Madley Neighbourhood Development Plan 2011-2031

Response to Regulation 16 representations

Introduction

- The Madley Neighbourhood Development Plan (NDP) was submitted by Madley Parish Council
 to Herefordshire Council on 11 December 2019. A consultation in accordance with Regulation
 16 was carried out by Herefordshire Council from 18 December 2019 to 12 February 2020.
- 2. The NDP progressed to examination on 25 February 2020. Madley Parish Council has been given an opportunity to respond to the representations made at the Regulation 16 stage. The Parish Council wishes to respond to the representations made by Gladman Developments Ltd. This response is set out in the schedule overleaf. The opportunity to respond is appreciated.
- 3. Madley Parish Council has no comment to make on the other representations.

NPPF = National Planning Policy Framework (February 2019)

LPCS = Herefordshire Local Plan Core Strategy 2011-2031 (October 2015)

NDP = Madley Neighbourhood Development Plan 2011-2031, Consultation draft (May 2019)

Summary of	Madley Parish Council response
representation	
Policy MH1: Housing	Settlement boundaries are a tried and tested planning tool to
delivery:	manage village development and protect the surrounding
Object to the use of	countryside. They provide clarity as to where different planning
settlement limits where	policies apply, so that decision makers can apply them consistently
they would preclude	and with confidence when determining planning applications,
otherwise sustainable	whilst also being able to respond to local characteristics and the
development from	immediate planning context.
coming forward. The	
use of settlement limits	In Herefordshire the use of settlement boundaries is promoted by
to arbitrarily restrict	the LPCS (para. 4.8.23). NDPs are the established planning
suitable development	mechanism for their definition. The principle of using settlement
on the edge of	boundaries has been supported at Examination, including recently
settlements does not	at Pembridge (December 2018), Aymestrey (March 2019) and
accord with the positive	Withington (July 2019), despite similar representations to those
approach to growth	made here being raised by Gladman Developments Ltd.
required by the NPPF.	
Policy should be worded	The Madley NDP has implemented the strategic approach set out
more flexibly in interim	in the LPCS. This provides clarity as to whether land is in the
to the progression of	village, and so subject to policy MH3 with its positive support for
the LPCS Review.	infill development, or the countryside (and so subject to LPCS
	policy RA3). By being able to demonstrate the delivery of more
Policy MH3: Madley	housing than the minimum required it is taking a positive approach
settlement boundary:	to growth. HC have confirmed in their Regulation 14 consultation
NDP policies will be	response that it is clear the plan takes a positive approach towards
superseded by the LPCS	identifying settlement boundaries and allocation of housing in line
Review if they are not	with the LPCS.
drafted to allow for	
sufficient flexibility	The representation suggests a more flexible approach so as to be
towards changing needs	able to respond to speculative future needs. This would be
(as suggested in	contrary to the LPCS, as explained above. Moreover, LPCS policy
response to policy	SS3 sets out a strategic approach to ensuring sufficient housing
MH1).	land delivery, including provision for a Review (now commenced).
	In this context there is no call to develop local approaches in NDPs
	to provide flexibility. This would represent an unjustified

Summary of representation	Madley Parish Council response
	weakening of planning control which, by potentially allowing further building in relatively remote and poorly-serviced rural locations, would risk being contrary to sustainable development. In short, the NDP's approach to housing delivery is soundly-based, implementing a key requirement of the LPCS by defining an
	appropriate settlement boundary. This enables proportionate housing delivery to meet strategic needs and enable local development, whilst protecting village character and the surrounding open countryside.
Policy MSC3: Local Green Spaces The Glebe Field is 2.1 ha and does not meet the requirements for an area proposed for LGS designation not to be an extensive tract of land. It should be removed from the policy.	There is no definition of what makes an area "extensive" in the context of designating land as Local Green Space (LGS). Planning Practice Guidance indicates that there are no hard and fast rules about how big LGS can be because places are different and a degree of judgment will inevitably be needed, although blanket designation of open countryside adjacent to settlements will not be appropriate.
	Whilst the examples cited in the representation appear to show that Examiners have sometimes recommended deletion of LGS on the basis of size, this will have been a matter of judgement based on the context. It is also the case that larger areas have been designated as LGS. In Herefordshire, the made Fownhope NDP includes LGS of 4.1 ha.; elsewhere, the made Goodworth Clatford NDP includes one of 6.0 ha. In any event, the Glebe Field at Madley is smaller than all the examples given in the representation.
	Turning then to the local context, there is no suggestion that the Glebe Field amounts to the blanket designation of open countryside. Nor does it represent an extensive tract of land. It is a discrete parcel of land with well-defined hedgerow boundaries. A glance at the Madley village policies map shows that it is of similar size and shape to other land parcels east of Madley, and much smaller than other fields surrounding the village to north, west and south. It is evident that in the local context the Glebe Field does not represent an extensive tract of land.

Dr DJ Nicholson MRTPI · DJN Planning Limited March 2020 For Madley Parish Council