response: The Core Strategy indicates that sites of over 100 dwellings within market towns are considered strategic. The inference being that any allocations between 1 and 99 should be included within the NDP. The definition of ‘small scale’ in terms of Policy LANP3 is a matter for the NDP group to define within their policy justification.

Hope you found these responses useful and if you have any further queries, please let me know.

Kind regards

Sam

Herefordshire.gov.uk

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Hereford
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email: sbanks@herefordshire.gov.uk
www.herefordshire.gov.uk/neighbourhoodplanning

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LEOMINSTER AREA NEIGHBOURHOOD PLAN OCTOBER 2017 - UPDATE FROM STRATEGIC PLANNING

APPLICATION NUMBER	SITE ADDRESS	PROPOSAL	TOTAL UNITS	APPLICATION STATUS
152465	LAND AT LONGLANDS, MONKLAND ROAD, LEOMINSTER	PROPOSED ERECTION OF 2 DWELLINGS		2 UNDER CONSTRUCTION
141791	LAND BETWEEN 21 HOPTARD CLOSE AND 22 PORTNA WAY, LEOMINSTER	PROPOSED ERECTION OF 6 DWELLINGS		6 6 COMPLETED 15/16
150812	LAND OFF WESTCROFT, LEOMINSTER	RESIDENTIAL DEVELOPMENT FOR 30 DWELLINGS		30 RESERVED MATTERS 171309 - APPROVED 22/11/2017
160812	LAND AT WEST WINDS, CHOLESTREY ROAD, LEOMINSTER	PROPOSED 23 DWELLINGS WITH GARAGES		23 NOT STARTED
172135	BARONS CROSS CAMP	RESERVED MATTERS FOR 414 DWELLINGS		414 APPLICATION NOT DETERMINED - PREVIOUS APPLICATION - 120887 EXTENSION OF TIME - DECISION DATE 08/6/2 425 UNITS
161937	THE BIRDCAGE, BARONS CROSS ROAD, LEOMINSTER	ERECTION OF A PAIR OF SEMI-DETACHED HOUSES		2 NOT STARTED
162359	LAND TO THE REAR OF HOWARD COTTAGE	ERECTION OF 2 HOUSES		2 NOT STARTED
140665	LAND AT LAUNDRY LANE, LEOMINSTER	DEVELOPMENT OF 41 NEW BUILD RESIDENTIAL HOUSES		41 UNDER CONSTRUCTION
161486	LAND AT PINFARTHINGS, NORTH MAPPENORS LANE, LEOMINSTER	RESIDENTIAL DEVELOPMENT OF UP TO 21 DWELLINGS		21 NOT STARTED
141022	LAND AT PINSLEY ROAD, LEOMINSTER	ERECTION OF 29 DWELLINGS		29 UNDER CONSTRUCTION
161189	LAND ADJOINING HENGRIVE GREEN, IVINGTON, LEOMINSTER	ERECTION OF 7 DWELLINGS		7 NOT STARTED
161133	LAND AT CHURCH VIEW, IVINGTON	2 X 3 BED SEMI DETACHED PROPERTIES		2 NOT STARTED
160811	BRIERLY COURT HOP FARM	EIGHT DETACHED DWELLING HOUSES		8 NOT STARTED
		TOTAL		587

Application Status	Application Number	Site Address	Parish	Not Started	Under Construction				
Active	DCNC2007/2869/F	44 Vicarage Street, Leominster	Leominster	0	4				
Active	141022	Land at Pinsley Road Leominster	Leominster	0	29				
Active	150812	Land off Westcroft, Leominster, Herefordshire, HR6 8HG	Leominster	30	0				
Active	160761	Barn adjacent Comfordt House, Eaton Hill, Leominster, Herefordshire	Leominster	0	2				
Active	161592	Agricultural building at Ridgeway Farm, Ludlow Road, Leominster, Herefordshire	Leominster	0	1				
Active	161456	26 High Street, Morris Mews, Leominster	Leominster	3	0				
Active	141006	Land off Ebnal Close, Leominster, Herefordshire	Leominster	4	0				
Active	NC100122/RM	Barons Cross Camp, Cholstrey Road, Leominster, HR6 8RT	Leominster	425	0				
Active	161133	Land at Church View, Ivington, Leominster, Herefordshire	Leominster	2	0				
Active	161189	Land adjoining Hengrave Green, Ivington, Leominster, Herefordshire, HR6 0JL	Leominster	7	0				
Active	161486	Land at Pinfarthings, Off North Mappenors Lane, Leominster, Herefordshire	Leominster	21	0				
Active	161692	51 West Street, Leominster, Herefordshire, HR6 8EP	Leominster	3	0				
Active	161753	Badgers Court, 27-31 South Street, Leominster, Herefordshire, HR6 8JQ	Leominster	0	2				
Active	161937	Site at The Birdcage, Barons Cross Road, Leominster, Herefordshire	Leominster	2	0				
Active	162359	Land to the rear of Howard Cottage, Barons Cross Road, Leominster, Hereford	Leominster	2	0				
Active	162547	Land at Copper Beech Close, Leominster, Herefordshire, HR6 8LE	Leominster	1	0				
Active	163562	Land between Wharton Cottage and Bannut Tree Cottage, Wharton, Leominster, Herefordshire	Leominster	6	0				
Active	150052	Land off Ginhall Lane, Leominster	Leominster	12	0				
Active	160226	Land adjacent 87 Bridge Street, Leominster, Herefordshire, HR6 8EA	Leominster	1	0				
Active	160553	Land at Brick House Farm, Brierley, Leominster, Herefordshire, HR6 0NT	Leominster	4	0				
Active	160811	Brierley Court Hop Farm, Brierley Lane, Brierley, Leominster, HR6 0NU	Leominster	8	0				
Active	160812	Land at West Winds, Cholstrey Road, Leominster, Herefordshire, HR6 8RT	Leominster	23	0				
Active	152465	Land at Longlands, Monkland Road, Barons Cross, Leominster, Herefordshire	Leominster	0	2				
Active	140665	Land at Laundry Lane, Leominster, Herefordshire	Leominster	0	41				
Active	N111284/F	Former Orphans Printing Press, Laundry Lane, Leominster, Herefordshire, HR6 8JT	Leominster	0	10				
			total	554	91				

Latham, James

From: Banks, Samantha
Sent: 11 June 2018 13:44
To: Latham, James
Subject: FW: Leominster NDP queries

From:
Sent: 15 May 2018 16:11
To: Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>
Cc: 'Paul Russell' <townclerk@leominstertowncouncil.gov.uk>
Subject: RE: Leominster NDP queries

Dear Sam

Thank you for the response below. I have some further queries:

I assume that the "Housing background report" you refer to is the "Leominster Area Neighbourhood Plan Evidence Statement" which is referred to on the Leominster Town Council website. I should be grateful if you could clarify the status of this as it is not dated, though Appendix 1 to it refers to notes dated February 2018. This is clearly important evidence, but it does not seem to have been part of the documentation which was subject to the regulation16 consultation and it is not referred to in any of that documentation.

In the interests of accuracy I am trying to reconcile a number of inconsistencies within the information on housing commitments in the Evidence Base and between the Evidence Base and the table in the Plan. While these are small, they do have implications for the dwelling requirement, it will be helpful to have consistent numbers within the Plan and its supporting documents.

1. Page 13 refers twice to a need identified by the Core Strategy for a minimum of 2,500 new homes for Leominster. This appears to be an error as the HCS says 2,300.
2. The table in the Evidence Statement is clearly fuller than that on pages 30/31 and I have therefore regarded that as the more up to date statement of commitment.
3. Figures of 425, 424 and 414 have been used for Barons Cross. From paragraph 3.2 of the evidence base it would appear that 414 is the correct figure.
4. The introduction to the table of completions on Page 3 of the Evidence Base says 128 completions but the Table in paragraph 3.3 says 129, which appears to be the up to date figure.
5. The table in Paragraph 3.4 uses the figure of 644 permissions notwithstanding the adjustment at Baron's Court, which according to Paragraph 3.2 would make the actual commitments total 634. If this is the case the additional dwelling requirement would be 37 rather than 27 dwellings.
6. The Total figure in the table in paragraph 3.5 states that 24 dwellings have been approved. Paragraph 3.6 says that 19 dwellings have been approved and by adding up those which say "yes" it appears that the correct figure is 23.
7. Paragraph 3.6 also adds the dwellings awaiting approval to those permitted in order to reach the conclusion that sufficient houses have been provided for. This assumes that all of these applications will be approved, which may not be the case. Also this calculation seems to be based on an additional requirement of 38 (almost the same as my calculation in 4 above) rather than the 27 identified in paragraph 3.2.

I should be grateful if you and the Parish Council could check these figures and let me have a joint response as to whether my interpretation is correct.

The wording of Policy LANP 3 and the supporting text is confusing in several respects. Is it intended that the criteria in the policy should apply to the SUE – if not why not? Should the reference to the "previously developed site at Baron's Cross" refer to the "permitted site for 414 dwellings at Baron's Cross? It is not clear why any development

granted in the exceptional circumstances referred to at the top of page 30 should only be required to comply with criterion b).

In relation to criterion e. Are there any published parking standards for Herefordshire?

Kind Regards

Richard

Latham, James

From: Banks, Samantha
Sent: 11 June 2018 13:45
To: Latham, James
Subject: FW: Leominster NDP queries

From:
Sent: 16 May 2018 10:35
To: Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>; Paul Russell <townclerk@leominstertowncouncil.gov.uk>
Subject: FW: Leominster NDP queries

Dear Sam

Further to the e mail below, Does the Core Strategy policy require 2300 dwellings in Leominster itself plus proportionate growth in the three settlements of Ivington, Brierley and Wharton, or is the requirement for 2300 in the parish to which proportionate growth in the three other settlements would make a contribution. The supporting text to Policy RA2 indicates that where there are several rural settlements in one parish there is flexibility as to how the growth is distributed between them, but it does not provide guidance on the approach where there are rural settlements within a parish containing a market town. While the numerical implications are small they do affect the tables referred to below and thus the scale of any residual need.

Kind Regards

Richard

From:
Sent: 15 May 2018 16:11
To: 'Banks, Samantha' <Samantha.Banks2@herefordshire.gov.uk>
Cc: 'Paul Russell' <townclerk@leominstertowncouncil.gov.uk>
Subject: RE: Leominster NDP queries

Dear Sam

Thank you for the response below. I have some further queries:

I assume that the "Housing background report" you refer to is the "Leominster Area Neighbourhood Plan Evidence Statement" which is referred to on the Leominster Town Council website. I should be grateful if you could clarify the status of this as it is not dated, though Appendix 1 to it refers to notes dated February 2018. This is clearly important evidence, but it does not seem to have been part of the documentation which was subject to the regulation16 consultation and it is not referred to in any of that documentation.

In the interests of accuracy I am trying to reconcile a number of inconsistencies within the information on housing commitments in the Evidence Base and between the Evidence Base and the table in the Plan. While these are small, they do have implications for the dwelling requirement, it will be helpful to have consistent numbers within the Plan and its supporting documents.

1. Page 13 refers twice to a need identified by the Core Strategy for a minimum of 2,500 new homes for Leominster. This appears to be an error as the HCS says 2,300.
2. The table in the Evidence Statement is clearly fuller than that on pages 30/31 and I have therefore regarded that as the more up to date statement of commitment.

3. Figures of 425, 424 and 414 have been used for Barons Cross. From paragraph 3.2 of the evidence base it would appear that 414 is the correct figure.
4. The introduction to the table of completions on Page 3 of the Evidence Base says 128 completions but the Table in paragraph 3.3 says 129, which appears to be the up to date figure.
5. The table in Paragraph 3.4 uses the figure of 644 permissions notwithstanding the adjustment at Baron's Court, which according to Paragraph 3.2 would make the actual commitments total 634. If this is the case the additional dwelling requirement would be 37 rather than 27 dwellings.
6. The Total figure in the table in paragraph 3.5 states that 24 dwellings have been approved. Paragraph 3.6 says that 19 dwellings have been approved and by adding up those which say "yes" it appears that the correct figure is 23.
7. Paragraph 3.6 also adds the dwellings awaiting approval to those permitted in order to reach the conclusion that sufficient houses have been provided for. This assumes that all of these applications will be approved, which may not be the case. Also this calculation seems to be based on an additional requirement of 38 (almost the same as my calculation in 4 above) rather than the 27 identified in paragraph 3.2.

I should be grateful if you and the Parish Council could check these figures and let me have a joint response as to whether my interpretation is correct.

The wording of Policy LANP 3 and the supporting text is confusing in several respects. Is it intended that the criteria in the policy should apply to the SUE – if not why not? Should the reference to the "previously developed site at Baron's Cross" refer to the "permitted site for 414 dwellings at Baron's Cross? It is not clear why any development granted in the exceptional circumstances referred to at the top of page 30 should only be required to comply with criterion b).

In relation to criterion e. Are there any published parking standards for Herefordshire?

Kind Regards

Richard

Latham, James

From: Banks, Samantha
Sent: 11 June 2018 13:46
To: Latham, James
Subject: FW: Leominster NDP queries
Attachments: LEOMINSTER COMPLETIONS (2011-17).xlsx

Importance: High

From: Banks, Samantha
Sent: 30 May 2018 11:52
To:
Subject: FW: Leominster NDP queries
Importance: High

Good Morning Richard,

I note that Leominster have sent you responses to the queries, but did not include the Herefordshire Council responses which we sent to them prior to sending across to you.

Please find them attached below

Kind regards

Sam

From: Banks, Samantha
Sent: 18 May 2018 13:27
To: 'Paul Russell' <townclerk@leominstertowncouncil.gov.uk>
Subject: RE: Leominster NDP queries
Importance: High

Dear Paul,

Please find attached the comments from our Strategic Planning Team who undertake the housing monitoring and you confirm that you are happy for this to be sent as the formal response.

1. Page 13 refers twice to a need identified by the Core Strategy for a minimum of 2,500 new homes for Leominster. This appears to be an error as the HCS says 2,300.
The Core Strategy indicates a 2,300 minimum, this is within Policy LO1
2. The table in the Evidence Statement is clearly fuller than that on pages 30/31 and I have therefore regarded that as the more up to date statement of commitment.
This is correct
3. Figures of 425, 424 and 414 have been used for Barons Cross. From paragraph 3.2 of the evidence base it would appear that 414 is the correct figure. **The outline permission for this site suggested 425 dwellings and this was used as the basis in the housing supply information provided by Herefordshire Council for April 2017 as set out in the spreadsheet with 2017 commitments. However the subsequent reserved matters**

permission (172135) granted on 6th Feb 2018 is for **414** dwellings. Herefordshire Council figures will adjust the commitment figure accordingly in producing the housing supply for April 2018.

4. The introduction to the table of completions on Page 3 of the Evidence Base says 128 completions but the Table in paragraph 3.3 says 129, which appears to be the up to date figure.
The spreadsheet attached sets out completions data for the period 2011-17 suggesting 128 net completions up to April 2017. The table in 3.3 of the evidence base would appear to have a slight error in 2016-16 which should be 15 rather than 16 net completions.
5. The table in Paragraph 3.4 uses the figure of 644 permissions notwithstanding the adjustment at Baron's Court, which according to Paragraph 3.2 would make the actual commitments total 634. If this is the case the additional dwelling requirement would be 37 rather than 27 dwellings.
As with completions the Herefordshire Council permissions figure (644) is based upon a date of April 2017 (so includes 425 at Baron's Cross). There is some danger of taking account of mid-year figures. The annual assessment takes account of completions over the year, the lapse of permissions and avoids double counting where new applications are approved on sites with existing permissions.
6. The Total figure in the table in paragraph 3.5 states that 24 dwellings have been approved. Paragraph 3.6 says that 19 dwellings have been approved and by adding up those which say "yes" it appears that the correct figure is 23.
My calculation suggests the table does add up to 24 dwellings, however the table does not indicate the dates of the permissions/applications whether the figures are net etc (see response to q5 above).
7. Paragraph 3.6 also adds the dwellings awaiting approval to those permitted in order to reach the conclusion that sufficient houses have been provided for. This assumes that all of these applications will be approved, which may not be the case. Also this calculation seems to be based on an additional requirement of 38 (almost the same as my calculation in 4 above) rather than the 27 identified in paragraph 3.2.
Herefordshire Council would not recommend including the numbers related to planning applications where no decision has been made.

I assume that the "Housing background report" you refer to is the "Leominster Area Neighbourhood Plan Evidence Statement" which is referred to on the Leominster Town Council website. I should be grateful if you could clarify the status of this as it is not dated, though Appendix 1 to it refers to notes dated February 2018. This is clearly important evidence, but it does not seem to have been part of the documentation which was subject to the regulation16 consultation and it is not referred to in any of that documentation.

Leominster Town Council to provide a response

The wording of Policy LANP 3 and the supporting text is confusing in several respects. Is it intended that the criteria in the policy should apply to the SUE – if not why not? Should the reference to the "previously developed site at Baron's Cross" refer to the "permitted site for 414 dwellings at Baron's Cross? It is not clear why any development granted in the exceptional circumstances referred to at the top of page 30 should only be required to comply with criterion b).

Leominster Town Council to provide a response

In relation to criterion e. Are there any published parking standards for Herefordshire?

The latest adopted car parking standards are Highways Design Guide for new development (July 2006) https://www.herefordshire.gov.uk/downloads/download/585/highways_and_new_development

Please could you return any comments as soon as possible to ensure the continuing progress of the examination.

Kind regards

Sam

Samantha Banks
Neighbourhood Planning Team Leader
Neighbourhood Planning Team
Herefordshire Council
Plough Lane
Hereford
HR4 0LE

Tel: 01432 261576

email: sbanks@herefordshire.gov.uk
www.herefordshire.gov.uk/neighbourhoodplanning

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Latham, James

From: Banks, Samantha
Sent: 11 June 2018 13:49
To: Latham, James
Subject: FW: Leominster NDP queries

From: Banks, Samantha
Sent: 16 May 2018 14:51
To: Paul Russell
<townclerk@leominstertowncouncil.gov.uk>
Subject: RE: Leominster NDP queries

Dear Richard,

The Core Strategy indicates 2,300 new homes within Leominster during the plan period.

Proportional growth in accordance with Policy RA2 was worked out on a parish basis, these three settlements fall within the parish of Leominster. With this in mind, and given the extent of the growth already indicated within Policy LO1, these three settlements were not given as specific proportional growth requirement. Leominster Town Council were given the flexibility to determine whether any of the 2300 was directed towards all or any of these settlement. This was in line with the approach indicated to other parishes with multiple settlements within para 4.8.21 of the Core Strategy.

Kind regards

Sam

Herefordshire.gov.uk

Samantha Banks
Neighbourhood Planning Team Leader
Neighbourhood Planning Team
Herefordshire Council
Plough Lane
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Tel: 01432 261576

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Any opinion expressed in this e-mail or any attached files are those of the individual and not necessarily those of Herefordshire Council.

Completions 2011/12

Application Number	Site Address	Parish	Completed 11/12	Notes	Lost Through Conversion	Lost Through Demolition
DCNC0009/1210/F	Neuralia Worcester Road Leominster, Herefordshire HR6 8AS	Leominster	1	Conversion and extension of detached garage to form 2 bedroom bungalow.	0	0
DCNC2009/0543/F	5 Broad Street Leominster Herefordshire HR6 8BS	Leominster	4	Proposed conversion of offices into 4 no. flats.	0	0
DCNC103644	Land at New Street, Leominster, Herefordshire	Leominster	24	24 Flats built above ground floor commercial premises - note currently u/c no proper planning ref 2011 ref based on	0	0
DCNC2008/1950/F	Land to the rear of Bargates and off Wesfield Walk, Leominster, Herefordshire.	Leominster	10	Proposed demolition of garage blocks and erection of 10 houses, parking and improvements to access.	0	0
NC91583/F	Site Of Former Primrose Travel, Etnam Street, Leominster, Herefordshir	Leominster	7	Proposed erection of seven two-bedroomed houses.	0	0
N103144/F	11a West Street, Leominster, Herefordshire	Leominster	2	Proposed conversion of dwelling into two self contained flats.	1	0
N112703/F	Pinsley Guest House, 29 Broad Street, Leominster, Herefordshire, HR6 8DD	Leominster	1	Proposed change of use from guest house to a mixed use of private;dwelling and bed and breakfast facilities. (Part	0	0
NC101226/F	Minerva Place, 6 Hereford Terrace, Leominster, Herefordshire, HR6 8JR	Leominster	1	Proposed residential development for 3 new detached dwellings and;conversion of The Coach House to a cottage.	0	0
NC100823/F	Meadway, Portna Warden Lane, Barons Cross Road, Leominster Herefords	Leominster	1	Proposed replacement dwelling.	0	1
N120402/F	7 Broad Street, Leominster, Herefordshire, HR6 8BT	Leominster	1	Proposed conversion and extension of outbuildings to self contained;residential unit.	0	0
TOTAL			52			

52 - 2 losses on completed sites = 50 completions (net)

Completions 2012/13

Application Number	Site Address	Parish	Completed 12/13	Notes	Lost Through Conversion	Lost Through Demolition	Lost Through Change of Use
DCNC0009/0931/F	Marsh Mill, Bridge Street, Leominster, Hereford HR6 8DZ	Leominster	4	Erection of 7 No. 2-bedroom dwellings & car parking. (revised scheme)	0	0	
N101946/F	Archer House, Ryelands Road, Leominster, Herefordshire, HR6 8PN	Leominster	1	Proposed dwelling and detached double garage.	0	0	
N102072/F	Copper Beeches, 126a South Street, Leominster, Herefordshire, HR6 8JN	Leominster	7	Demolish existing building and replace with proposed residential development of 7 houses.	0	1	
N113544/F	Land behind Buckfield Keep, Baron Cross Road, Leominster, Herefordshire, HR6 8QX	Leominster	1	Proposed dwelling with attached garage.	0	0	
N111461/F	Land at, 19/21 Burgess Street, Leominster, Herefordshire, HR6 8DE	Leominster	2	Change of use and conversion of upper floors to create two self;contained maisonettes.	0	0	
N102899/F	42 Broad Street, Leominster, Herefordshire, HR6 8BS	Leominster	1	Change of use from offices back to residential.	0	0	
TOTAL			16				

16 - 1 loss on completed sites = 15 completions (net)

Completions 2013/14

Application Number	Site Address	Parish	Completed 13/14	Notes	Lost Through Conversion	Lost Through Demolition	Lost Through Change of Use
N102919/F	2/3 Foundry Place, West Street, Leominster, Herefordshire, HR6 0DE	Leominster	2	Change of use of ground floor offices into 2 self contained studio;flats.	0	0	
N121878/F	Outbuildings at Eaton Hill, Ludlow Road, Leominster, Herefordshire, HR6 0DG	Leominster	2	Conversion of outbuildings into two dwellings	0	0	
NC100512/F	The Hyde, Hyde Ash, Leominster, Herefordshire, HR6 0JS	Leominster	1	Proposed alterations & extensions to house and conversion of outbuilding to include ancillary accommodation and a one bedroom;'granny flat annexe'.	0	0	

16 completions - 2
 losses = 14
 completions (net)

Completions 2015/16

Application Number	Site Address	Parish	Total completed 2015/16	Notes	Lost Through Conversion	Lost Through Demolition	Lost Through Change of Use
141534	Land at 78 Castlefields, Leominster, Herefordshire, HR6 8BJ	Leominster	1	Proposed two bedroom bungalow.	0	0	0
091268	Land to the rear of the Nook, Etnam Street , Leominster	Leominster	6	Construction of 6 terrace cottages	0	0	0
141814	Tickbridge Farm, Tickbridge Lane, Hamnish, Leominster, Herefordshire, HR6 0QL	Leominster	1	Reserved Matters for agricultural workers dwelling.	0	0	0
141791	Land between 21 Hopyard Close and 22 Portna Way, Leominster, Herefordshire	Leominster	6	Proposed erection of 6 nos. dwellings and associated hard and soft;landscaping (including parking)	0	0	0
150647	Land at 87 Bridge Street, Leominster, Herefordshire, HR6 8EA	Leominster	2	Proposed extension and division of single dwelling into two separate;dwellings.	1	0	0
151173	19 School Lane, Leominster, Herefordshire, HR6 8AA	Leominster	1	Proposed change of use of first floor office space to residential;accommodation.	0	0	0
Total			17				

17 completions - 2
 losses = 15
 completions (net)

Completions 2016/17

Application Number	Site Address	Parish	Total completed 2016/17	Notes	Lost Through Conversion	Lost Through Demolition	Lost Through Change of Use
160914	17 - 19 High Street, Leominster, Herefordshire, HR6 8LZ	Leominster	1	Proposed conversion of upper floors into self-contained 2 bedroom;maisonette and sub-division of ground floor shop.	0	0	0
153326	2a Rainbow Street, Leominster, Herefordshire, HR6 8DQ	Leominster	2	Proposed conversion of first floor flat into 2 self-contained one;bedroom flats.	1	0	0
152990	Land to rear of Howard Cottage, Barons Cross Road, Leominster, Herefordshire	Leominster	5	Variation of Condition 2 of Planning Permission N123271/F (Construction of 5 detached dwellings).	0	0	0
150791	The Hen House, Ivington Road, Newtown, Leominster, Herefordshire	Leominster	1	Application for Prior Approval for proposed change of use of existing;hen house and Dutch barn (and lean-to) into dwelling house and car;port.	0	0	0
161511	Ground Floor, 1 Cygnus House, Black Swan Walk, Leominster, Herefordshire	Leominster	1	Propose to convert the ground floor of this property into a self;contained 1 person studio apartment.	0	0	0
143541	Westcroft Cottage, Hyde Ash, Leominster, Herefordshire, HR6 0JS	Leominster	1	Proposed demolition of Westcroft Cottage and replace with new dwelling;and garage store and proposed change of use of agricultural land to;residential curtilage.	0	1	0
160509	1 Cygnus House, Black Swan Walk, Leominster, Herefordshire	Leominster	1	Proposed conversion of the first floor of the existing office into a;one bedroom self contained flat.	0	0	0
142841	The Orangery, Vicarage Street, Leominster, Herefordshire, HR6 8DS	Leominster	1	Proposed conversion of existing two storey coach house to ground floor;art gallery with studio flat above	0	0	0
Total			13				

13 completions . 2
 losses = 11
 completions (net)

SUMMARY OF
 COMPLETIONS FOR
 THE PARISH OF
 LEOMINSTER(NET)

2011/12	50
2012/13	15
2013/14	23
2014/15	14
2015/16	15
2016/17	11
TOTAL	128

Latham, James

From: Banks, Samantha
Sent: 11 June 2018 13:46
To: Latham, James
Subject: FW: Leominster NDP queries

From:
Sent: 30 May 2018 17:55
To: Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>; Paul Russell
<townclerk@leominstertowncouncil.gov.uk>
Subject: RE: Leominster NDP queries

Dear Sam and Paul

Thank you for your responses. It would be helpful if responses from the Town Council are channeled through the local planning authority as requested in my introductory letter.

To confirm, while the evidence paper was only produced after the regulation 16 consultation with the intention of providing evidence to address issues raised by Herefordshire Council, it is clearly the type of evidence that should accompany the Plan, to enable those commenting on it to see the rationale for the policies. As well as information on housing commitment it also includes justification for the proposed Local Green Spaces, which is additional to the information included in the Plan.

One of the guiding principles for the examination of neighbourhood plans is that the process should be open. It is therefore important that those who wish to comment on the Plan have access to the evidence that supports it. There should not be material that is accessible to some parties and not others. While it was available on the Leominster Council site it was not available at the time of the regulation 16 consultation. I have therefore concluded that it is necessary to post it on the Herefordshire Council site and allow time for interested parties to comment on it.

It would therefore be helpful for the document to be accurate and consistent and for it to be clear which date the information in it applies to.

Kind Regards

Richard High

Latham, James

From: Banks, Samantha
Sent: 11 June 2018 13:47
To: Latham, James
Subject: FW: Leominster NDP queries

From:
Sent: 30 May 2018 10:38
To: Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>; 'Paul Russell'
<townclerk@leominstertowncouncil.gov.uk>
Subject: RE: Leominster NDP queries

Dear Sam,

While I understand that it may take some time to respond to the details points that I have raised, it is important to clarify the status of the Evidence Statement as I requested in my first paragraph. The only indication as to its date is a reference to February 2018 at the end of Appendix One. It appears to me that this is a document that was not available at the time of the regulation 16 consultation. It provides basic evidence in support of two of the most contentious policy areas of the Plan, that could reasonably have been expected to have been included in the submission documents.

While I appreciate that this document can be accessed from the Leominster Town Council website, it is my view that this document should be posted on the Herefordshire website with the submission documents and brought to the attention of those who responded to the submission version of the Plan, so that they may have an opportunity to comment on it. As it is a document that provides evidence that would normally be included with the documents subject to regulation 16 consultation, it should be posted for a period of 6 weeks. It would clearly be helpful if the inconsistencies within the document which were set out in my e mail of 15th May could be addressed before the document is posted to avoid any confusion that may cause. It would also be helpful if the status of the document and the reason for its production could be clarified when it is posted.

I appreciate that this will cause some delay in the completion of the examination.

Kind Regards

Richard

Latham, James

From: Banks, Samantha
Sent: 11 June 2018 13:50
To: Latham, James
Subject: FW: Leominster NDP queries

From: richardhigh5@btinternet.com [mailto:richardhigh5@btinternet.com]
Sent: 30 May 2018 10:38
To: Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>; 'Paul Russell'
<townclerk@leominstertowncouncil.gov.uk>
Subject: RE: Leominster NDP queries

Dear Sam,

While I understand that it may take some time to respond to the details points that I have raised, it is important to clarify the status of the Evidence Statement as I requested in my first paragraph. The only indication as to its date is a reference to February 2018 at the end of Appendix One. It appears to me that this is a document that was not available at the time of the regulation 16 consultation. It provides basic evidence in support of two of the most contentious policy areas of the Plan, that could reasonably have been expected to have been included in the submission documents.

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I appreciate that this will cause some delay in the completion of the examination.

Kind Regards

Richard

From: Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>
Sent: 25 May 2018 11:14
To: Paul Russell <townclerk@leominstertowncouncil.gov.uk>; 'richardhigh5@btinternet.com'
<richardhigh5@btinternet.com>
Subject: RE: Leominster NDP queries

Good Morning Paul,

I have yet to receive any feedback from the examiner's responses send on Monday.

Please could you let me know when any comments are likely to be available so the examination can progress.

Kind regards

Sam

From: Paul Russell [<mailto:townclerk@leominstertowncouncil.gov.uk>]
Sent: 21 May 2018 08:57
To: 'richardhigh5@btinternet.com' <richardhigh5@btinternet.com>; Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>
Subject: RE: Leominster NDP queries

Hi both,

My apologies, I have been snowed under with end of year financial close downs etc and this week is not looking much better.

I will try to respond to the queries by the end of play tomorrow.

Regards

Paul

Paul Russell
Town Clerk
Leominster Town Council
11 Corn Square
Leominster
HR6 8YP

Tel: 01568 611734
Mob: 07772 657446

From: richardhigh5@btinternet.com [<mailto:richardhigh5@btinternet.com>]
Sent: 19 May 2018 09:38
To: 'Banks, Samantha'; Paul Russell
Subject: RE: Leominster NDP queries

Many Thanks Sam

Are the questions set in the e mail of 15 May being addressed?

Richard

From: Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>
Sent: 16 May 2018 14:51
To: richardhigh5@btinternet.com; Paul Russell <townclerk@leominstertowncouncil.gov.uk>
Subject: RE: Leominster NDP queries

Dear Richard,

The Core Strategy indicates 2,300 new homes within Leominster during the plan period.

Proportional growth in accordance with Policy RA2 was worked out on a parish basis, these three settlements fall within the parish of Leominster. With this in mind, and given the extent of the growth already indicated within Policy LO1, these three settlements were not given as specific proportional growth requirement. Leominster Town Council were given the flexibility to determine whether any of the 2300 was directed towards all or any of these

settlement. This was in line with the approach indicated to other parishes with multiple settlements within para 4.8.21 of the Core Strategy.

Kind regards

Sam

Herefordshire.gov.uk

Samantha Banks
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Neighbourhood Planning Team
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HR4 0LE

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From: richardhigh5@btinternet.com [<mailto:richardhigh5@btinternet.com>]
Sent: 16 May 2018 10:35
To: Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>; Paul Russell <townclerk@leominstertowncouncil.gov.uk>
Subject: FW: Leominster NDP queries

Dear Sam

Further to the e mail below, Does the Core Strategy policy require 2300 dwellings in Leominster itself plus proportionate growth in the three settlements of Ivington, Brierley and Wharton, or is the requirement for 2300 in the parish to which proportionate growth in the three other settlements would make a contribution. The supporting text to Policy RA2 indicates that where there are several rural settlements in one parish there is flexibility as to how the growth is distributed between them, but it does not provide guidance on the approach where there are rural settlements within a parish containing a market town. While the numerical implications are small they do affect the tables referred to below and thus the scale of any residual need.

Kind Regards

Richard

From: richardhigh5@btinternet.com <richardhigh5@btinternet.com>
Sent: 15 May 2018 16:11
To: 'Banks, Samantha' <Samantha.Banks2@herefordshire.gov.uk>
Cc: 'Paul Russell' <townclerk@leominstertowncouncil.gov.uk>
Subject: RE: Leominster NDP queries

Dear Sam

Thank you for the response below. I have some further queries:

I assume that the "Housing background report" you refer to is the "Leominster Area Neighbourhood Plan Evidence Statement" which is referred to on the Leominster Town Council website. I should be grateful if you could clarify the status of this as it is not dated, though Appendix 1 to it refers to notes dated February 2018. This is clearly important evidence, but it does not seem to have been part of the documentation which was subject to the regulation16 consultation and it is not referred to in any of that documentation.

In the interests of accuracy I am trying to reconcile a number of inconsistencies within the information on housing commitments in the Evidence Base and between the Evidence Base and the table in the Plan. While these are small, they do have implications for the dwelling requirement, it will be helpful to have consistent numbers within the Plan and its supporting documents.

1. Page 13 refers twice to a need identified by the Core Strategy for a minimum of 2,500 new homes for Leominster. This appears to be an error as the HCS says 2,300.
2. The table in the Evidence Statement is clearly fuller than that on pages 30/31 and I have therefore regarded that as the more up to date statement of commitment.
3. Figures of 425, 424 and 414 have been used for Barons Cross. From paragraph 3.2 of the evidence base it would appear that 414 is the correct figure.
4. The introduction to the table of completions on Page 3 of the Evidence Base says 128 completions but the Table in paragraph 3.3 says 129, which appears to be the up to date figure.
5. The table in Paragraph 3.4 uses the figure of 644 permissions notwithstanding the adjustment at Baron's Court, which according to Paragraph 3.2 would make the actual commitments total 634. If this is the case the additional dwelling requirement would be 37 rather than 27 dwellings.
6. The Total figure in the table in paragraph 3.5 states that 24 dwellings have been approved. Paragraph 3.6 says that 19 dwellings have been approved and by adding up those which say "yes" it appears that the correct figure is 23.
7. Paragraph 3.6 also adds the dwellings awaiting approval to those permitted in order to reach the conclusion that sufficient houses have been provided for. This assumes that all of these applications will be approved, which may not be the case. Also this calculation seems to be based on an additional requirement of 38 (almost the same as my calculation in 4 above) rather than the 27 identified in paragraph 3.2.

I should be grateful if you and the Parish Council could check these figures and let me have a joint response as to whether my interpretation is correct.

The wording of Policy LANP 3 and the supporting text is confusing in several respects. Is it intended that the criteria in the policy should apply to the SUE – if not why not? Should the reference to the "previously developed site at Baron's Cross" refer to the "permitted site for 414 dwellings at Baron's Cross? It is not clear why any development granted in the exceptional circumstances referred to at the top of page 30 should only be required to comply with criterion b).

In relation to criterion e. Are there any published parking standards for Herefordshire?

Kind Regards

Richard

From: Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>
Sent: 10 May 2018 14:25
To: richardhigh5@btinternet.com
Cc: Paul Russell <townclerk@leominstertowncouncil.gov.uk>
Subject: RE: Leominster NDP queries

Dear Richard,

Please find attached the Herefordshire Council responses to the queries which you have posed, I have consulted colleagues within the Strategic Planning Team for advice with regards to the CS policy interpretation and housing figures.

I note that you have already received comments from Leominster Town Council directly.

Policy LANP1.

Query: Policy LANP1 refers to a new road linking the A44 at Barons' Cross and the A49 south-east of the town. This appears to be inconsistent Core Strategy Policy number LO2 which refers to "Leominster relief road linking the Worcester Road roundabout directly to the A44, to help relieve traffic congestion within the town and improve air quality in the Bargates area." Is there a reason for this?

Response: This is referring to the same element of infrastructure. Worcester Road roundabout is the junction of A49 and A44. The descriptions are slightly different but there is a significant inconsistency. The map on page 12 gives clarity that the eastern terminus of the new road is, regardless of the choice of words, the same place; as to reason the NDP has not used the same script as the Core Strategy.

Query: Neither Policy LO2 or Policy LANP1 are explicit on the relationship between the Link Road and the SUE. Is the SUE dependent on the construction of all or part of the Link Road? Is there a risk that difficulties in defining a funding mechanism for the relief road will prevent completion of the SUE during the plan period?

Response: The Core Strategy anticipates the road being brought forward concurrent with the housing development (see Core Strategy appendix 5 serial 16 – page 57 of Core Strategy Appendices) with recognition of continuation to explore funding mechanisms with LEP, HCA and Herefordshire Council. In my view the site is only likely to be viable if an element of housing is delivered as the road is progressed (rather than after the completion of the road). The delivery of the SUE requires the totality of the proposed road, and vice versa. However both elements (SUE and road) can be phased and these phases need not necessarily at any point always be codependent (one may be more or less advanced than the other), providing that sufficient access is afforded to the new housing development as it emerges. The economics of the road as a piece of enabling infrastructure for the SUE were fully examined during the examination of the Core Strategy, and they were found sound, therefore there is no foreseeable risk that the SUE can't be delivered within the plan period. Since the adoption of the Core Strategy the landowner developer have proved reluctant to enter discussions regarding the funding of the road through developer contributions. However, the Council are continuing to have positive discussions with the HCA

Query: Policy LANP 1 includes the statement that "The eastern section of the SUE will be the first phase with active travel links to the town centre." Is there any evidence or justification for this statement.

Response: The western edge of the SUE will add traffic onto the Bargates area which is the area which suffers most from congestion and problems with air quality. So from this point of view there is a justification. However, not aware of any detailed evidence that indicates that prevents any development from being delivered prior at the western edge of the site and the HCS does not suggest this.

Policy LANP2

Query: LANP2 Criterion n refers to the “nutrient management plan” There is no explanation of what this is or what it relates to, but from the SEA and elsewhere in the Plan I believe it relates to the River Wye SAC and that the valley of the River Lugg is included in this?

Response: The Nutrient Management Plan was prepared by the Environment Agency (EA) and Natural England (NE). The Plan identifies actions that achieve the phosphorous conservation target of the River Wye SAC.

A key element of the supporting information for growth targets in the Herefordshire Core Strategy was the Nutrient Management Plan (NMP). The NMP had been developed in a way which took into account proposed development growth within Herefordshire and Powys and it demonstrated that the levels of development proposed in the Core Strategy are deliverable over the Plan period whilst achieving and maintaining Favourable Condition Status for the River Wye SAC. The inclusion within the Core Strategy of policies such as SS3 and SD4 complement the NMP measures.

The River Lugg forms part of the River Wye SAC from a point close to Bodenham some 3-4 miles south of Leominster to its confluence with the River Wye at Hereford. More details regarding the NMP can be viewed on Herefordshire Council website at:

https://www.herefordshire.gov.uk/downloads/download/102/nutrient_management_plan

Query: LANP2 Criterion o refers to Cockcroft Hill and land to the west and there is a reference in in CS Policy LO2 to “the highly sensitive landscape areas and geological features of Cockcroft Hill (which encompasses Ryelands Croft)”. These areas are not defined, other than the symbol for a local geological site on the Leominster Town Policies Map and the much more extensive area on the map of proposed Local Green Spaces relating to Policy LANP11. Is there an agreed view on the extent of the areas referred to in Policy LO2?

Response: Cockcroft Hill has been long recognized as an important feature of the town particularly as viewed from the south. However, there is not an agreed view on the extent of Cockcroft Hill and am not aware of a detailed justification of the extensive area shown in LANP11 . In the absence of a policy such as LANP11 the area would have been identified through an agreed masterplan probably prepared by the developer (in conjunction with Herefordshire Council). I’m not certain that the landowner/developer were engaged in identifying the extent of this area.

Policy LANP3

Query: There is some conflict between the supporting text of the HC and the views expressed by HC in its Progression to Examination document for the LANP. Paragraph 4.6.8 of the CS states that “The land south of Leominster is sufficient not only to meet the housing target for the current plan period but is also likely to help meet the housing needs of the town through further development post 2031 supported by new highway infrastructure and community facilities”. However the Progression to Examination document asks “is there evidence to show that this residual requirement can be met through the policies of this plan and within the settlement boundary.” Is there an explanation for this apparent conflict?

Response: The Core Strategy anticipated that 1500 dwellings could be completed on the SUE by 2031 but that its overall capacity was greater than 1500 and its development could continue into subsequent plan periods. This recognized the local housing market would be unlikely to deliver more on this site within the lifetime of the plan. My understanding is that the Progression to Examination document provides evidence of how the HCS target of 2300 can be delivered on the basis of the SUE providing 1500 and taking into account outstanding commitments and potential opportunities within the settlement boundary. I’m not sure that there is necessarily a conflict as long as the NDP provides robust evidence to demonstrate the target can be achieved. The Town Council have produced a housing background report which contains their evidence of meeting the requirement.

Query: Also, The comments of HCC also suggest that existing commitments total 644 dwellings rather than 587 dwellings. Is the figure of 644 agreed? If so can it be evidenced?

Response: See attached spreadsheet. These are the housing land figures from April 2017 which indicate commitments of 645. April 2018 figures have yet to be compiled.

Query: Also, Policy LANP 3 refers to “small scale developments”. Small scale is not defined but Policy LO1 of the HCS refers to strategic sites, which are defined in the glossary as sites of around 100 dwellings or more, and smaller sites. Is it reasonable to infer from this that small scale means up to around 100 dwellings?

Response: The Core Strategy indicates that sites of over 100 dwellings within market towns are considered strategic. The inference being that any allocations between 1 and 99 should be included within the NDP. The definition of ‘small scale’ in terms of Policy LANP3 is a matter for the NDP group to define within their policy justification.

Hope you found these responses useful and if you have any further queries, please let me know.

Kind regards

Sam

Herefordshire.gov.uk

Samantha Banks
Neighbourhood Planning Team Leader
Neighbourhood Planning Team
Herefordshire Council
Plough Lane
Hereford
HR4 0LE

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From: richardhigh5@btinternet.com [<mailto:richardhigh5@btinternet.com>]

Sent: 08 May 2018 16:07

To: Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>

Cc: Paul Russell <townclerk@leominstertowncouncil.gov.uk>

Subject: Leominster queries

Dear Sam

I did not receive any comments from Leominster Town Council on the comments submitted in response to the regulation 16 consultation by the deadline of 27th April.

I have the following queries with regard to the Leominster Area Neighbourhood Plan.

I have a general concern that for many of the policies there is either no explicit justification or only very brief justification with very little detailed evidence presented to support the policies. Many of my questions relate to this.

Policy LANP1.

Policy LANP1 refers to a new road linking the A44 at Barons' Cross and the A49 south-east of the town. This appears to be inconsistent Core Strategy Policy number LO2 which refers to "Leominster relief road linking the Worcester Road roundabout directly to the A44, to help relieve traffic congestion within the town and improve air quality in the Bargates area." Is there a reason for this?

Neither Policy LO2 or Policy LANP1 are explicit on the relationship between the Link Road and the SUE. Is the SUE dependent on the construction of all or part of the Link Road? Is there a risk that difficulties in defining a funding mechanism for the relief road will prevent completion of the SUE during the plan period?

Policy LANP 1 includes the statement that "The eastern section of the SUE will be the first phase with active travel links to the town centre." Is there any evidence or justification for this statement.

Policy LANP2

Criterion n refers to the "nutrient management plan" There is no explanation of what this is or what it relates to, but from the SEA and elsewhere in the Plan I believe it relates to the River Wye SAC and that the valley of the River Lugg is included in this?

Criterion o refers to Cockcroft Hill and land to the west and there is a reference in in CS Policy LO2 to "the highly sensitive landscape areas and geological features of Cockcroft Hill (which encompasses Ryelands Croft)". These areas are not defined, other than the symbol for a local geological site on the Leominster Town Policies Map and the much more extensive area on the map of proposed Local Green Spaces relating to Policy LANP11. Is there an agreed view on the extent of the areas referred to in Policy LO2?

Policy LANP3

There is some conflict between the supporting text of the HC and the views expressed by HC in its Progression to Examination document for the LANP. Paragraph 4.6.8 of the CS states that "The land south of Leominster is sufficient not only to meet the housing target for the current plan period but is also likely to help meet the housing needs of the town through further development post 2031 supported by new highway infrastructure and community facilities". However the Progression to Examination document asks "is there evidence to show that this residual requirement can be met through the policies of this plan and within the settlement boundary." Is there an explanation for this apparent conflict? Also, The comments of HCC also suggest that existing commitments total 644 dwellings rather than 587 dwellings. Is the figure of 644 agreed? If so can it be evidenced?

Also, Policy LANP 3 refers to "small scale developments". Small scale is not defined but Policy LO1 of the HCS refers to strategic sites, which are defined in the glossary as sites of around 100 dwellings or more, and smaller sites. Is it reasonable to infer from this that small scale means up to around 100 dwellings?

I have a few days break from now until 14th May. No doubt there will be further queries on my return.

Kind Regards

Richard

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Latham, James

From: Banks, Samantha
Sent: 11 June 2018 13:26
To: Latham, James
Subject: FW: Leominster NDP queries

[A copy of this email needs to go on the website](#)

From:
Sent: 08 June 2018 10:08
To: Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>; 'Paul Russell'
<townclerk@leominstertowncouncil.gov.uk>
Subject: RE: Leominster NDP queries

Dear Sam

Thank you very much for this and I am happy with these arrangements and will await the end of the consultation period before concluding my examination..

I have just one further query at this stage:

Herefordshire Council has pointed out that the Town Centre Policies Map does not show any primary or secondary shopping frontage on the south side of Victoria Street, the north side of Corn Street or the east side of High Street between Corn Street and Victoria Street. From my site visit it would appear that this must be an error, but can the Town Council confirm this and if so which areas should be defined as primary or secondary?

Kind regards

Richard