

# Herefordshire Local Plan Rural Areas Sites Allocations Development Plan Document

Issues and Options Paper

Consultation Statement

November 2017



## **Rural Areas Site Allocation (RASA) DPD Issues and Options – Consultation Statement**

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## 1. Introduction

1.1 The purpose of this document is to explain how the council has complied with its Statement of Community Involvement and Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 in the arrangement of this consultation.

1.2 This statement sets out the methods Herefordshire Council has used to engage with both stakeholders and the community in the preparation of the RASA DPD Issues and Options between 12 June and 28 July 2017, including the following:

- Which bodies and persons were invited to make representations
- How those bodies and persons were invited to make representations
- How information was made available to be viewed
- A summary of the key issues raised through representations
- How those issues have been addressed in the Development Plan Document

1.3 The document preparation process includes undertaking appropriate consultation and engagement at key stages.

1.4 The following table shows the different stages of preparation for the RASA DPD.

<b>Stage</b>	
Issues and Options Public Consultation	Completed
Preferred Options and site allocation options Public Consultation	Next stage March 2018
Draft Plan	
Submission of final draft to Secretary of State	
Examination in Public	
Inspectors Report	
Council Approval for Adoption	

## **2. Preparation of the RASA DPD Issues and Options Document**

- 2.1 The Herefordshire Local Plan – Core Strategy was adopted in October 2015 and sets out the overall vision, objectives and spatial strategy for the county.
- 2.2 119 rural settlements have been identified within policy RA2 (fig 4.14 and 4.15) as the main focus for proportional growth with rural area. Residential development is directed to ‘within or adjacent to the built up areas’ of these settlements. However, no settlement boundaries or mapping is provided within the Core Strategy to define these settlements or indicate where future development should be located.
- 2.3 The Core Strategy highlights that settlement boundaries will be defined within neighbourhood development plans or the RASA DPD.
- 2.4 A proactive approach has been taken to neighbourhood planning within the county and these plans form the principle documents to support the Core Strategy within the market towns and the rural areas. As at September 2017, 108 neighbourhood areas have been designated with 29 neighbourhood plan currently adopted and a further 34 reaching at least draft plan stage.
- 2.5 However, the production of a neighbourhood development plan has always been optional and not compulsory for parish councils and communities. There has always been an understanding that a development plan document would be produced to cover those who are not producing a neighbourhood development plan so there would be no pressure to produce a plan if the parish felt it was not appropriate for them.
- 2.6 This Rural Area Site Allocation DPD (RASA DPD) will therefore contain the more detailed proposals to ensure the full delivery of the rural growth with the Core Strategy in areas which are not producing a neighbourhood development plan.
- 2.7 The Issues and Options consultation was the first stage of this DPD. It outlined the possible options for both the scope of the document and the topic areas to be included. A total of 8 options were presented outlining the range of parishes / settlements which could be included within the DPD. The paper also outlined the potential policy areas which could be considered for inclusion.
- 2.8 The aim of the RASA DPD is not to undermine or replace any neighbourhood development plan in production but provide policies for those areas highlighted within the Core Strategy but not covered by a plan to ensure full detailed plan coverage.

### **3. Consultation Methodology**

- 3.1 The council has an extensive consultation database, containing over 3,000 contact names. The list includes individual residents, developers, businesses based across the county, parish councils, community and voluntary groups, infrastructure providers, neighbouring authorities, government agencies and elected members.
- 3.2 The council used a range of methods to engage with all potentially interested parties, in order to ensure that all have the opportunity to make a representation.
- 3.3 The purpose of the consultation was to invite feedback on a number of aspects featured in the issues and options document, including settlement boundaries and range and mix of allocated housing.
- 3.4 Stakeholders and local community members were informed by email, in writing or face-to-face about ways to get involved in the consultation. A variety of methods to respond were given, both on and offline in order to reach the broadest audience possible.

### **4. The Consultation**

- 4.1 The Council published the draft RASA DPD Issues and Options document for public consultation from 12 June to 28 July 2017.
- 4.2 Notification of the consultation was sent to Herefordshire Parish Councils, specified consultees, all those who had registered an interest in Herefordshire planning, stakeholders and neighbouring authorities, notifying them of the details and inviting them to take part in the consultation.
- 4.3 A comprehensive list of specified consultees can be found in Appendix 1 of this document.
- 4.4 The correspondence sent included details of where to find further information and how to make a representation either online or in writing.
- 4.5 The following documentation was made available to download on the dedicated webpage [www.herefordshire.gov.uk/rasadpd](http://www.herefordshire.gov.uk/rasadpd) and in hard copy at libraries and information centres across the county.
  - Draft Development Plan Document
  - Questionnaire

4.6 The following table details each method used to distribute information:

<b>Method</b>	
Email Specified statutory consultees, local business owners, groups representing, parish reps & neighbouring authorities	Notification of consultation Sent  Reminder sent part way through consultation
Letter As above with no email address known, inc MPs	Notification of consultation Sent
Facebook	Notification of consultation start posted on council page with direct link to website followed by regular updates throughout
Twitter	Notification of consultation start on council page with direct link to website followed by regular updates throughout
Council Website	Featured on council news page throughout consultation with direct link to consultation page
Ward members' Newsletter	Information sent for inclusion in weekly newsletter
Hard copies made available at info points / libraries across the county	Followed up to ensure information was on display and address any queries from staff
Presentation to parish councillors	Presentation to parish councillors to outline the forthcoming consultation and the options available to parishes.  Shirehall, Hereford 22 May
Exhibition at Bartestree (14 June), Bromyard (5 July) and Much Dewchurch (11 July)	Exhibition and options material available together with staff members to answer any queries.

4.7 35 parish representatives attended Shirehall for the presentation on 22 May.

4.8 The Bromyard exhibition received 32 attendees and 23 parish members visited each of the other two venues.

## 5. Responses to the Consultation

5.1 The consultation web page received 368 views.

5.2 A total of 100 responses were received either via the online survey, by email or by post.

5.3 Among the responses were the following groups and organisations:

<b>Name of organisation</b>
Historic England
Carter Jonas LLP
Duchy of Cornwall
CPRE Herefordshire
Beck UK
Herefordshire Local Nature Partnership
Brockhampton Group Parish Council
Network Rail
South Worcestershire Development Plan
RCA Regeneration Ltd
Gladman Developments Ltd
Malvern Hills AONB
Welsh Water
Shropshire Council
SLR Consulting
Litchfields on behalf of Church Commissioners of England
Litchfields on behalf of Bourne Leisure
Environment Agency
Sport England
The Canal and River Trust
Forest of Dean District Council
Monkland & Stretford Parish Council
Moreton on Lugg Parish Council
Cradley Parish Council
Wellington Parish Council
The Coal Authority
Clehonger Parish Council
Orcop Parish Council
Garway Parish Council
Gloucestershire County Council
Powells Chartered Surveyors on behalf of HR9 7SW
Logaston Press Kington Walking Festival Hereford Community Land Trust

## **6. Conclusions from the consultation responses**

- 6.1 As a result of analysis of responses, there are a number of key issues to consider in preparation for the next stage.
- 6.2 The consultation feedback indicate that a RASA is appropriate for those areas which do not have a neighbourhood development plans including those who are not demonstrating particular progress or little activity. With regards to Bromyard Town, a separate Bromyard Development Plan Document was highlighted as appropriate with the surrounding parishes being included within the RASA DPD. These issues will be reviewed as part of the next stage.
- 6.3 With regards to content, the feedback indicated that defining settlement boundaries, where appropriate, were favourable with an alternative approach in areas with a dispersed settlement pattern. A range of site sizes should be allocated however specific allocations for affordable or starter homes was not considered favourable.
- 6.4 The feedback also indicated that employment land and local green space should also be allocated within the plan.
- 6.5 For a complete summary breakdown by question, please refer to appendix 4.

## **7. What Happens Next?**

- 7.1 The preferred options and site allocation options stage of the RASA consultation will:
- Explain how the issues and options stage of consultation feedback has informed development of the document.
  - Present the preferred options and potential settlement boundaries and site allocation options
  - Seek feedback about the preferred options

## **8. Appendices**

### **Appendix 1 – Consultees**

The Town and Country Planning (Local Planning) (England) Regulations 2012 sets out those bodies that the Council must consult with when preparing plan documents and planning applications.

Organisations and Groups targeted include:

- Central, regional and local Government organisations
- Adjoining local authorities
- Statutory bodies such as Highways England and utility companies
- Community, voluntary, resident and interested groups
- Members of the public
- Parish/Town Councils
- Local businesses
- Developers and agents.

## Appendix 2 – Letter



### Economy, Communities and Corporate Directorate

Geoff Hughes (Director)

«Title» «First\_name» «Last\_name»  
«Organisation»  
«Address1»  
«Address2»  
«Address3»  
«Address4»  
«Post\_Code»

Our Ref:

Please ask for: Susi Gilson

Direct line / Extension: 01432 383357

E-mail: Susannah.gilson@herefordshire.gov.uk

Date as postmark

«GreetingLine»

### **Rural Areas Site Allocations Development Plan Document – Issues and Options Consultation**

#### **Town and Country Planning (Local Planning) (England) Regulation 2012 – Regulation 18**

The Herefordshire Core Strategy was adopted in October 2015 and sets out the overall vision, objectives and spatial strategy for the county. The Rural Area Site Allocations DPD (RASA DPD) is seeking to provide a more detailed policy framework and growth proposals to support the delivery of the Herefordshire Core Strategy for those market towns or rural parishes who are not preparing a neighbourhood development plan.

The Issues and Options Paper of the RASA DPD presents a number of potential options for the scope of the document; including which parishes should be included within the plan. It should be noted that these options are dependent on the current progress of the neighbourhood development plan within the parish at April 2017. It also presents options regarding the range of policy topics which could be included, such as settlement boundaries, housing and employment allocations and primary shopping areas.

This plan will become a statutory element of the county's local plan and used to determine planning applications.

#### **Consultation dates and exhibitions**

The Issues and Options paper is being consulted upon from **Monday 12 June to Friday 28 July 2017**.

Responses received during this period along with further evidence gathered will help formulate the next stage of the preparation of the RASA DPD. Following this stage, further consultations will be undertaken with regards to site allocations and policy wording.

The Issues and options paper can be viewed online at [www.herefordshire.gov.uk/rasadpd](http://www.herefordshire.gov.uk/rasadpd) or within the county's libraries and info centres

The consultation exhibition will be at the following venues, where officers will be available to answer any queries;

- Bartestree village hall on Wednesday 14 June (1:30 – 6pm) ;
- Hope Centre, Bromyard on Wednesday 5 July (1:30 -6pm) and
- Much Dewchurch village hall on Tuesday 11 July (1:30 -6pm)
- 

We would like to hear your views about the issues and options detailed in the document, please complete either the online or paper questionnaire. Comments should be returned by **Friday 28 July 2017**.

If you have any questions about the RASA DPD consultation please call us on 01432 383357 or email us on [neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk)

Your details are contained within our Consultation database. If you would prefer not to be contacted about future consultations, please let us know.

Kind regards

*Sam*

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Neighbourhood Planning Team  
Herefordshire Council  
Plough Lane  
Hereford  
HR4 0LE

Tel: 01432 261576

email: [sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)  
[www.herefordshire.gov.uk/neighbourhoodplanning](http://www.herefordshire.gov.uk/neighbourhoodplanning)

## Appendix 3 – Response Questionnaire



### **Rural Areas Site Allocation Development Plan Document (RASA DPD) Questionnaire**

The RASA DPD is seeking to provide a policy framework and growth proposals to support the delivery of the Herefordshire Core Strategy for those market towns or parishes which are not included within a neighbourhood development plan.

The Issues and Options Paper of the RASA DPD presents a number of potential options for the scope of the document; which parishes should be included within the plan. It should be noted that these options are dependent on the current progress of the neighbourhood development plan within the parish at April 2017. It also presents options regarding the range of policy topics which could be included, such as settlement boundaries, housing and employment allocations and primary shopping areas.

**The document can be viewed at [www.herefordshire.gov.uk/rasadpd](http://www.herefordshire.gov.uk/rasadpd)**

The consultation exhibition will be available at the following venues:

- Bartestree village hall on Wednesday 14 June;
- Hope Centre, Bromyard on Wednesday 5 July and
- Much Dewchurch village hall on Tuesday 11 July

We would like to hear your views about the issues and options detailed in the document.

Please complete the following questionnaire, which is also available online if you would prefer at [www.herefordshire.gov.uk/rasadpd](http://www.herefordshire.gov.uk/rasadpd)

**This consultation runs from Monday 12 June to Friday 28 July 2017.**

Postcode\*: .....

\*This is only required to check the origin of responses

The questions refer to sections within the RASA DPD document, please refer to these sections prior to completing the questionnaire.

**Section 3 questions:**

**1. Is the approach toward the scope of the DPD appropriate given the positive support for neighbourhood planning within the county?**

Yes

No

**2. Are there any other issues which the RASA DPD could look to address?**

If yes, please explain:

**Section 4 questions:**

**3. Should Neighbourhood Development Plans be the sole mechanism for more local planning policy in the rural area or should a Rural Areas Site Allocation DPD be produced for those areas not covered by a NDP?**

- Only Neighbourhood Development Plans

- Neighbourhood Development Plans and Rural Site Allocation DPD

**4. Which of the options 1 to 6 is the most appropriate for the rural areas whilst maintaining support for neighbourhood plans?**

- Option 1

- Option 2

- Option 3

- Option 4

- Option 5

- Option 6

**5. Which is the most appropriate option for Bromyard town?**

- Option 1

- Option3

- Option 7

- Option 8

**6. Which is the most appropriate for the settlements within the Bromyard HMA?**

- Option 1
- Option 3
- Option 8

**7. Are there any alternative options not outlined above which should be considered?**

Yes

No

If yes, please explain:

**8. Should any of the parishes be removed from any of the options outlined because they are actively progressing a neighbourhood development plan?**

Yes

No

If yes, which ones?

**Section 5 questions:**

**9. In line with the Core Strategy, is the defining of settlement boundaries within the RASA DPD appropriate?**

Yes

No  (if No please see question 11)

**10. Are there any additional criteria which should be used to define settlement boundaries, where appropriate?**

Yes

No

If yes, please explain:

**11. Is there an alternative to settlement boundaries which would define the settlement within the RA2 list for the purposes of development management?**

Yes

No

If yes, please explain:

**12. Should the RASA DPD contain a range of site sizes for housing allocations?**

Yes

No

**13. Should only small sites be allocated to contribute to the government objective of providing housing under half a hectare? (around 10 to 15 dwellings)**

Yes

No

**14. Should larger sites be allocated to contribute to providing a range and mix of housing including affordable housing?**

Yes

No

**15. Should the RASA DPD include allocated sites specifically for affordable housing and/or starter homes?**

Yes

No

**16. Should the RASA DPD include allocated sites specifically for employment growth?**

Yes

No

**17. Are there elements of the Economic Vision which could be included in land use terms within the RASA DPD?**

Yes

No

If yes, please explain:

**18. Should the RASA DPD designate Local Green Space where appropriate?**

Yes

No

**19. If so, are there any settlements where Local Green Space could be designated?**

**20. Are there any other policy areas which should be included within the RASA DPD?**

Yes

No

If yes, please explain:

**21. Are there any additional comments you have upon the content of the document?**

If yes, please explain:

If you would like to be kept informed about the progress of the RASA DPD and other projects in the county that may be of interest, please provide your details below:

Name:.....

Organisation:.....

Address:.....

.....

Email:.....

**About you (optional)**

All personal data will be treated in line with our obligations under the *Data Protection Act, 1998*. This means your personal data will not be shared.

The information collected will help us identify the types of community members that we have and haven't heard from, so we can seek feedback that is broadly representative of the Herefordshire community.

**Are you a member of a local business or organisation? (Please tick one box)**

- |                        |    |                          |
|------------------------|----|--------------------------|
| a) Yes, please specify | a) | <input type="checkbox"/> |
| b) No                  | b) | <input type="checkbox"/> |
| c) Prefer not to say   | c) | <input type="checkbox"/> |

**Which age group do you belong? (Please tick one box)**

a) 0-15	a)	
b) 16-24	b)	
c) 25-34	c)	
d) 35-44	d)	
e) 45-54	e)	
f) 55-64	f)	
g) 65-74	g)	
h) 75-84	h)	
i) 85+	i)	
j) Prefer not to say	j)	

**What is your gender? (Please tick one box)**

a) Male	a)	
b) Female	b)	
c) Other	c)	
d) Prefer not to say	d)	

**Do you consider yourself to have a disability?**

a) Yes	a)	
b) No	b)	
c) Prefer not to say	c)	

**Access to Information**

Herefordshire Council will use the questionnaires to shape the Rural Areas Site Allocation DPD. The data collected will not be used for any other purpose and the questionnaire will be disposed of securely after they have served this purpose.

Herefordshire Council is subject to the Freedom of Information Act 2000 and Environmental Information Regulations which means that questionnaire may be released in response to a request for information. However, all personal data will be treated in line with our obligations under the Data Protection Act, 1988. This means your personal data will not be shared.

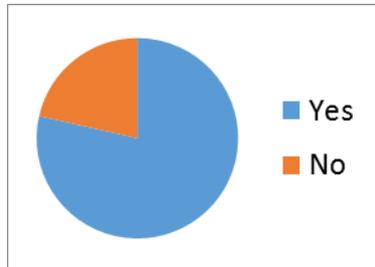
Alternative formats of this questionnaire are available on request by emailing [neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk) or phone 01432 260386

Please return this questionnaire by Friday 28 July 2017.

**Thank you for taking the time to complete this questionnaire.**

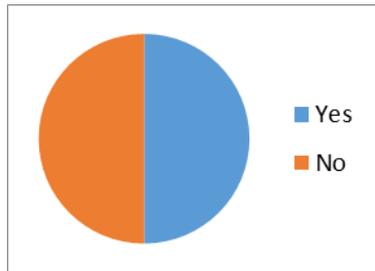
## Appendix 4 – Response Analysis

**Is the approach toward the scope of the DPD appropriate given the positive support for neighbourhood planning within the county?**



<b>Yes</b>	<b>78.57%</b>
<b>No</b>	<b>21.43%</b>
<b>Points raised include:</b>	<b>No. of occurrences</b>
DPD provides assurances to those parishes that haven't partaken in NDP process.	1

**Are there any other issues which the RASA DPD could look to address?**

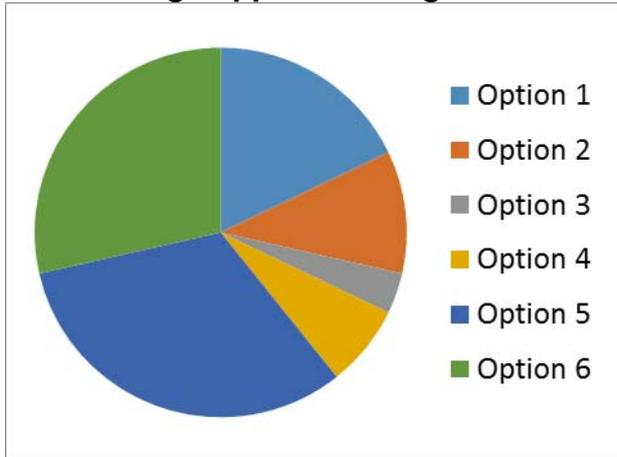


<b>Yes</b>	<b>50%</b>
<b>No</b>	<b>50%</b>
<b>Points raised include:</b>	<b>No. of occurrences</b>
Targeted growth of market centres vs the criteria when considering appropriate growth for smaller rural areas. Allowance of smaller development in rural areas. Support for community-led building when allowing development. Priorities to consider before development is allowed.	5
Adequacy and condition of road network. Improvement of infrastructure including transport, gas connection, sewage and drainage to support housing growth.	5
Provision for a combination of residential, leisure & tourism and employment development. Consideration of options for different types of development, particularly within agricultural areas. Allocation of land for good quality, family housing.	3
Lack of opportunity to explore topics raised in DPD. Consequences of those parishes who ultimately don't reach adoption of NDP. Level of control over large development provided by Core Strategy/relevant NDPs	3
Consideration of urban extension opportunities	1
Clearer time framework beyond 5 year housing supply	1

**Additional comments:**

**Brockhampton Group Parish Council**  
Transport, access to utilities, ecology

**Which of the options 1 to 6 is the most appropriate for the rural areas whilst maintaining support for neighbourhood plans?**



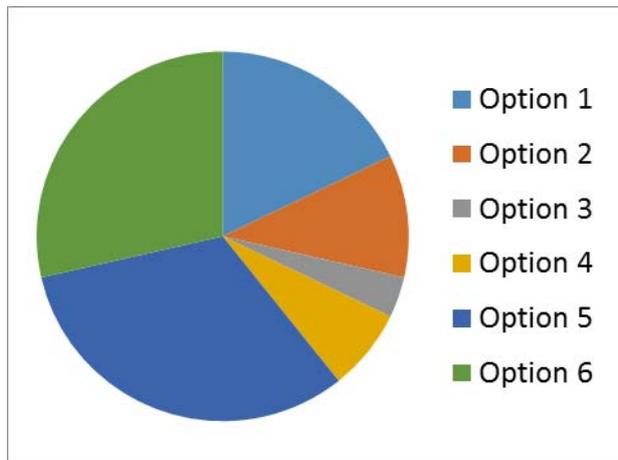
<b>Option 1</b>	<b>17.86%</b>
<b>Option 2</b>	<b>10.71%</b>
<b>Option 3</b>	<b>3.57%</b>
<b>Option 4</b>	<b>7.14%</b>
<b>Option 5</b>	<b>32.14%</b>
<b>Option 6</b>	<b>28.57%</b>
<b>Points raised include:</b>	<b>No. of occurrences</b>
Whether local planning policy uses the mechanism of NDP or RASA DPD, it is important to retain a level of local control. Fulfilment of housing numbers should be covered by a combination of NDP and RASA DPD use. It should be ensured that site allocations are reviewed annually or bi-annually to make sure that the housing land supply meets the HELAA.	3
Option 6 is too encompassing and will demotivate NDP teams as well as putting undue pressure on consultant resources who are helping produce NDP's	1

**Additional comments:**

**Brockhampton Group Parish Council**  
Neighbourhood Development Plans and Rural Site Allocation DPD

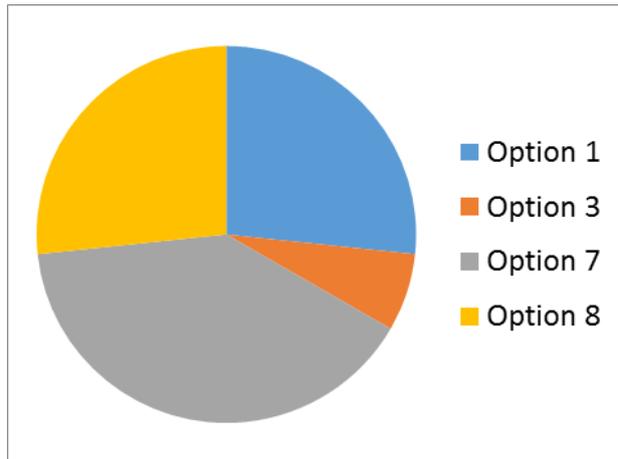
**Sutton St Nicholas Parish Council**  
Neighbourhood Development Plans and Rural Site Allocation DPD

**Which of the options 1 to 6 is the most appropriate for the rural areas whilst maintaining support for neighbourhood plans?**



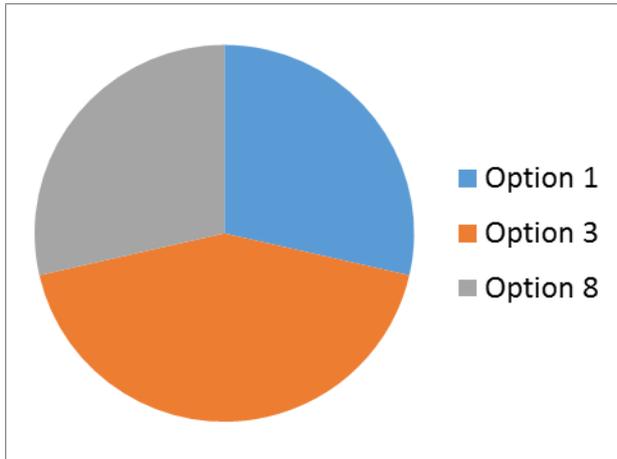
<b>Option 1</b>	<b>17.86%</b>
<b>Option 2</b>	<b>10.71%</b>
<b>Option 3</b>	<b>3.57%</b>
<b>Option 4</b>	<b>7.14%</b>
<b>Option 5</b>	<b>32.14%</b>
<b>Option 6</b>	<b>28.57%</b>
<b>Points raised include:</b>	<b>No. of occurrences</b>
Option 6 but excluding Bromyard and Winslow. The particular Bromyard issues – employment land etc. need separate treatment. 4.8.1 of the Core Strategy talks about the rural areas outside of Hereford and the market towns.	1
Important to have a review mechanism in place where NDPs may fail prior to completion in order to better ensure delivery of adequate housing supply.	1

**Which is the most appropriate option for Bromyard town?**



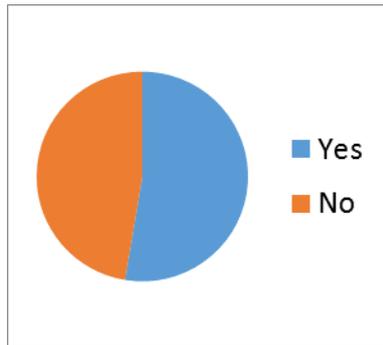
<b>Option 1</b>	<b>26.67%</b>
<b>Option 3</b>	<b>6.67%</b>
<b>Option 7</b>	<b>40%</b>
<b>Option 8</b>	<b>26.67%</b>
<b>Points raised include:</b>	<b>No. of occurrences</b>
Important that the Core Strategy's intention of strategic urban extension and 5ha employment zone being within the Bromyard boundary should be maintained. Also the issues of the 5ha of employment land, town centre, primary and secondary frontages and any additional criteria based development management style policies need to be addressed.	1
Possible solution is to seek an exemption for Bromyard so that it can continue to produce a Neighbourhood Plan that is supported by the residents rather than having a DPD imposed by HC.	1

**Which is the most appropriate for the settlements within the Bromyard HMA?**



<b>Option 1</b>	<b>28.57%</b>
<b>Option 3</b>	<b>42.86%</b>
<b>Option 8</b>	<b>28.57%</b>

**Are there any alternative options not outlined which should be considered?**

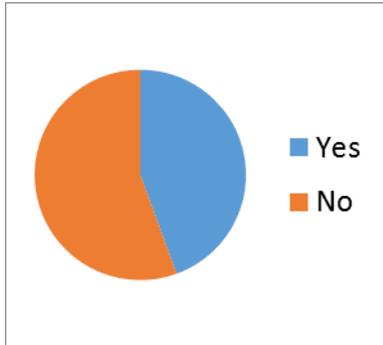


<b>Yes</b>	<b>52.63%</b>
<b>No</b>	<b>47.37%</b>
<b>Points raised include:</b>	<b>No. of occurrences</b>
Council should encourage all parish councils to produce NDPs. Settlement boundary should be decided at parish level, not county level. Need for settlement boundary to be agreed at parish level whether a NDP has or has not been produced.	3
Not sure	2
Should apply option 5 criteria	2
Rural site allocations should be prepared where sustainable development is proposed and there is no made or advanced NDP.	1
Consideration of best policy for delivery of tourism projects should be given.	1
Type of housing required should be appropriate to different areas including consideration of surrounding transport network.	1
Definitely not option 8	1

**Additional comments:**

**Brockhampton Group Parish Council**  
Neighbourhood Development Plans and Rural Site Allocation DPD

**Should any of the parishes be removed from any of the options outlined because they are actively progressing a neighbourhood development plan?**



<b>Yes</b>	<b>44.44%</b>
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<b>No</b>	<b>55.56%</b>
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<b>Points raised include:</b>	<b>No. of occurrences</b>
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Certain parishes pushing forward with NDP although still early stages but opportunity should be given to progress. Additional support from HC should be given to ensure parishes benefit from having NDP. Level of progress should be carefully considered in order to avoid parishes ultimately without NDP relying on guidance of Core Strategy only. Value to parish council input at strategic level.	11
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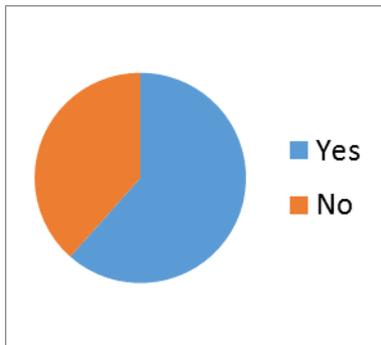
A mechanism for over development needs to be in place either way.	1
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**Additional comments**

**Clehonger Parish Council** have asked me to confirm to you that the Neighbourhood Plan for Clehonger is progressing with the questionnaire having been distributed and collected, the grant funding applied for and the NDP consultant appointed (Kirkwells). The next step is for the analysis of the feedback in the questionnaires to take place and a consultant analyst has been sourced for this also. Please can I therefore ask you to defer any proposal to undertake a DPD on behalf of Clehonger Parish at this time.

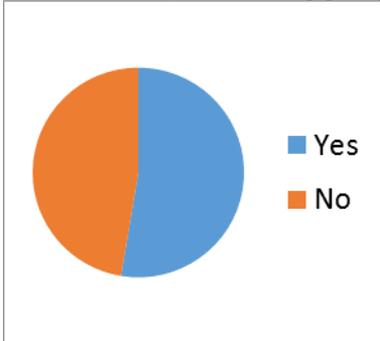
**Orcop parish Council**, although they have made little progress to date they are continuing to do an NDP and although are at an early stage they will be progressing this in the next 2 months to draft NDP stage with the support of Kirkwells.

**In line with the Core Strategy, is the defining of settlement boundaries within the RASA DPD appropriate?**



<b>Yes</b>	<b>61.54%</b>
<b>No</b>	<b>38.46%</b>
<b>Points raised include:</b>	<b>No. of occurrences</b>
Alternatives to conventional settlement boundaries should be used in areas with a dispersed settlement pattern. Needs to be flexibility on settlement boundaries in order to maximise on inclusion of windfall developments and deliver required levels of housing.	3
Boundaries should be subject to a robust consultation process as part of the preparation of the emerging DPD.	1

**Are there any additional criteria which should be used to define settlement boundaries, where appropriate?**



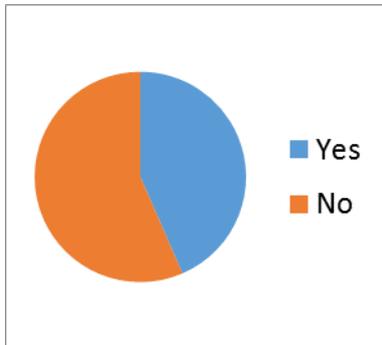
<b>Yes</b>	<b>52.63%</b>
<b>No</b>	<b>47.37%</b>

<b>Points raised include:</b>	<b>No. of occurrences</b>
Consideration of historic environment should be taken when defining settlement boundaries and the development that occurs within them, as well as possible identification of further conservation areas. Approach to definition of settlement boundaries and allocation of land for various uses needs to be consistent, using robust environmental evidence and taking into account proximity and layout of surrounding settlements. Allocation of land for development should be sensitive to position of existing housing, infrastructure and other amenities, especially where those are lacking.	11
Opportunities for sustainable development and associated growth of infrastructure should be considered when defining settlement boundaries.	1
Possibility of over development should be safeguarded.	1
The Boundary should not apply where the LPA cannot prove a five year housing land supply.	1

**Additional comments**

**Historic England**  
Page 32 discusses the role of settlement boundaries and Historic England would wish to comment on future proposed settlement boundaries. As there is a presumption in favour of development within settlement boundaries, could there be any potential effects for the historic environment? It may be appropriate to consider the historic environment in the process of defining settlement boundaries and how the historic character informs the boundary or will be affected by boundary amendments. Additionally whether there are any opportunities for further Conservation Areas to be identified.

**Is there an alternative to settlement boundaries which could define the settlement within the RA2 list for the purposes of development management?**



<b>Yes</b>	<b>43.48%</b>
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<b>No</b>	<b>56.52%</b>
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<b>Points raised include:</b>	<b>No. of occurrences</b>
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Where settlement boundary is difficult to define due to scattered nature of a parish, alternative guidance is required for development. Consideration should be given to impact on surrounding environment when allocating land for housing or other uses, this should also include whether type and size of housing is appropriate, where existing built-up areas and services are as well as adequacy of infrastructure. A common sense approach required for sustainability of locations.	7
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Apply policy to guide housing numbers and maximum per development with consideration to individual settlements. Avoid overcrowding single areas with development by spreading the numbers.	2
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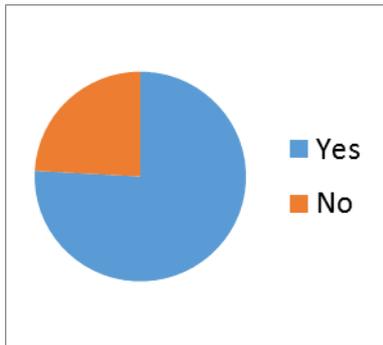
Expansion should be limited to Hereford until adequate services are in place to consider other areas.	1
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**Additional comments**

**CPRE**  
 The lists of proposed settlements which the RASA DPD will cover include some very dispersed places where it would be very hard to draw a meaningful settlement boundary. In these settlements there should be the option of criteria based policies which could be applied to potential development sites. Landscape impact should be one of these criteria

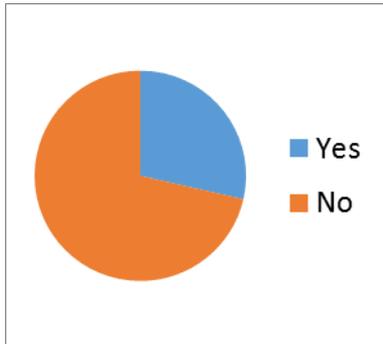
**Brockhampton Group Parish Council**  
 Locations where there are groups of existing properties with opportunity to increase settlement by proportionate amount. For example Malvern Road (Linton). Saltmarshe should also be considered in housing allocations summary.

**Should the RASA DPD contain a range of sites for housing allocations?**



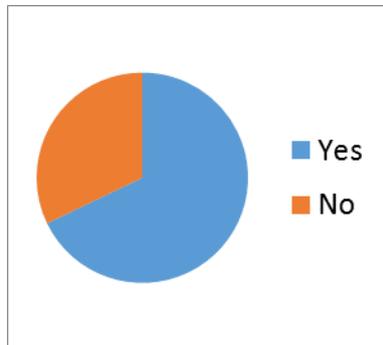
<b>Yes</b>	<b>75.86%</b>
<b>No</b>	<b>24.14%</b>
<b>Points raised include:</b>	<b>No. of occurrences</b>
There may be valuable information gathered from parish consultation during work on NDPs which could be used to inform decisions on correct provision of housing sizing and type.	1
Priority should be given to larger developments	1
Allocating a mix of site sizes would ensure sufficient flexibility. A range of site sizes would allow housing allocations to be proportionate to the size of the settlement.	1

**Should only small sites be allocated to contribute to the government objectives of providing housing under half a hectare? (around 10 to 15 dwellings)**



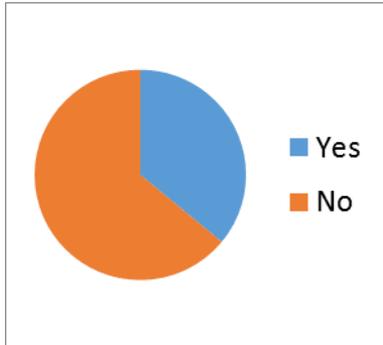
<b>Yes</b>	<b>28.57%</b>
<b>No</b>	<b>71.43%</b>
<b>Points raised include:</b>	<b>No. of occurrences</b>
Smaller developments less likely to provide enough affordable housing, therefore in the main, housing sites should be a minimum of 15 dwellings.	2
The DPD should not be reliant on allocated small sites alone. It would be appropriate to allocate a range of site sizes to allow the Council to meet the objectives of the Housing White Paper, whilst also providing flexibility to respond to existing and future local need. Range of small and large sites equally important for allocation in the RASA DPD. If only smaller sites are allocated this will seriously reduce the delivery of affordable housing. By allocating only smaller sites you will seriously deplete the delivery of affordable housing, given the national policy threshold of more than 10 houses for the requirement for inclusion of affordable housing.	4

**Should larger sites be allocated to contribute to providing a range and mix of housing including affordable housing?**



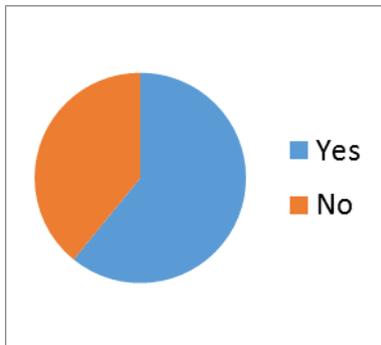
<b>Yes</b>	<b>67.86%</b>
<b>No</b>	<b>32.14%</b>
<b>Points raised include:</b>	<b>No. of occurrences</b>
Every development should include a number of affordable homes. RASA DPD should consider alternative flexible options for the provision of affordable housing, such as off-site financial contributions, to support the delivery of affordable housing in rural areas. We would propose a requirement that all new build includes a minimum number of affordable houses after which a developer could produce market price dwellings.	3
Planning process to produce larger, good quality family homes should be made easier.	1
Site sizes should be appropriate to size of each settlement. Difficult to prescribe to national densities for housing in rural areas as at the local level plot sizes and density contribute greatly to the character of villages in rural Herefordshire. It would not make sense to swamp these settlements and change the nature of the settlement itself – whatever type of housing were built, RA3 settlements should not have any large scale development and only infill should be permitted. In order for development to be sustainable there must be an assessment of where development would be most sustainable. As the housing targets are indicative it would be possible to adopt a more sensitive approach to development in these rural areas.	4

**Should the RASA DPD include allocated sites specifically for affordable housing and/or starter homes?**



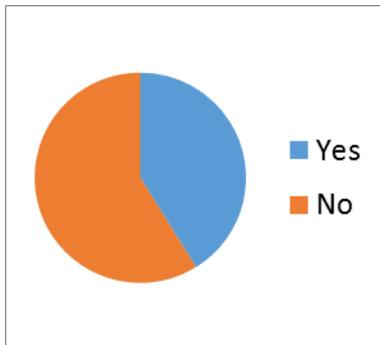
<b>Yes</b>	<b>36%</b>
<b>No</b>	<b>64%</b>
<b>Points raised include:</b>	<b>No. of occurrences</b>
Approach should include initiatives such as Community Land Trusts, self- build and co-housing.	1
HC should be cautious in allocating specific sites for affordable housing/starter homes only. Sites should not be subject to such policy burdens that their ability to be developed viably is threatened. Site allocations should be sufficiently flexible.	1

**Should the RASA DPD include allocated sites specifically for employment growth?**



<b>Yes</b>	<b>60.87%</b>
<b>No</b>	<b>39.13%</b>
<b>Points raised include:</b>	<b>No. of occurrences</b>
Should apply to market towns only	1
Due diligence should be given to the Herefordshire Economic vision in order for county to be nationally recognised as a tourist destination.	1
This would require too much coordination between economic activity and new housing both in timing and availability.	1

**Are there elements of the Economic Vision which could be included within the RASA DPD?**



<b>Yes</b>	<b>41.18%</b>
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<b>No</b>	<b>58.82%</b>
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<b>Points raised include:</b>	<b>No. of occurrences</b>
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Opportunities for economic boost via tourism projects need adequate policy provision. Tourism should be supported by appropriate infrastructure and protection against potential damage to landscapes by development.	2
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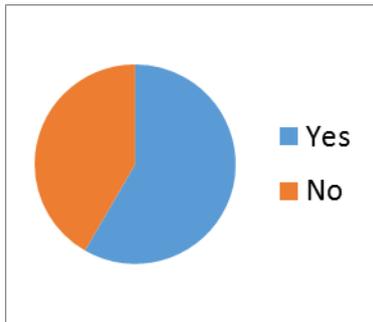
Not sure. Don't understand question.	2
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Provision should be made for smaller enterprises in rural areas including sustainable transport.	1
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Maximise use of brownfield sites prior to greenfield being considered for development.	1
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<b>Additional comments</b>	
<b>Brockhampton Group Parish Council</b> Farm diversification for tourism.	

**Should the RASA DPD designate Local Green Space where appropriate?**

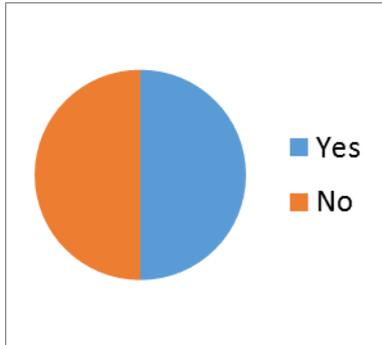


<b>Yes</b>	<b>58.33%</b>
<b>No</b>	<b>41.67%</b>
<b>Points raised include:</b>	<b>No. of occurrences</b>
There may be valuable information gathered from parish consultation during work on NDPs which could be used to inform decisions on correct provision of green space.	1

**If you answered yes to the last question, are there any settlements where Local Green Space could be designated?**

<b>Points raised include:</b>	<b>No. of occurrences</b>
Equal consideration should be given to sites intended for recreation and formal sports. Green space within a rural village is as important as within market towns.	2
Unused football pitch at Orcop for housing and green open space.	2
Definition of green space should be all land outside residential property boundaries.	1
Not sure	1
<p><b>Additional comments</b></p> <p><b>Brockhampton Group Parish Council</b> Ecological reports to support local opportunity.</p>	

**Are there any other policy areas which should be included within the RASA DPD?**



<b>Yes</b>	<b>50%</b>
<b>No</b>	<b>50%</b>
<b>Points raised include:</b>	<b>No. of occurrences</b>
Consideration of development management policies covering historic environment for inclusion in the DPD. Possibility of policies within DPD covering local assets in terms of character, heritage, ecological and landscape value. Policy for protection of landscape and careful regulation regarding placement of business units and retail parks. Flexible approach to allow discerning provision for parishes differing in nature and size. Provision for communities to help develop proposal to meet local needs, for example type of housing. Sympathetic distribution of housing development. Where a five year housing land supply cannot be proved, the policy should revert to a case by case basis to maintain the fluidity of the planning system. This approach should be made clear in guidance. Where a case by case basis is used, sites outside the development boundaries should not be disregarded.	8
Major infrastructure projects such as new bypass. Adequate infrastructure and health care to support proposed economic growth. Mindful allocation of land, maximising use of existing services and amenities. Consideration of provision as new sustainable technologies such as electric vehicles become more prevalent.	6
Support for good quality build by local tradespeople.	1
Support for pro-active use of open space such as allotments, as well as protection of wildlife and rural surroundings.	2

## **Additional comments**

### **Historic England**

We support the reference to the historic environment within paragraph 2.5 and consider that it could usefully be expanded upon to highlight some of the key heritage assets in the rural landscape and the contribution that the historic environment makes to Herefordshire and its economy. We support the reference to the historic environment within a sub section of paragraph 3.2 and we would recommend that the term 'historic assets' is amended to 'heritage assets' for conformity with the language in the National Planning Policy Framework (NPPF). Page 39 raises the issue of other policy areas and we would request that the Council considers whether there are any historic environment development management policies that may be required to address specific issues relevant for this DPD. Would the RASA benefit from a locally distinctive heritage policy that considers issues such as historic farmsteads, rural character such as historic landscape, field boundaries, heritage tourism etc. We recognise that there are a number of strategic policies relating to the historic environment in the Core Strategy.

### **Brockhampton Group Parish Council**

Transport, Primary Health Care

<b>Are there any additional comments you have upon the content of the document?</b>	
<b>Points raised include:</b>	<b>No. of occurrences</b>
Consideration within parishes of sustainable development opportunities, leading to assistance with delivery of major projects such as roads, schools and parkland. Provision of good quality housing and adequate transport around the city to attract business owners.	2
Provision of a range of housing sizes for rural development but with focus on merits of smaller units, being more affordable and not overloading existing parish amenities.	1
How will situation where a parish slows down in creation of NDP be dealt with? RASA DPD should be utilized where no NDP in place in order to provide adequate policy basis.	2
Need for assurances that growth will happen within the listed settlements. Possible options for additional development around more sustainable settlements around the county should be explored instead. It seems unlikely that major new employment will be created in the rural parts of the county, and so we will face a large increase in commuting to Worcester, Gloucester and Cheltenham as well as Hereford City. The RASA DPD is an opportunity to protect the rural parts of Herefordshire from the damage that will otherwise occur, and I don't see that opportunity being taken in the current version.	3
Boundaries which fall within or in the setting of the AONB should be very carefully considered and take into account their impact on the surrounding landscapes. Boundaries should reflect the historic settlement patterns and protect these settlements from overdevelopment. Local Green Space should be designated where appropriate. Consideration of positive enhancement measures taking into account Herefordshire Council's Green Infrastructure Strategy; an updated Ecological Network Map; the settlement characteristics for each area defined within the Landscape Character Assessment; the need to contribute positively to the protection and enhancement of the two AONBs and the setting of neighbouring AONBs and Brecon Beacons National Park; positive measures to support the Rivers Wye and Clun SACs, including any Nutrient Management Plan objectives; and delivering benefits to the natural environment as suggested by Natural England in its advice upon neighbourhood plans. It would be useful to set standards for open space provision, especially using Natural England's Accessible Natural Greenspace standards (ANGSt). Opportunities to maximise the county's tourism potential should be adequately supported in the DPD.	3

<p>The next consultation needs to do more to communicate with local people. In failing to produce an NDP, Parish Councils have denied their parishioners the best option of influencing future development in their area.</p>	<p>1</p>
<p>The core strategy provides enough guidance and enough constraints as it is. This RASA DPD could become too prescriptive and date very quickly. There also looks like the council are taking opportunities to further restrict in some areas or in other cases change policy where it suits them (town centres). This is not appropriate or fair. I feel planning resource could be used more effectively elsewhere.</p>	<p>1</p>
<p><b>Additional comments</b></p> <p><b>Brockhampton Group Parish Council</b>  A questionnaire has been completed online, but the Parish Council would like to make additional representations regarding the Bromyard HMA. The Parish Council feel strongly that they should not be included in the Bromyard HMA (Option 8), but should be treated as per other parishes under the RASA DPD (Options 1 to 6). We would also like to draw your attention to a possible error in 'Table 3', where the relevant settlements for Brockhampton Group are listed as Brockhampton and Bringsty, but this conflicts with 'Figure 4.14' where the settlements listed for proportionate housing developments are Linton and Bringsty. We suspect the confusion has arisen because there are two Lintons in Herefordshire. Could we also seek clarification as to how these settlements are identified?</p> <p><b>Network Rail</b>  I would strongly urge that when the council undertakes its viability testing for any proposed allocated sites it considers the impact the proposal may have on the railway infrastructure.</p> <p><b>Welsh Water</b>  Whilst we do not have a specific preference our responses to Neighbourhood Plans tend to offer comments on the capabilities of our assets to accommodate the growth proposed, as such our view is that Option 1 (rely on NDPs and policy RA2) doesn't provide the appropriate further policy basis that a Neighbourhood Development Plan would offer. We therefore feel that the RASA DPD should cover those areas not covered by a NDP.</p> <p>We also feel that as Bromyard is designated as a market town, should a NDP not be forthcoming a separate Bromyard Development Plan Document be produced in line with Option 7.</p> <p><b>Shropshire Council</b>  I've had a look at the document with a countryside/Gypsy &amp; Travellers perspective but don't have anything specific to raise although as an aside Figure 3 – Map showing Herefordshire in its wider context should refer to Shropshire Council rather than County Council.</p>	

**Environment Agency**

It is important that the forthcoming Rural Areas DPD, and associated forthcoming evidence, offers robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period.

We would advise that sites are assessed using relevant environmental constraints. For example Flood Risk, Source Protection Zones (groundwater risk), Landfills sites etc.

We would be happy to discuss those key issues, assessments etc. necessary to inform the appropriateness and deliverability of specific sites along with opportunities for environmental enhancement.

To help inform your options and ensure a sound plan, as advised previously, your Council's Strategic Flood Risk Assessment (SFRA) will need to be reviewed and updated to consider the current submission, the latest climate change guidance, and changes to National Planning Policy.

We would point out that sites with a catchment of less than 3km<sup>2</sup> would not have a floodplain associated with the on our Flood Map for Planning but this does not mean that flood risk is not an issue. You should also discuss matters relating to pluvial flood risk and management of Ordinary Watercourses with your Land Drainage team as the Lead Local Flood Authority (LLFA)

The evidence base will need to demonstrate that the waste water infrastructure can accommodate the proposed housing numbers. This is of particular importance in relation to the designated status of the River Wye (SAC/SSSI) and the sensitivity of this watercourse, as highlighted in your Policy SD4 of your adopted Core Strategy.

It is essential that Water Framework Directive (WFD) is fully integrated into the Local Plan process and that all future development helps to address the issues that currently prevent the watercourse from achieving Good Ecological Status or Potential GES/GEP.

Future development should help to facilitate the restoration of watercourses, such as deculverting of any watercourses within or on the boundary of a site, naturalizing artificially engineered river bank or beds, and providing an adequate riparian corridor in meeting flood risk, link to WFD objectives.

**Forest of Dean District Council**

Thank you for your consultation. We note the proposed approach and the way in which you anticipate accommodating NDPs. We look forward to further consultation as the Plan evolves.

**Monkton and Stretford Parish Council**

Monkland and Stretford Parish Council have opted out of the Neighbourhood Plan option, and opted for the DPD process.

**Moreton on Lugg Parish Council**

Moreton on Lugg parish Council have now opted out of producing a Neighbourhood Plan, and opted for the DPD process.

**Cradley Parish Council**

As the parish Council is well on their way with their NDP I assume no response is required.

**Wellington Heath Parish Council**

As the Parish Council are well on their way with an NDP, I assume no response is required from us.

**Hereford City Council**

I formally lodge with you that Hereford City Council will not be making a response to this consultation as our issues are being dealt with within the Hereford Area Plan and all our neighbouring parishes have NDPs upon which we have been, or will be, consulted.

**The Coal Authority**

In respect of the specific questions asked in the issues and options documents the Coal Authority has no comments to make.

However, at this early stage in the process we would like to take this opportunity to identify that within Herefordshire area there are 29 mine entries, areas of potential unrecorded shallow coal mine workings and areas where coal has been removed by surface mining operations.

The Coal Authority would expect to see the site selection criteria for any allocations proposed to include consideration of ground conditions/land stability in order to ensure that any potential impacts from coal mining legacy issues are fully considered. We would also expect to see any site selection criteria consider the potential sterilisation of mineral resources.

**Gloucestershire County Council**

Thank you for consulting Gloucestershire County Council. I can confirm that we have no comments to make on the document.

**Brockhampton Group Parish Council**

Unnecessarily complicated document.

The questionnaire is poorly set out and does not give adequate weight to the views of the Parish Council (which represent the whole community) over the views of individuals.