

HOLMER AND SHELWICK NEIGHBOURHOOD PLAN

Submission Draft Version

**A report to Herefordshire Council
into the examination of the
Holmer and Shelwick Neighbourhood Plan
by Independent Examiner, Rosemary Kidd**

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1.0 Summary

- 1.1 The Holmer and Shelwick Neighbourhood Plan has been prepared to set out the community's wishes to ensure that the area will have grown proportionally but will remain a rural parish. The parish contains the villages of Holmer, Munstone and Shelwick and surrounding countryside.
- 1.2 The Plan sets out policies that support and complement those in the Herefordshire Core Strategy that identify a comprehensively planned sustainable urban expansion at Holmer West. I have made a number of recommendations in this report in order to make the wording of the policies and their application clearer including improvements to the mapping of sites referred to in policies to ensure that the Plan meets the Basic Conditions. Section 6 of the report sets out a schedule of the recommended modifications.
- 1.3 The main recommendations concern:
- Revision to the settlement boundary of Holmer to include the site of Holmer House Farm that has received planning permission for housing development;
 - The deletion of Policy HS4;
 - The deletion of Local Green Space sites 3, 4, 6, 7, 8 and 9;
 - Clarification of the wording of policies and the supporting text; and
 - Improvements and corrections to the mapping of policies.
- 1.4 Subject to the recommended modifications being made to the Neighbourhood Plan, I am able to confirm that I am satisfied that the Holmer and Shelwick Neighbourhood Plan satisfies the Basic Conditions and that the Plan should proceed to referendum.

2.0 Introduction

Background Context

- 2.1 This report sets out the findings of the examination into the Holmer and Shelwick Neighbourhood Plan (referred to as the HSNP throughout this report).
- 2.2 Holmer and Shelwick parish lies two miles north of Hereford within the boundary of Herefordshire Council (HC). It is a rural parish on the edge of Hereford containing the historic villages of Holmer, Munstone and Shelwick. There are 13 listed buildings and scheduled ancient monuments. At 2011 there were 1386 people living in Holmer and Shelwick in 535 households.

Appointment of the Independent Examiner

- 2.3 I was appointed as an independent examiner to conduct the examination on the HSNP by HC with the consent of Holmer and Shelwick Parish Council in October 2019. I do not have any interest in any land that may be affected by the HSNP nor do I have any professional commissions in the area currently and I possess appropriate qualifications and experience. I am a Member of the Royal Town Planning Institute with over 30 years' experience in local authorities preparing Local Plans and associated policies.

Role of the Independent Examiner

- 2.4 As an independent Examiner, I am required to determine, under paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, whether the legislative requirements are met:
 - The Neighbourhood Plan has been prepared and submitted for examination by a qualifying body as defined in Section 61F of the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004;
 - The Neighbourhood Plan has been prepared for an area that has been designated under Section 61G of the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004;
 - The Neighbourhood Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provisions relating to 'excluded development', and must not relate to more than one Neighbourhood Area); and
 - The policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of the Planning and Compulsory Purchase Act 2004 Section 38A.

- 2.5 An Independent Examiner must consider whether a neighbourhood plan meets the “Basic Conditions”. The Basic Conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The Basic Conditions are:
1. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
 2. the making of the neighbourhood plan contributes to the achievement of sustainable development;
 3. the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 4. the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations; and
 5. prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. The following prescribed condition relates to neighbourhood plans:
 - Regulation 32 of the Neighbourhood Planning (General) Regulations 2012 (as amended) sets out a further Basic Condition in addition to those set out in the primary legislation. That the making of the neighbourhood plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2012) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007) (either alone or in combination with other plans or projects). (See Schedule 2 to the Neighbourhood Planning (General) Regulations 2012 (as amended)).
- 2.6 Under the terms of the neighbourhood planning legislation I am required to make one of three possible recommendations:
- That the plan should proceed to referendum on the basis that it meets all the legal requirements;
 - That the plan should proceed to referendum if modified; or
 - That the plan should not proceed to referendum on the basis that it does not meet all the legal requirements.
- 2.7 If recommending that the Neighbourhood Plan is submitted to referendum my report must also recommend whether the area for the referendum should extend beyond the neighbourhood area to which the Neighbourhood Plan relates, and if to be extended, the nature of that extension.
- 2.8 The role of an Independent Examiner of a neighbourhood plan is defined. I am not examining the test of soundness provided for in respect of examination of Local Plans. It is not within my role to comment on how the

plan could be improved but rather to focus on whether the submitted Neighbourhood Plan meets the Basic Conditions and Convention rights, and the other statutory requirements.

- 2.9 It is a requirement that my report must give reasons for each of its recommendations and contain a summary of its main findings. I have only recommended modifications to the Neighbourhood Plan (presented in bold type) where I consider they need to be made so that the plan meets the Basic Conditions and the other requirements.

The Examination Process

- 2.10 The presumption is that the neighbourhood plan will proceed by way of an examination of written evidence only. However the Examiner can ask for a public hearing in order to hear oral evidence on matters which he or she wishes to explore further or so that a person has a fair chance to put a case.
- 2.11 I have sought clarification on a number of factual matters from the qualifying body and/or the local planning authority in writing. I am satisfied that the responses received have enabled me to come to a conclusion on these matters without the need for a hearing.
- 2.12 I had before me background evidence to the plan which has assisted me in understanding the background to the matters raised in the Neighbourhood Plan. I have considered the documents set out in Section 5 of this report in addition to the Submission draft of the Holmer and Shelwick Neighbourhood Plan dated July 2019.
- 2.13 I have considered the Basic Conditions Statement and the Consultation Statement as well as the screening reports for the Strategic Environmental Assessment and Habitats Regulation Assessment and the Environment Report. In my assessment of each policy I have commented on how the policy has had regard to national policies and advice and whether the policy is in general conformity with relevant strategic policies, as appropriate.
- 2.14 I have undertaken an unaccompanied visit to the Plan area and viewed the sites referred to under the policies in the plan.

Legislative Requirements

Qualifying Body

- 2.15 Paragraph 2.1 of the Basic Conditions Statement confirms that the neighbourhood plan making process has been led by Holmer and Shelwick Parish Council which is a “qualifying body” under the Neighbourhood Planning legislation which entitles them to lead the plan making process. The Plan was prepared by the Neighbourhood Plan Steering Group.
- 2.16 I am satisfied that the requirements set out in the Localism Act (2011) and in Section 61F(1) and (2) of the Town and Country Planning Act (as applied to

neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act) have been met.

The Plan Area

- 2.17 Paragraph 2.5 of the Basic Conditions Statement confirms that the Neighbourhood Plan area is co-terminus with the parish of Holmer and Shelwick. Paragraph 1.1 of the Plan states that the area was approved by HC on 22 February 2017. The Basic Conditions Statement confirms that there are no other neighbourhood plans relating to that area.
- 2.18 This satisfies the requirements of preparing a Neighbourhood Development Plan under section 61G (1) (2) and (3) of the Town and Country Planning Act 1990 (as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004) and regulations 5, 6 and 7 of the Neighbourhood Planning (General) Regulations 2012.

Plan Period

- 2.19 A neighbourhood plan must specify the period during which it is to have effect. The front cover of the Plan does not state the lifespan of the Neighbourhood Plan. Paragraph 2.3 of the Basic Conditions Statements confirms that is the same period as the Core Strategy 2011 – 2031.
- 2.20 It is recommended that the plan period is shown on the front page of the plan and that it should be from the date the plan is made.

Recommendation 1: Show the Plan period on the front cover of the HSNP with the start date from the date the plan is made.

Excluded Development

- 2.21 The Plan does not include provision for any excluded development: county matters (mineral extraction and waste development), nationally significant infrastructure or any matters set out in Section 61K of the Town and Country Planning Act 1990.

Development and use of land

- 2.22 The Neighbourhood Development Plan should only contain policies relating to development and use of land. Subject to the modifications proposed, the HSNP would be compliant with this requirement of Section 38B of the Planning and Compulsory Purchase Act 2004 as amended.
- 2.23 I am satisfied therefore that the Holmer and Shelwick Neighbourhood Plan satisfies all the legal requirements set out in paragraph 2.4 above.

The Basic Conditions

Basic Condition 1 – Has regard to National Policy

- 2.24 The first Basic Condition is for the neighbourhood plan “to have regard to national policies and advice contained in guidance issued by the Secretary of State”. The requirement to determine whether it is appropriate that the plan is made includes the words “having regard to”. This is not the same as compliance, nor is it the same as part of the test of soundness provided for in respect of examinations of Local Plans which requires plans to be “consistent with national policy”.
- 2.25 The Planning Practice Guidance assists in understanding “appropriate”. In answer to the question “What does having regard to national policy mean?” the Guidance states a neighbourhood plan “must not constrain the delivery of important national policy objectives.”
- 2.26 In considering the policies contained in the Plan, I have been mindful of the guidance in the Planning Practice Guide (PPG) that:
- “Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like.”*
- 2.27 In order to ensure that a neighbourhood plan can be an effective tool for the decision maker, the PPG advises that:
- “A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”*
- 2.28 The NPPF of February 2019 is referred to in this examination in accordance with paragraph 214 of Appendix 1, as the plan was submitted to the Council in July 2019.
- 2.29 The Planning Practice Guidance on Neighbourhood Plans states that neighbourhood plans should “*support the strategic policies set out in the Local Plan or spatial development strategy and should shape and direct development that is outside of those strategic policies*” and further states that “*A neighbourhood plan should, however, contain policies for the development and use of land. This is because, if successful at examination and referendum, the neighbourhood plan becomes part of the statutory development plan.*”

- 2.30 The Basic Conditions Statement briefly summarises how the Overarching objectives of the national planning policies and the Plan Making Framework have been taken into account in preparing the HSNP.
- 2.31 I consider the extent to which the policies of the plan meet this Basic Condition No 1 in Section 3 below.

Basic Condition 2 - Contributes to sustainable development

- 2.32 A qualifying body must demonstrate how a neighbourhood plan contributes to the achievement of sustainable development. The NPPF as a whole constitutes the Government's view of what sustainable development means in practice for planning. The NPPF explains that there are three dimensions to sustainable development: economic, social and environmental.
- 2.33 There is no legal requirement for a formal Sustainability Appraisal to be carried out in respect of neighbourhood plans. However good practice suggests that where neighbourhood plans are allocating land for development an appraisal should be carried out.
- 2.34 Table 1 of the Basic Conditions Statement considers how the HSNP contributes to the delivery of sustainable development with regards to economic, social and environmental aspects. Taking account of the information presented, I am satisfied that the HSNP contributes to the delivery of sustainable development.

Basic Condition 3 – is in general conformity with strategic policies in the development plan

- 2.35 The third Basic Condition is for the neighbourhood plan to be in general conformity with the strategic policies contained in the Development Plan for the area. The adopted strategic policies covering the Neighbourhood Plan area are contained in Herefordshire Local Plan Core Strategy which was adopted in October 2015.
- 2.36 The Hereford Area Plan is at an early stage of preparation. This is considering the options for housing and employment sites in and around Hereford to deliver the strategic requirements identified in the Core Strategy. This is at an early stage of development with the housing and employment site options consulted on between August and October 2018.
- 2.37 The Basic Conditions Statement identifies the strategic policies of the adopted Local Plan relevant to each policy of the HSNP.
- 2.38 The Council raised concerns over general conformity of Policies HS2 and HS8 with the strategic policies of the development plan. I consider in further detail in Section 3 below the matter of general conformity with the strategic policies of the plan.

Basic Condition 4 – Compatible with EU obligations and human rights requirements

- 2.39 A neighbourhood plan must be compatible with European Union obligations as incorporated into UK law, in order to be legally compliant. Key directives relate to the Strategic Environmental Assessment Directive and the Habitats and Wild Birds Directives. A neighbourhood plan should also take account of the requirements to consider human rights.
- 2.40 Regulation 15 of the Neighbourhood Planning Regulations as amended in 2015 requires either that a Strategic Environmental Assessment is submitted with a Neighbourhood Plan proposal or a determination from the responsible authority (HC) that the plan is not likely to have “significant effects.” The Holmer and Shelwick NDP has been subject to an iterative SEA screening process at all key stages of the plan’s preparation and an Environment Report dated July 2019 has been published.
- 2.41 The Environment Report dated July 2019 concluded in paragraph 6.9 that
“The policies in the Holmer and Shelwick NDP are not considered to be in direct conflict with or propose greater levels of growth and development than strategic policies contained in the Local Plan (Core Strategy), which themselves have undergone a full Sustainability Appraisal”.
- 2.42 Habitat Regulations Assessment (HRA) screening for the HSNP relies on the screening that has been carried out on Herefordshire Core Strategy. This considered the impact of the development in Herefordshire as a whole proposed in the Local Plan on the River Wye (including the River Lugg) SAC.
- 2.43 It concluded that *“development in the Herefordshire Local Plan will not have a likely significant effect on any internationally important wildlife sites either alone or in combination with other plans and projects. These conclusions are based on the findings of the AA screening which concludes that no Natura 2000 sites are located within the district and no impact pathways have been identified linking Natura 2000 sites outside of the district. Therefore an Appropriate Assessment is not required.”*
- 2.44 The HRA Screening was updated on the preparation of the submission draft HSNP in July 2019. It states that there are no specific site allocations and it provides general policies that clarify and provide more local detail to the Herefordshire Core Strategy. Therefore it requires a high level screening assessment to build upon the HRA Screening Assessment Report for the Herefordshire Core Strategy. This high level screening assessment should be read in combination with the Herefordshire Local Plan-Core Strategy Habitat Regulations Assessment Report and ensures that there will not be any significant impacts upon Natura 2000 sites and concludes at section 9.1 that:
“... it is concluded that the submission Holmer and Shelwick Parish NDP will not have a likely significant effect on the River Wye (including the River Lugg) SAC.”
- 2.45 No mitigation measures have been included within the screening of the policies of the HSNP.

- 2.46 The statutory environmental bodies: Historic England, Natural England and the Environment Agency were consulted on the SEA and HRA Screening Reports in October 2017. Consultation on the final reports was undertaken alongside the Regulation 16 Consultation. Natural England confirmed that they agreed with the conclusion of the HRA screening.
- 2.47 With regard to Human Rights, the Basic Conditions Statement states that:
- “The Submission Neighbourhood Plan is fully compatible with the European Convention on Human Rights. It has been prepared with full regard to national statutory regulation and policy guidance, which are both compatible with the Convention. The Plan has been produced in full consultation with the local community. The Plan does not contain policies or proposals that would infringe the human rights of residents or other stakeholders over and above the existing strategic policies at national and district-levels.”*
- 2.48 From the evidence provided in this assessment and the Consultation Statement, I am satisfied that the plan makers have sought to consult the whole community and have taken their views into consideration in preparing the HSNP. I am satisfied that the Plan has met the requirements of the Human Rights Act.
- 2.49 I am not aware of any other European Directives which apply to this particular Neighbourhood Plan and no representations at pre or post-submission stage have drawn any others to my attention. Taking all of the above into account, I am satisfied that the HSNP is compatible with EU obligations and therefore with Basic Conditions Nos 4 and 5.

Consultation on the Neighbourhood Plan

- 2.50 I am required under The Localism Act 2011 to check the consultation process that has led to the production of the Plan. The requirements are set out in Regulation 14 in The Neighbourhood Planning (General) Regulations 2012.
- 2.51 The Consultation Statement sets out an overview of the various stages of consultation that have been carried out during the preparation of the HSNP.
- 2.52 Following the preparation of the Community-led Plan in 2016, work commenced on the HSNP in Spring 2018 with an informal consultation. This was publicised through a leaflet delivered to each household, online using the Parish Council web site, the Parish newsletter (Holmer and Shelwick Parish News) and posters put up throughout the neighbourhood area. An open day event was held on the 7th April 2018 at Holmer Parish Church Centre. 57 people attended the event,
- 2.53 Copies of the informal consultation draft were made available on-line. Comments were invited in writing and by email using a comment form. 52 responses, including those from the Open Day were received.
- 2.54 The Regulation 14 consultation on the pre-submission draft HSNP was published for formal consultation from 28th January -11th March 2019.

- 2.55 The consultation was publicised by a leaflet drop to every household. Copies of the plan and other materials were made available online and at Holmer Park Health Club, Holmer Vets, and Holmer Stores. Two drop-in sessions to discuss the plan and answer questions were held at Holmer Church Parish Centre on 6th and 23rd February. Statutory consultees were emailed.
- 2.56 Holmer and Shelwick Parish Council submitted their Neighbourhood Plan to HC on 29 July 2019. The Regulation 16 consultation ran from 30 July 2019 to 24 September 2019. Fifteen responses were received including one late one which has been accepted, received a day after the closing date.
- 2.57 A representation from a landowner affected by a proposed Local Green Space designation has stated that they would have appreciated a formal letter notifying the landowner of the proposed designation. It is good practice to notify landowners affected by proposals directly rather than relying on general publicity material. However, the landowner has been made aware of the proposals and has submitted representations and I am satisfied that their position has not been compromised.
- 2.58 I am satisfied that the pre-submission consultation and publicity has met the requirements of Regulations 14 and 15 of the Neighbourhood Planning (General) Regulations 2012.
- 2.59 This report is the outcome of my examination of the Submission Draft Version of the Holmer and Shelwick Neighbourhood Plan dated July 2019. I am required to give reasons for each of my recommendations and also provide a summary of my main conclusions. My report makes recommendations based on my findings on whether the Plan meets the Basic Conditions and provided the Plan is modified as recommended, I am satisfied that it is appropriate for the Neighbourhood Plan to be made. If the plan receives the support of over 50% of those voting, then the Plan will be made following approval by HC.

3.0 Neighbourhood Plan – As a whole

- 3.1 The Neighbourhood Plan is considered against the Basic Conditions in this section of the Report following the structure and headings in the Plan. Given the findings in Section 2 above that the plan as a whole is compliant with Basic Conditions No 4 (EU obligations) and other prescribed conditions, this section largely focuses on Basic Conditions No 1 (Having regard to National Policy), No 2 (Contributing to the achievement of Sustainable Development) and No 3 (General conformity with strategic policies of the Development Plan).
- 3.2 Where modifications are recommended, they are presented and clearly marked as such and highlighted in bold print, with any proposed new wording in italics.
- 3.3 Basic Condition 1 requires that the examiner considers whether the plan as a whole has had regard to national policies and advice contained in guidance issued by the Secretary of State. Before considering the policies individually, I have considered whether the plan as a whole has had regard to national planning policies and supports the delivery of sustainable development.
- 3.4 The Plan is succinct and focused on the policies; it is well presented with policies relating to housing, design, heritage, the economy, community infrastructure and local green spaces.
- 3.5 The Plan includes a map showing the boundary of the Plan area and clear Policies Maps showing most of the sites referred to in policies for the parish as a whole and for the villages of Holmer, Munstone and Shelwick. The maps are clear to enable plan users to identify the boundaries of sites referred to in policies.
- 3.6 All sites referred to in policies should be shown on the Policies Map. I have made recommendations under Policy HS5 about the mapping of the views and under Policy HS7 that the community facilities should be shown on the Policies Map. Site reference numbers or letters should be consistent in the policy and maps.
- 3.7 The Plan does not seek to allocate any sites for development and is relying on completions and commitments to deliver the housing requirement set in the Core Strategy. Settlement boundaries are defined around each settlement, however, no evidence has been provided to demonstrate that sufficient sites are available to deliver the housing requirement. Representations have been received requesting that additional land should be included. I will return to this matter under Policies HS1 and HS2.

The Neighbourhood Plan - Policies

Introduction

- 3.8 The Introductory sections set out the context for plan making and the key issues facing the area. The introduction helpfully sets out the strategic context from the Core Strategic notably the identification of the area to deliver the Northern Urban Expansion of Hereford.

Vision and Objectives

- 3.9 The lengthy Vision is set out in the Foreword to the Plan and in paragraph 5.13. This focuses on accommodating the required growth, working to establish a vibrant village centre, safeguarding the smaller communities and the countryside.
- 3.10 There are seven objectives which are taken forward into the policies in the Plan.

Housing Requirement

- 3.11 The NPPG states that when neighbourhood plans contain policies relevant to housing supply, these policies should take account of the latest and up-to-date evidence of housing need. It further states that where neighbourhood planning bodies have decided to make provision for housing in their plan, the housing requirement figure and its origin are expected to be set out in the neighbourhood plan as a basis for their housing policies and any allocations that they wish to make.
- 3.12 Paragraph 104 of the NPPG on Neighbourhood Planning states that *".....However, there is an expectation that housing requirement figures will be set in strategic policies, or an indicative figure provided on request. Where the figure is set in strategic policies, this figure will not need retesting at examination of the neighbourhood plan. Where it is set as an indicative figure, it will need to be tested at examination"*.
- 3.13 The approach to delivering new housing development in the Plan area is set out in the Core Strategy. Policy HD4 identifies the Northern Urban Expansion of Hereford at Holmer West for a comprehensively planned sustainable urban expansion of 500 new homes and associated infrastructure, sports and open space.
- 3.14 Core Strategy Policy RA1 identifies Munstone and Shelwick as "other settlements" where proportionate housing growth is appropriate. The growth target for the relevant housing area is 18% which would mean a growth of 99 homes for the whole parish. HC has proposed a proportional growth target of 17 new homes for Munstone and Shelwick for the period 2011 – 2031.

- 3.15 Following a call for sites, the emerging Hereford Area Plan is considering the options for housing and employment sites in and around Hereford to deliver the strategic requirements identified in the Core Strategy.
- 3.16 HC has confirmed that at the time of submitting the neighbourhood plan, a total of 510 homes were committed in the Plan area. Due to the number of homes already completed and committed within the plan area the plan makers determined that no further sites needed to be allocated through the HSNP.
- 3.17 Planning permission has been granted for 460 dwellings on land at Holmer West and development has commenced. Since the submission of the HSNP, planning permission was granted on 13 November 2019 for up to 100 houses at Holmer House Farm which lies outside the proposed settlement boundary. Together with other smaller sites in the plan area, it is considered that sufficient sites are available to deliver strategic Policy HD4 the Northern Urban Expansion. The HAP will consider whether any additional allocations would be required to achieve the full Core Strategy housing target for Hereford of 6500. If so, they will be allocated through the HAP.
- 3.18 I am satisfied that, subject to the recommended modification to the settlement boundary of Holmer (Recommendation 4), the HSNP provides for the housing requirement set out in the Core Strategy for the Northern Urban Expansion and the indicative requirement for the proportional growth of the villages of Shelwick and Munstone with sufficient flexibility to enable additional sites to come forward if required to meet a demonstrated local housing need.
- 3.19 As the Plan is defining settlement boundaries around the villages, it is considered to be a policy affecting the housing supply. To ensure that the Plan conforms to national policy requirements, it is recommended that the Plan's housing requirement should be made explicit in a policy that should also explain how the requirement is to be delivered: in this case through housing commitments and windfall development.

Recommendation 2: Include a new policy as follows:

“The HSNP will provide for about 500 new homes in Holmer and 17 new homes in Munstone and Shelwick to meet the housing needs of the parish over the plan period 2011 – 2031.

New housing will be supported on sites that lie within the Settlement Boundaries of Holmer, Munstone and Shelwick in accordance with other relevant policies of the development plan.

New housing will be delivered through:

- ***Dwellings which have planning consent at July 2019;***
- ***Windfall opportunities in accordance with Policies HS1 and HS2 and Core Strategy Policies RA2 – RA5, H2 and the NPPF.”***

POLICY HS1 New Housing Development in Munstone And Shelwick

- 3.20 The policy sets out the criteria to be used in considering proposals for new housing development in the villages of Munstone and Shelwick. Settlement boundaries are defined for the two villages.
- 3.21 Paragraph 6.2 of the HSNP confirms that the proportional growth target for the two villages was set out as 17 new homes between April 2011 and April 2031. There were 18 existing commitments at October 2017 and it has been agreed that the target has been met.
- 3.22 NPPF makes it clear that housing targets should not be viewed as maximum figures. I am satisfied that there is flexibility in the wording of Policy HS1 that would enable additional sites to come forward if necessary to meet a demonstrated local housing need, although I have recommended revisions to make the policy wording clearer.
- 3.23 The policy is worded that housing development to meet local needs within or adjacent to the settlement boundaries will be supported where the criteria are met. Paragraph 6.3 states that the policy allows “in certain circumstances for small scale development immediately adjacent to the settlement boundary”. However, the circumstances are not described or defined and the policy is therefore open to interpretation and could result in a number of small scale developments around the two small hamlets.
- 3.24 Core Strategy Policy RA2 supports sustainable housing growth in or adjacent to listed settlements including Shelwick and Munstone to enable development that has the ability to improve facilities and meet the needs of the communities concerned. The policy states that proposals for the delivery of local needs housing will be supported where they meet an identified need and their long-term retention as local needs housing is secured as such. Policy H2 sets out the provisions for local needs housing on rural exceptions sites outside settlement boundaries.
- 3.25 I have recommended revisions to the policy to clarify the policy wording and to ensure that development proposals adjacent to and outside the settlement boundary demonstrate that they meet local needs.
- 3.26 Representations have been received requesting that the settlement boundary be revised to the west to include land adjacent to the housing commitment west of Bannut Tree House and to the east to include the site to the east to the railway line including an infill site to the west of Merton and a site to the east of the railway line that has received permission. As the sites adjacent to the settlement boundary do not have planning permission, there is no reason to recommend that they should be included in the settlement boundary.
- 3.27 The wording and grammar of the criteria should be checked. The word “and” should be placed at the end of the penultimate criterion.

- a) Criterion a) is unnecessary as it repeats the requirement of the first paragraph.
- b) Criterion (f) is unnecessary as the policy wording requires development to be within or adjacent to the settlement boundary. It cannot therefore be isolated.
- c) Criterion (i) should be corrected to refer to the housing development “not being adversely impacted by existing agricultural or commercial activity”.

Recommendation 3: Revise Policy HS1 as follows:

Delete “or adjacent to” from the first paragraph.

Add the following after the first sentence: “*New housing development will be supported adjacent to and outside the settlement boundaries of Munstone and Shelwick where it delivers rural exceptions housing in accordance with Core Strategy Policy H2 and where it is evidenced through a local housing needs assessment.*”

Delete criteria a) and f).

Revise criterion i) to read: “*The proposed homes will not be adversely impacted by existing agricultural or commercial activity*”.

Check the wording and grammar of the criteria. Place “and” at the end of the penultimate criterion.

Add explanatory text at the end of paragraph 6.3 on the lines of “*Small scale housing development outside and adjacent to the settlement boundary will be supported where it delivers a mix of affordable and market housing to meet local needs in accordance with Core Strategy Policy H2.*”

POLICY HS2 New Housing Development in Holmer

- 3.28 Policy HS2 supports housing development within the settlement boundary of Holmer. Outside the settlement boundary housing development is to be assessed against Core Strategy Policy RA3. The policy also requires development within the Holmer settlement boundary to be laid out and designed to mitigate any adverse impact of road traffic noise.
- 3.29 The Holmer settlement boundary has been drawn up to accommodate the planned Northern Urban Expansion of Hereford including the site at Holmer West for 460 dwellings and the Park and Choose site. It includes the sites that have received planning permission at the time the HSNP was submitted and dwellings that have been completed since 2011.
- 3.30 HC has commented that should additional homes be required to help achieve the strategic housing requirement for Hereford, these will be allocated in the Hereford Area Plan (or subsequent Herefordshire Core Strategy review) and the settlement boundary will be revised accordingly. It is recommended a

paragraph should be added to the justification to explain the position that the Holmer settlement boundary provides sufficient land to deliver the Northern Urban Expansion including the Park and Choose site and that should any additional land be required to deliver the strategic housing requirement, this will be delivered through the HAP with a consequential revision of the settlement boundary.

- 3.31 A representation has been received stating that the site at Holmer House Farm should be included in the settlement boundary as delegated approval has been obtained subject to the completion of a section 106 agreement. HC has confirmed that planning permission was granted for this site on 13 November 2019 and it is recommended that the site should therefore be included in the settlement boundary. Another representation is seeking a greater degree of flexibility in the policy and suggests that the policy should be revised to refer to sites adjacent to the settlement boundary.
- 3.32 I consider that, subject to the recommended modification to the settlement boundary, sufficient land has been identified to deliver the Northern Urban Extension. Any additional land that may be required to deliver the strategic housing requirement will be allocated through the HAP. I can see no reason why greater flexibility should be introduced to the policy by allowing for development adjacent to the settlement boundary. As I have commented on Policy HS1 this should only be used exceptionally in lower tier settlements to facilitate development to meet evidenced local housing needs.
- 3.33 The last sentence of the first paragraph of the policy should be revised to be consistent with criterion i) of Policy HS1.
- 3.34 The first sentence of the second paragraph is an explanation to justify the requirement for mitigation measures for road traffic noise. It would be more appropriate to place it in the justification. It may be helpful to plan users to indicate in the justification the nature of the mitigation measures that may be preferred.

Recommendation 4: Revise Policy HS2 as follows:

Revise the last sentence of the first paragraph to read: “*The proposed homes will not be adversely impacted by existing agricultural or commercial activity*”.

Place the first sentence of the second paragraph in the justification. “Development sitesA4103”. Revise the last sentence of the policy to read: “The design and layout of sites must take into account.....”.

Add the following to the justification: “*The housing commitments included in the settlement boundary should deliver about 510 homes, sufficient to deliver the Northern Urban Extension of Hereford. A site for the Park and Choose site has been agreed within the settlement boundary to the north of Holmer House Farm adjacent to the A49. Should additional sites be required to help achieve the strategic*”

housing requirement for Hereford, these will be allocated in the Hereford Area Plan and the settlement boundary revised accordingly.”

Revise the settlement boundary on the Policies Map for Holmer to include the site at Holmer House Farm that has received planning permission for up to 100 homes.

POLICY HS3 Design

- 3.35 The policy sets out ten criteria to be taken into account in promoting good quality designs for new development in accordance with section 12 of the NPPF. The policy complements the various design policies in the Core Strategy in particular Policy SD1.
- 3.36 I have two areas of concern. Firstly that criterion b) seeks to set a local parking standard of one parking space per bedroom. This is higher for larger dwellings than that set in the 2006 Herefordshire Parking Standards which set maximum standards. Recent guidance in the 2019 NPPF paragraph sets out the matters to be taken into account in setting local parking standards in paragraph 105 including the accessibility of the development, the availability of and opportunities for public transport and local car ownership levels. Paragraph 106 states that *“Maximum parking standards for residential development should only be set where there is clear and compelling justification that they are necessary for managing the local road network or for optimising the density of development in locations that are well served by public transport.”*
- 3.37 In response to my question on the matter the QB has provided the following justification for seeking a higher parking standard: *“The parking criteria in the NDP are higher than those in the HC policy. The experience of the parking issues surrounding the recent housing development of approximately 300 dwellings at The Furlongs demonstrates that the current provisions are inadequate. The Furlongs development is woefully short of adequate parking during the evenings and weekends with cars parked on lawns and pavements blocking pedestrian access through the development. The NDP seeks to address this, especially for larger dwellings in future developments. We are a rural parish where the car is essential in daily life.”*
- 3.38 In the light of these observations, I am satisfied that there is a satisfactory justification for setting the higher parking standard in this area. The addition of a comma after “garages” would improve the grammar of the criterion.
- 3.39 My second concern is with criterion d) which states that “scale and height should vary across the site – with a maximum of two storeys to be the norm – with landmark buildings, sometimes larger....”. I consider that it is not clear how the height of buildings can be varied if two storeys is to be the norm. Nor is it clear how high landmark buildings could be.

- 3.40 During my site visit I observed that older housing in the parish was a mixture of bungalows and two storey dwellings. However, the newer development of The Furlongs was a mixture of two, two and a half and three storey homes. No evidence has been presented to me to explain why a similar mix of building heights should not be employed on other developments in the plan area.
- 3.41 I am therefore recommending that criterion d) should be revised to remove the norm of two storeys and to set the maximum at three storeys.

Recommendation 5: Revise Policy HS3 as follows:

Add a comma after “garages” in criterion b).

Revise criterion d) to read “Scale and height of buildings should vary across the site up to a maximum of three storeys, with landmark buildings occupying key positions, such as corners, on the site.”

POLICY HS4 Protecting Local Heritage Assets

- 3.42 The policy proposes the designation of two sites as local heritage assets and sets out a policy to manage development affecting heritage assets. Paragraph 6.6 is contradictory as it states that no other non designated heritage assets were identified. The sites are shown on Figure 10 but not on the Policies Map.
- 3.43 The NPPG on Heritage states that “*It is important that the decisions to identify sites as non-designated heritage assets are based on sound evidence.*” It goes on to state that “*This includes information on the criteria used to select non-designated heritage assets and information about the location of existing assets*”.
- 3.44 No evidence has been provided to describe the heritage significance of the two sites or to set out the criteria used to select them. In response to my question on the topic, HC has responded that “*there is no process in place for assessing and designating local heritage assets. Any buildings or sites indicated within a NDP are passed to the Historic Environment Record for recording. There is no criteria or uniformity across the county as a whole*”.
- 3.45 The QB has provided me with some comments about each site which I consider add little to understanding the significance of each site. The evidence provided is not convincing. The duckpond site is an attractive local feature and is proposed for designation as a Local Green Space. Its historic significance has not been demonstrated. Whilst the Trig point is located on one of the local hills, it is one of thousands throughout the country used for mapping purposes. There is no historic significance associated with it. I am therefore recommending that they should not be designated.

- 3.46 The policy adds no locally specific details to that set out in the strategic Policy LD4. It is therefore recommended that Policy HS4 should be deleted. In any case Policy HS5 e) provides safeguards should other sites be identified in the future as it refers to the retention and enhancement of any non-designated heritage assets that may be identified. A paragraph may be added to the text in the Plan under Policy HS5 to state that any development proposals affecting heritage assets will be considered against Core Strategy Policy LD4.

Recommendation 6: Delete Policy HS4 and delete the sites from Figure 10.

POLICY HS5 Landscape and Natural Environment

- 3.47 The policy sets out a number of considerations to safeguard and enhance the natural environment and to encourage suitable landscaping schemes in new development proposal. It provides additional local detail to strategic Policy LD1.
- 3.48 Criterion c) identifies four views that are to be protected and enhanced. Only three of these are shown on Figure 10 using broad arrows and a photograph is included of only one view. It is not clear where the viewpoints are. The QB has supplied me with a revised Figure 10 to include the location of the view towards Lyde Hill and stated that all the views identified are from publicly accessible vantage points.
- 3.49 During my site visit I visited the location of each viewpoint. Views (i) and (iv) shown as 3 and 4 on figure 10 give exceptional long distance views over the surrounding countryside. Viewpoint (i)/3 lies within the protected corridor for the relief road and may be affected by the road proposal. Viewpoint (iv) / 4 is on the northern edge of the plan area and the view covers land outside the plan area. The location therefore cannot be included in the plan. Views (ii) and (iii) numbered 5 and 7 on Figure 10 are from the footpath around the northern edge of Shelwick village. The views are attractive but not exceptional over the local rolling countryside that provides a setting for the village.
- 3.50 I therefore recommend that view (iv) / 4 should be deleted. The views should be shown on the Policies Map and should be numbered in the same format as in the Policy. Figure 10 should be deleted. To improve the clarity of the wording of the policy, it is recommended that criterion c) should be worded so as to “safeguard” the views rather than “to protect and enhance” them.
- 3.51 Criterion d) refers to three Local Wildlife Sites. These are not shown on the Policies Map. HC has confirmed that they are all located outside the parish and cannot therefore be covered by policies in the HSNP. They are in any case conserved through strategic policies. It is recommended that criterion d) should be deleted.

Recommendation 7: Revise Policy HS5 as follows:

Revise criterion c) to read “They safeguard the following views: (i), (ii) and (iii). Delete (iv).

Delete criterion (d).

Delete Figure 10. Show the three views on the Policies Map.

Revise paragraph 6.8 to delete “local wildlife sites and sites of nature conservation” and add “*The Lugg Meadows (SSSI and SWS), Hereford and Gloucester Canal (Local Wildlife Site) and the disused railway line (Site of Nature Conservation) lie close to but outside the southern border of the plan area.*”

Add a paragraph to state that “*any development proposals affecting heritage assets will be considered against Core Strategy Policy LD4*”.

POLICY HS6 To Support the Growth of Local Businesses

- 3.52 The policy encourages small-scale business enterprises suitable for a rural area through four types of development. Core Strategy Policy E1 provides the overall framework for encouraging the diversification of employment provision in the area. It sets out a number of factors that are to be considered in determining whether a proposal is suitable.
- 3.53 HC has commented that the term “small scale business enterprises” is considered to be restrictive and open to misinterpretation. They advise that the Core Strategy approach is for “proposals that are of an appropriate scale commensurate with their location and setting”. I recommend that this wording should be used to better reflect the strategic policy approach.

Recommendation 8: Revise Policy HS6 as follows:

Revise the first line to read: “Proposals for the development of *businesses that are of an appropriate scale commensurate with their location and setting will be encouraged where*”

POLICY HS7 Community Facilities

- 3.54 The policy seeks to protect and enhance three community facilities and supports the development of new facilities to serve the existing and new communities in the Plan area. The location of the community facilities is shown on Figure 11. It is recommended that the sites in the policy and the map should have the same reference numbers; they should also be shown on the Policies Map.
- 3.55 Paragraph 6.11 has identified the need to improve indoor and outdoor sports and play facilities, open space and allotments and for improved educational facilities. It accords with Core Strategy Policy HD4.

- 3.56 It is considered that the policy conforms with national guidance and strategic policies.

Recommendation 9: Revise Policy HS7 as follows:

Letter the community facilities in the policy in the same format as on Figure 11 and shown the sites on the Policies Map so that the boundaries of the sites can be identified.

POLICY HS8 Protecting Local Green Spaces

- 3.57 The policy proposes to designate 10 areas as Local Green Space. The sites are assessed in Table 1 of the Plan against the criteria in paragraph 100 of the NPPF.
- 3.58 Representations have been received against the designation of the following sites:
- Site 3: This is private land with no public access, is not available for recreational use, there are no features of historic or cultural interest or biodiversity interest.
 - Site 4: This is an agricultural field that is not publicly accessible with no distinctive local character, beauty, ecological value or historical significance. It is claimed that it is special because of the views across it of the church.
 - Site 9: The main part of the site is privately owned and constitutes the grounds of Holmer Court Residential Care Home and may be required for the expansion of the Care Home in the future. It is bounded by trees and hedgerows which could be retained if the site were developed. The site is not accessible to the public.
 - That sites 3, 6, 7 and 8 in combination would result in 10.56 ha of land which amounts to an extensive tract of land and its designation as Local Green Space would limit any further sustainable development opportunities on the edge of Holmer contrary to national planning guidance.
 - It is noted that part of sites 3, 6 and 7 are affected by the Relief Road Corridor although this would not be classified as inappropriate development under paragraph 146 of the NPPF. HC has questioned whether it is logical to designate this area as Local Green Space as it is likely that the sites value and accessibility will be significantly changed by the road route.
- 3.59 NPPF paragraph 100 is clear that the designation of land as Local Green Space should only be used where it is demonstrated that the site is demonstrably special to the local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its

wildlife. Furthermore, it should be local in character and is not an extensive tract of land.

3.60 During my site visit I considered each site.

- Sites 1 and 2 are children's play areas and open space within the housing developments and fulfil the criteria to be classed as Local Green Space.
- Sites 3, 4 and 8 are agricultural land and do not fulfil the criteria and should not be designated as Local Green Space. I appreciate the concerns of HC about the value of designating site 3 as it is largely within the route of the relief road corridor and will therefore be safeguarded from development.
- Site 5 is the duck pond which is accessible from the road and has a seat. It is considered that it fulfils the criteria to be classed as Local Green Space.
- Site 6, part of site 9 and site 10 form the landscaping areas around the western and northern part of The Furlongs housing development and includes the SuDS area. It is noted that site 10 has been included within site 9 on Figure 12. Plans of the development supplied to me show that the northern boundary of SuDS area differs from that on the map in Figure 12. There is a further landscape belt along the eastern side of the development which has not been proposed as a Local Green Space. I appreciate the concerns of HC about the value of designating site 6 as it is largely within the route of the relief road corridor and will therefore be safeguarded from development. Once the road has been developed the nature and accessibility of the site will undoubtedly be changed. It is recommended therefore that site 6 should not be designated. Site 10 should be separately identified on Figure 12 as the landscaped area along the western and north western boundary of the housing development.
- Site 7 consists of a landscaped buffer zone with footpath access and seating on the northern edge of the housing development that may be appropriate for designation as Local Green Space. I appreciate the concerns of HC about the value of designating this area as it is largely within the route of the relief road corridor and will therefore be safeguarded from any development. Once the road has been developed the nature and accessibility of the site will undoubtedly be changed. It is recommended therefore that site 7 should not be designated.
- Most of site 9 is the gardens to the Holmer Court Residential Care Home. This is private land and does not meet the criteria to be designated as a Local Green Space.

3.61 The assessment of the sites and figures 12 and 13 refer to a lost footpath. This is not a justification for designating any of the sites and reference to action to reopening it should be deleted from the Plan or included as a Community Action.

3.62 Policies in neighbourhood plans cannot state whether development will or will not be permitted. The NPPF states that "Planning law requires that applications for planning permission be determined in accordance with the

development plan, unless material considerations indicate otherwise”. Amendments are recommended to the wording of the final paragraph of Policy HS8 to ensure that it conforms to national policy.

Recommendation 10: Revise Policy HS8 by deleting sites 3, 4, 6, 7, 8 and 9.

Show the boundary of site 10. The remaining sites should be renumbered in the Policy and Figure 12 and the Policies Map should be revised.

Lost footpath 7 should be deleted from figure 12. Figure 13 should be deleted.

Revise the final paragraph of Policy HS8 to read: “*Inappropriate development that would be harmful to the Local Green Spaces will not be supported except in very special circumstances*”.

POLICY HS9 Hereford Western Relief Road

- 3.63 The policy sets out environmental, landscaping and design matters to be taken into account in the layout and design of the proposed Hereford Western Relief Road that will cross the Plan area. HC has not raised any concerns about the measures proposed in the policy.
- 3.64 The route of the relief road is a strategic matter. The policy provides local guidance on design and environmental matters. I consider that it accords with national and strategic guidance and policy.

POLICY HS10 Community Infrastructure Levy and Planning Obligations

- 3.65 The policy provides a framework for the use of Community infrastructure Levy and other funding such as S106 agreements by the Parish Council. A number of examples of the type of projects that may be supported are set out in paragraph 6.18. Paragraph 6.19 sets out several non planning measures that also fall under the heading of Community Aspirations.
- 3.66 It is considered that this is a community aspiration and not a planning policy. The section should be headed as “Community Aspiration” with supporting text to state that it does not form part of the Neighbourhood Development Plan. The policy wording should be deleted or incorporated into paragraphs 6.15 – 6.18.

Recommendation 11: Delete the heading of Policy HS10 and the policy wording. Replace with the heading of Community Aspirations. Include a note to state that the following text does not form part of the policies of the Neighbourhood Development Plan.

How to comment on the Draft Plan

3.67 This section should be deleted from the final version of the Plan.

4.0 Referendum

4.1 The Holmer and Shelwick Neighbourhood Plan reflects the views held by the community as demonstrated through the consultations and, subject to the modifications proposed, sets out a realistic and achievable vision to support the future improvement of the community.

4.2 I am satisfied that the Neighbourhood Plan meets all the statutory requirements, in particular those set out in paragraph 8(1) of schedule 4B of the Town and Country Planning Act 1990 and, subject to the modifications I have identified, meets the Basic Conditions namely:

- has regard to national policies and advice contained in guidance issued by the Secretary of State;
- contributes to the achievement of sustainable development;
- is in general conformity with the strategic policies contained in the Development Plan for the area;
- does not breach, and is otherwise compatible with, EU obligations and human rights requirements

4.3 **I am pleased to recommend to Herefordshire Council that the Holmer and Shelwick Neighbourhood Plan should, subject to the modifications I have put forward, proceed to referendum.**

4.4 I am required to consider whether the referendum area should be extended beyond the Neighbourhood Plan area. In all the matters I have considered I have not seen anything that suggests the referendum area should be extended beyond the boundaries of the plan area as they are currently defined. I recommend that the Neighbourhood Plan should proceed to a referendum based on the neighbourhood area designated by the Herefordshire Council on 22 February 2017.

5.0 Background Documents

5.1 In undertaking this examination, I have considered the following documents

- Holmer and Shelwick Neighbourhood Plan Submission Draft Version dated July 2019;
- Holmer and Shelwick Neighbourhood Plan Basic Conditions Statement;
- Holmer and Shelwick Neighbourhood Plan Habitats Regulations Assessment Report July 2019;
- Holmer and Shelwick Neighbourhood Plan SEA Assessment and Environmental Report July 2019
- Holmer and Shelwick Neighbourhood Plan Consultation Statement;
- National Planning Policy Framework February 2019;
- Planning Practice Guidance March 2014 (as amended);
- The Town and Country Planning Act 1990 (as amended);
- The Localism Act 2011;
- The Neighbourhood Planning (General) Regulations 2012;
- Herefordshire Core Strategy 2015;
- Parking Standards, Herefordshire Council January 2006.

6.0 Summary of Recommendations

Recommendation 1: Show the Plan period on the front cover of the HSNP with the start date from the date the plan is made.

Recommendation 2: Include a new policy as follows:

“The HSNP will provide for about 500 new homes in Holmer and 17 new homes in Munstone and Shelwick to meet the housing needs of the parish over the plan period 2011 – 2031.

New housing will be supported on sites that lie within the Settlement Boundaries of Holmer, Munstone and Shelwick in accordance with other relevant policies of the development plan.

New housing will be delivered through:

- ***Dwellings which have planning consent at July 2019;***
- ***Windfall opportunities in accordance with Policies HS1 and HS2 and Core Strategy Policies RA2 – RA5, H2 and the NPPF.”***

Recommendation 3: Revise Policy HS1 as follows:

Delete “or adjacent to” from the first paragraph.

Add the following after the first sentence: “*New housing development will be supported adjacent to and outside the settlement boundaries of Munstone and Shelwick where it delivers rural exceptions housing in accordance with Core Strategy Policy H2 and where it is evidenced through a local housing needs assessment.*”

Delete criteria a) and f).

Revise criterion i) to read: “*The proposed homes will not be adversely impacted by existing agricultural or commercial activity*”.

Check the wording and grammar of the criteria. Place “and” at the end of the penultimate criterion.

Add explanatory text at the end of paragraph 6.3 on the lines of “*Small scale housing development outside and adjacent to the settlement boundary will be supported where it delivers a mix of affordable and market housing to meet local needs in accordance with Core Strategy Policy H2.*”

Recommendation 4: Revise Policy HS2 as follows:

Revise the last sentence of the first paragraph to read: “*The proposed homes will not be adversely impacted by existing agricultural or commercial activity*”.

Place the first sentence of the second paragraph in the justification. "Development sitesA4103". Revise the last sentence of the policy to read: "The design and layout of sites must take into account.....".

Add the following to the justification: "*The housing commitments included in the settlement boundary should deliver about 510 homes, sufficient to deliver the Northern Urban Extension of Hereford. A site for the Park and Choose site has been agreed within the settlement boundary to the north of Holmer House Farm adjacent to the A49. Should additional sites be required to help achieve the strategic housing requirement for Hereford, these will be allocated in the Hereford Area Plan and the settlement boundary revised accordingly.*"

Revise the settlement boundary on the Policies Map for Holmer to include the site at Holmer House Farm that has received planning permission for up to 100 homes.

Recommendation 5: Revise Policy HS3 as follows:

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Revise criterion d) to read "Scale and height of buildings should vary across the site *up to a maximum of three storeys*, with landmark buildings occupying key positions, such as corners, on the site."

Recommendation 6: Delete Policy HS4 and delete the sites from Figure 10.

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Revise paragraph 6.8 to delete "local wildlife sites and sites of nature conservation" and add "*The Lugg Meadows (SSSI and SWS), Hereford and Gloucester Canal (Local Wildlife Site) and the disused railway line (Site of Nature Conservation) lie close to but outside the southern border of the plan area.*"

Add a paragraph to state that "*any development proposals affecting heritage assets will be considered against Core Strategy Policy LD4*".

Recommendation 8: Revise Policy HS6 as follows:

Revise the first line to read: "Proposals for the development of *businesses that are of an appropriate scale commensurate with their location and setting* will be encouraged where"

Recommendation 9: Revise Policy HS7 as follows:

Letter the community facilities in the policy in the same format as on Figure 11 and shown the sites on the Policies Map so that the boundaries of the sites can be identified.

Recommendation 10: Revise Policy HS8 by deleting sites 3, 4, 6, 7, 8 and 9.

Show the boundary of site 10. The remaining sites should be renumbered in the Policy and Figure 12 and the Policies Map should be revised.

Lost footpath 7 should be deleted from figure 12. Figure 13 should be deleted.

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Recommendation 11: Delete the heading of Policy HS10 and the policy wording. Replace with the heading of Community Aspirations. Include a note to state that the following text does not form part of the policies of the Neighbourhood Development Plan.