



Planning Department
 Herefordshire Council
 Plough Lane
 Hereford
 HR4 0LE

7th October 2018

RE: EXISTING SPORTS FIELD AND RECREATION AREA IN FOLEY STREET, HEREFORD

- 1) Please provide proof of ownership of this land because we understand that it was left to the families of the surrounding area for their enjoyment.
- 2) Notice to try and obtain outline planning permission was never posted around the sports field in Foley Street. Unofficial notice was spotted earlier this week. As a result we will follow-up this letter in more detail and with a greater number of signatures of objection.
- 3) This sports field and recreation area, with a foot path running along its length, is a well-used facility despite being poorly maintained and is the only such facility in this area. Losing this sports field would contribute to the increasing levels of inactivity by younger generations.
- 4) The loss of this recreation area would also see the dog walking area forfeited for older people in this neighbourhood. This would ultimately lead people in having to walk their dogs further afield. Such changes could well impact on the health and safety of the local population and add to the increased traffic because people will drive to other such recreation areas.
- 5) The building of the proposed new housing will contribute to one of the worst traffic problems in this part of Hereford (ie: Foley Street and Mill Street).
- 6) This type of planning application (ie: taking small areas of open land) will lead to one of the worst planning decisions ever taken when future generations look back at how current planning regulations have let them down.
- 7) Building in this type of land (ie: a former rubbish tip) will lead to problems with the houses' foundations and potentially with methanogenic gas.

Signed by the residents living in the neighbourhoods surrounding Foley Street Sports Field



Re HRI 2SF

I am surprised not to have received details about this proposal, on the other side of the railway to me, with time to look into it.

It saddens me to see a "gift to the people" thrown away in the same way Widemarsh Common was.

I shall be particularly sad to lose the trees on the other side of the railway.

The amenity play area has

been cared for less & less,
thus ensuring it is used less.

More traffic will be using
the access road than ever
before, & it is narrow.



Save



build

37 people signed this petition

whatever

Save

~~build~~ build



whatever

Entered 17/9/18.
Ref-04.



Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address:
www.herefordshire.gov.uk/herfordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.
These can be found at: www.herefordshire.gov.uk/herfordareaplan as well as at libraries and information centres across the county.

Complete the questions for as many sites as you would like to comment on.
Please include the site reference for any you are making a specific comment on.

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

If no, please explain:

There are far too many houses
already causing bad traffic
congestion

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer:

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

If yes, please supply site details:

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain:

(Please use additional box at the back of questionnaire if you need more space to comment)

About you:

Name:.....

Address:.....

.....

Email:.....

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (Fol) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways:

Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to:

Forward Planning
Herefordshire Council Offices
Plough Lane
Hereford
HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Question 8 continued...



Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address:
www.herefordshire.gov.uk/herfordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herfordareaplan as well as at libraries and information centres across the county.

**Complete the questions for as many sites as you would like to comment on.
Please include the site reference for any you are making a specific comment on.**

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

If no, please explain:

It seems you want to jam in 20 houses to a very small space. Current planning permission for the housing estates already being built have jammed in the houses. Houses back onto each other with very small gardens. No thought is made of the people who will live there. Pathetic! Your Planning Department has no idea of how to make a development that actually works for people! Cars are parked all over the place because there is nowhere for them to park, especially on the days that children play football on the pitch. Cars are parked all the way down Queenswood Drive, on the grass and on the road. There will be nowhere for children to play as they won't want to use the top field because of all the drug users who use it in the evening. The area floods whenever there is heavy rain. It has been known to spill over the road but no-one from the Council would realise that. What about all the mature trees that are on the field? They will be cut down to pack in a few more houses that are not needed. What about all the developments in Bartestree, Lugwardine, Roman Road? Twenty houses in Queenswood Drive are not going to make

the slightest difference to anything apart from the Council not having to cut the grass in the summer!

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

There is a lot of land on Hampton Park Road, beyond Holywell Gutter Lane. Why not build on the land that is currently allotments? There is not enough green space as it is in Tupsley given the population. Don't the Council want children to keep fit and enjoy the open spaces?

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer:

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain: There are enough houses already being built around Hereford at the current time. The "green" area around Queenswood Drive is unique and very much used by walkers and children. It will completely spoil the area if houses are squashed into this small space.

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

Don't know

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

If yes, please supply site details:

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain:

Don't know how you identified Queenswood Drive as a possible site. Twenty houses squashed into a small space will completely spoil the area. Hereford Council don't seem to have any idea of how to improve an area with houses. You seem to squash them in with no regard for how people will live when they're all built. Cars are parked all over pavements, gardens are tiny and back on to each other. With a bit of imagination you could transform these areas instead of completely spoiling them. Not a good idea at all. You will spoil the green space that is used by so many children and adults alike. There will be nowhere safe for them to go and there is not enough green space in Hereford as it is. The field up by the Surgery is not a safe place to go as can be seen by the many discarded syringes and "gangs" who congregate there.

(Please use additional box at the back of questionnaire if you need more space to comment)

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (Fol) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways:
Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to:
Forward Planning
Herefordshire Council Offices
Plough Lane
Hereford
HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Question 8 continued...

Latham, James

From: Singleton, Kevin
Sent: 02 October 2018 11:59
To: Gilson, Susannah
Subject: FW: Contact us form submitted

Follow Up Flag: Follow up
Flag Status: Completed

Hi Susi

We should treat this contact form as a rep as well. It's a different sire to TUP26.

Regards

Kev

From: DMScanning
Sent: 02 October 2018 10:35
To: Singleton, Kevin <Kevin.Singleton@herefordshire.gov.uk>
Subject: FW: Contact us form submitted

Hello Kevin

I believe the objection below is for you team?

Please let me know if it's not

Thanks

Lisa

From: donotreply@herefordshire.gov.uk [<mailto:donotreply@herefordshire.gov.uk>]
Sent: 01 October 2018 17:52
To: Planning Enquiries
Subject: Contact us form submitted

The contact us form has been submitted to your service area with the following details:

Caption	Value
Name	Tup27
Email	
Nature of enquiry	Planning
Message	To whom it concerns I am opposing the proposal build on Tup27. I believe that it is significant environmental importance. This is due to all the new builds already taking place and currently passed planning that will put pressure on already strained local schools and the extra vehicles that will result on already difficult roads. So already locally we have

lost a lot of green space. Tup27 has a large number of wild birds (nearly 30+) including several types of owls. I would hope that a serious bat survey would be required as bats of different sizes are seen each evening in this area. Hedgehogs also feed within this area each night also. There has been lots of sightings also of Muntjac deer within this park and locally. When looking at this site I believe account should be taken of the plot next door to it that already has planning permission for a further 6 to 8 houses which will already destroy a decent sized wild environment. I believe the loss of Tup27 would have a devastating environmental impact to local wildlife that cannot be replaced.

Latham, James

From: Singleton, Kevin
Sent: 03 October 2018 09:39
To: Gilson, Susannah
Subject: FW: Contact us form submitted

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Susi

Another rep attached (I think it's the same as one yesterday from a different address).

Regards

Kev

From: Planning Enquiries
Sent: 03 October 2018 09:35
To: Singleton, Kevin <Kevin.Singleton@herefordshire.gov.uk>
Subject: FW: Contact us form submitted

Hello

I would be grateful if you could respond to the email below please.

Regards
Technical Support Officer

Herefordshire.gov.uk

Planning Services, Development Management
Herefordshire Council, Council Offices
Plough Lane Hereford HR4 0LE

 Please consider the environment before printing

Any opinion expressed in this e-mail or any attached files are those of the individual and not necessarily those of the Herefordshire Council. This e-mail and any attached files are confidential and intended solely for the use of the addressee. This communication may contain material protected by law from being passed on. If you are not the intended recipient and have received this e-mail in error, you are advised that any use, dissemination, forwarding, printing or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please contact the sender immediately and destroy all

From: donotreply@herefordshire.gov.uk [<mailto:donotreply@herefordshire.gov.uk>]
Sent: 01 October 2018 17:52

To: Planning Enquiries <planning_enquiries@herefordshire.gov.uk>

Subject: Contact us form submitted

The contact us form has been submitted to your service area with the following details:

Caption	Value
Name	Tup27
Email	
Nature of enquiry	Planning
Message	<p>To whom it concerns I am opposing the proposal build on Tup27. I believe that it is significant environmental importance. This is due to all the new builds already taking place and currently passed planning that will put pressure on already strained local schools and the extra vehicles that will result on already difficult roads. So already locally we have lost a lot of green space. Tup27 has a large number of wild birds (nearly 30+) including several types of owls. I would hope that a serious bat survey would be required as bats of different sizes are seen each evening in this area. Hedgehogs also feed within this area each night also. There has been lots of sightings also of Muntjac deer within this park and locally. When looking at this site I believe account should be taken of the plot next door to it that already has planning permission for a further 6 to 8 houses which will already destroy a decent sized wild environment. I believe the loss of Tup27 would have a devastating environmental impact to local wildlife that cannot be replaced.</p>

Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address:
www.herefordshire.gov.uk/herfordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herfordareaplan as well as at libraries and information centres across the county.

**Complete the questions for as many sites as you would like to comment on.
Please include the site reference for any you are making a specific comment on.**

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

If no, please explain:

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

My brother and I own the land south of The Kings Acre Road and adjacent to Thr23. The proposed Western Relief road runs through our land and we see the potential for housing to spread west between Thr23 and the relief road. Whilst we appreciate that this is outside the current Area plan consultation, we feel that it should be included in the future as the proposed road provides a boundary.

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer:

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

If yes, please supply site details:

It would be more appropriate for university accommodation/ buildings to be centrally sited.

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain:

(Please use additional box at the back of questionnaire if you need more space to comment)

About you:

Name: Mrs J. Abell

Address: [REDACTED]

Email: [REDACTED]

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (FoI) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways:
Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to:

Forward Planning
Herefordshire Council Offices
Plough Lane
Hereford
HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Question 8 continued...

Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address:
www.herefordshire.gov.uk/herfordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herfordareaplan as well as at libraries and information centres across the county.

**Complete the questions for as many sites as you would like to comment on.
Please include the site reference for any you are making a specific comment on.**

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

If no, please explain:

The identification of site Bur09 as having potential is agreed.

The whole of the area extends to 29.15 hectares. Reference is made in the Supporting Statement attached to a planning application being prepared for approximately 90 dwellings on 3.68 hectares off Canon Pyon Road. With reference to evidence prepared to date, this can be achieved taking all factors into account.

If similar densities are applied to the whole of Bur09, a larger number of dwellings would be accommodated on the larger area.

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer:

The 3.68 hectare site at Canon Pyon Road (Part of Bur09) has been identified principally to contribute to short term needs over a 5 year period. It is for this reason that a planning application is being prepared in the light of a persisting 5 year land supply shortfall.

The attached Supporting Statement elaborates further.

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

If yes, please supply site details:

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain:

With reference to the technical studies prepared to support the emerging planning application comments are provided on the key issues highlighted in the Technical Site Assessments.

Please refer therefore to the attached Supporting Statement.

(Please use additional box at the back of questionnaire if you need more space to comment)

About you:

Name:...Taylor Wimpey plc

.....

Address:.....c/o Asbri Planning Ltd, Unit 9 Oak Tree Court, Mulberry Drive, Cardiff Gate Business Park, Cardiff CF23 8RS.

.....

.....

Email:... Alex.Anderson@taylorwimpey.com keith@asbriplanning.co.uk
pete@asbriplanning.co.uk

.....

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (FoI) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways:
Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to:
Forward Planning
Herefordshire Council Offices
Plough Lane
Hereford
HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Question 8 continued...

Hereford Area Plan (HAP)

Housing and
Employment Site
Options
Consultation

Land at Cot Barn
Farm, North of
Roman Road,
Hereford

(Part of Bur 09)



Contents

Section 1

Introduction

Section 2

Site description and background

Section 3

Planning Policy Context

Section 4

Detailed Response to Questions 1, 3 and 8

Section 5

Conclusion

Appendix 1 – Site Location Plan

Appendix 2 – Illustrative Masterplan

Introduction

- 1.1 Asbri Planning Ltd. has been instructed by Taylor Wimpey to respond to the current Hereford Area Plan (HAP) Housing and Employment Site Options Consultation in respect of land at Cot Barn Farm, North of Roman Road, Hereford (Bur09).
- 1.2 Taylor Wimpey has an option on the land outlined red on the Site Location Plan attached at **Appendix 1**. This land is contained within part of the Bur09 allocation.
- 1.3 Work is currently underway with a view to submitting an outline planning application for the construction of up to 136 homes (with all matters reserved except for access), to include public open space, landscaping and associated infrastructure works and demolition of bungalow known as Cotswold. This proposed outline planning application area is identified in blue on the plan in **Appendix 1** and is known as Land off Roman Road. Consequently, land to the north under the same option as the planning application, but outside the scope of the advanced draft planning application, forms part of these representations but is not subject to the detailed technical studies that have been undertaken for the application site. This is identified in orange in **Appendix 1**.
- 1.4 Taylor Wimpey also has an option on land in the western part of Bur09, known as Land at Canon Pyon Road. This is identified in pink on the plan in **Appendix 1**. Land at Canon Pyon Road is also subject to an advanced draft planning application but is subject to separate representations to the HAP.
- 1.5 Finally, the Illustrative Masterplans produced for the two planning applications above demonstrate that access can be achieved from each site into the land in between the two options controlled by Taylor Wimpey identified in **Appendix 1**, which is controlled by a third party. Consequently, it is not appropriate to make detailed representations on this element within this report. Notwithstanding, Taylor Wimpey supports the allocation of this part of Bur09 should its delivery contribute to a more comprehensive and more appropriate scheme overall as the whole of Bur09 can come forward as separate entities, but cognisant of each other, or as a comprehensive development.
- 1.6 Taylor Wimpey plc therefore welcomes the identification of the wider area of land Bur 09, as being considered as suitable for development in the plan period, with the two planning application sites being deliverable in the short term (0-5 years).
- 1.7 This submission accompanies the consultation questionnaire and provides further information based on technical studies prepared to support the Land off Roman Road planning application area. The studies are summarised but can be made available on request. In this context Questions 1, 3 and 8 on the forms are of particular relevance, and are

addressed accordingly. As the planning application does not cover all of Bur09 (indeed Taylor Wimpey does not control the whole of Bur09) there are no technical studies to rely on for these areas but the questions in relation to these areas have still been completed as far as is practicable.

- 1.8 This supporting statement briefly describes the site and the background to current proposals in Section 2; Section 3 appraises the site within the context of planning policy; Section 4 elaborates on Questions 1, 3 and 8 of the submitted forms; whilst Section 5 concludes the Statement.

Site Description and Background

2.1 The land to the north of Roman Road which is the subject of the advanced draft planning application consists of two field parcels amounting to approx. 5.1 hectares in area. The additional land immediately north of the planning application site comprises two further field parcels amounting approx. 6.4 hectares in area. For completeness, the Land off Canon Pyon Road parcel comprises one field and measures approx. 3.7 hectares. Taylor Wimpey therefore controls approx. 15.2ha of the wider 29.15ha proposed allocation, on the eastern and western ends of the proposed allocation.

2.2 The individual land parcels are described in more detail below.

Bur09 – The Roman Road planning application site

2.3 Land north of Roman Road consists of two field parcels amounting to 5.1 hectares in area. The site is irregular in shape and forms a rough 'U' shape. It is located to the rear of properties fronting Roman Road, with the recently approved and currently under construction development of 450 homes for Bloor Homes abutting the application site to the east. Open fields lie to the north and west and a small number of dwellings and industrial units lie within the 'U', outside the red line. To the south the site is bounded by the rear of properties along the A4103 Roman Road.

2.4 The eastern field parcel falls roughly north to south from approx. 76m AOD in the north to approx. 69m AOD in the south. The western parcel falls roughly north west to south east from approx. 82m AOD in the north west to approx. 69m AOD in the south east.

2.5 Access to the existing site, industrial units and residential dwellings is via an existing spur off the A4103 Roman Road. The application proposes widening this access by acquiring and demolishing Cotswold, an existing bungalow fronting the directly onto the A4103 Roman Road. Taylor Wimpey has an option to undertake these works as and when necessary.

2.6 The planning application site, alongside the adjacent site to the west (between this site and the Land off Canon Pyon Road site (which is subject to a separate HAP submission)) was promoted as a potential western extension to the Core Strategy strategic site at Holmer West (SHLAA site ref. O/Her/001 and HLAA/076.00). This wider promotion was on behalf of a number of landowners and Taylor Wimpey does not have an interest in all of the fields contained in the wider promoted site.

2.7 This wider site was further promoted through the Hereford Area Plan Issues and Options exercise and associated Call for Sites in May 2016, as a potential non-strategic allocation.

- 2.8 Outline approval for up to 460 homes on land to the immediate east of the site was approved in May 2017 under application reference P150478/O. Reserved matters for 82 homes pursuant to the above outline planning permission was approved in July 2017 under application reference P171073/RM and is currently under construction.
- 2.7 A Pre-Application meeting was held with officers in relation to the proposed development on the planning application site on 4th October 2017 (Ref: 172975/CE).

Bur09 – Land north of the Roman Road planning application site

- 2.8 Two additional field parcels amounting to approx. 6.4 hectares and abutting the planning application site also lie within the control of Taylor Wimpey. This part of the site slopes gently upwards from the application site to the northern edge of the HAP area and it abuts the third party land to the west. The field boundaries are marked by hedgerows.

Bur09 – Land off Canon Pyon Road site

- 2.9 This site is subject to separate representations therefore is not addressed further here.

Planning Policy Context

Introduction

- 3.1 The starting point in considering development at the location proposed is the statutory development plan which consists of the Herefordshire Council Local Plan Core Strategy (adopted October 2015). In addition to the above, other key material considerations include the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG), the saved policies of the Unitary Development Plan (UDP), Herefordshire Council Supplementary Planning Guidance (SPG), the emerging Hereford Area Plan, the Hereford Transport Strategy and the Herefordshire Infrastructure Delivery Plan. These are dealt with accordingly below.

National Planning Policy Framework (NPPF)

- 3.2 The latest National Planning Policy Framework (NPPF) was published on the 24th July 2018. It constitutes guidance for Local Planning Authorities (LPAs) and decision-takers and sets out the Government's planning policies for England and how these are expected to be applied.
- 3.3 The NPPF acknowledges that the planning system is plan-led and therefore the starting point for decision making, as required by planning law, is for planning applications to be determined in accordance with the development plan unless other material considerations indicate otherwise. It goes on to identify that the NPPF must be taken into account when preparing the development plan and that it is a material consideration in determining applications.

Achieving sustainable development

- 3.4 Paragraph 8 of the NPPF continues to state that achieving sustainable development means that the planning system has three overarching objectives – economic, social and environmental.
- 3.5 At the heart of the NPPF is a presumption in favour of sustainable development as set out in paragraph 11. In terms of decision taking this means:

"c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and*

demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

Evidence Base

- 3.6 It is stated at paragraph 31 that Local Plans should be underpinned by relevant and up to date evidence. This should be justified by relevant and up to date evidence which is focused tightly on supporting and justifying the policies concerned, taking into account relevant market signals.

Delivering a sufficient supply of homes

- 3.7 Paragraph 59 states that *"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."*

Planning for housing

- 3.8 Paragraphs 67 & 68 show what is expected of local authorities when planning for housing:

"Planning policies should:

- *Identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.*
- *Identify a supply of specific deliverable sites for years one to five and specific developable sites or broad locations for growth over a 15 year time period.*
- *Identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare unless there are strong reasons why it cannot be achieved".*
- *Support the development of windfall sites through their policies and decisions*
- *Work with developers to encourage the subdivision of large sites where this could help to speed up the delivery of homes.*

Maintaining supply and delivery

- 3.9 Paragraph 73 states that *'Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. '*

- 3.10 Paragraph 73 also states that the supply of specific deliverable sites should include a buffer of 5% (to ensure competition in the market),

- 10% (where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan), or 20% (where there has been significant under delivery of housing over the previous three years).
- 3.11 Paragraph 74 states that a five year supply of deliverable housing sites can be demonstrated where it has been established in a recently adopted plan or in a subsequent annual position statement.
- 3.12 Paragraph 49 of the March 2012 NPPF stated that *“relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites”*. This provision still applies, but has been relocated to paragraph 11 and its accompanying footnote.
- Achieving well-designed places***
- 3.13 Paragraph 124 states that *“The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”*
- 3.14 Paragraph 127 takes this further and sets out more detailed guidance.
- 3.15 Finally on this aspect, paragraph 128 states that *“Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests.”*

Planning Practice Guidance

- Design***
- 3.16 This guidance note, which wasn't updated in July 2018, reinforces the view of the NPPF, highlighting that good quality design is an integral part of sustainable development, and states that good design responds in a practical and creative way to both the function and identity of a place. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations which should:
- *ensure that development can deliver a wide range of planning objectives;*
 - *enhance the quality of buildings and spaces; and*
 - *address the need for different uses sympathetically.*

Housing and economic development needs assessments

3.17 In accordance with the NPPF, this guidance supports LPAs in objectively assessing and evidencing development needs for housing (both market and affordable) which includes the Strategic Housing Market Assessment. In the context of this guidance, the need for housing refers to the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period which should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand.

Herefordshire Local Plan Core Strategy

3.18 The Core Strategy is a key policy document that forms part of the Local Plan for Herefordshire and is used in the determination of all planning applications submitted to the Council alongside saved policies contained in the Unitary Development Plan, discussed below. The Core Strategy was adopted by the Council on 16th October 2015 and puts in place a strategic planning framework to guide change and development in the County over the period 2011-31.

3.19 The site is not included as part of a strategic release in the adopted Core Strategy, and is not identified for development in the UDP. It is, however, being promoted as a non-strategic site through the Hereford Area Plan.

3.20 Policy SS2 of the Core Strategy Local Plan identifies the housing requirement over the Plan period 2011-2031 of 16,500 homes, with 6,500 to be delivered within Hereford. It must be noted that both these figures of 6,500 and 16,500 are *minimum* targets. For the purposes of Policy SS2 this site lies immediately adjacent to the city boundary and therefore within the Hereford Area Plan Boundary. Consequently, it can contribute to the minimum requirement of 6,500 homes for Hereford as set out in Policy SS2 and the wider minimum requirement of 16,500 homes over the Plan period.

3.21 The following Core Strategy policies are considered to be most applicable to the sites (both the application site and the rest of the land within Bur09):

Policy	Title
Vision, Objectives and Spatial Strategy	
SS1	Presumption in favour of sustainable development
SS2	Delivering new homes
SS3	Releasing land for residential development
SS4	Movement and transportation
SS6	Environmental quality and local distinctiveness
SS7	Addressing climate change
Place Shaping Policies	
HD1	Hereford

HD3	Hereford movement
General Policies	
H1	Affordable housing - thresholds and targets
H3	Ensuring an appropriate range and mix of housing
OS1	Requirement for open space, sport and recreation facilities
OS2	Meeting open space, sport and recreation needs
MT1	Traffic management, highway safety and promoting active travel
Environmental Quality	
LD1	Landscape and townscape
LD2	Biodiversity and geodiversity
LD3	Green infrastructure
SD1	Sustainable design and energy efficiency
Delivery, Implementation and Monitoring	
ID1	Infrastructure delivery

Other Material Considerations

- 3.22 **The Hereford Area Plan** will set out the detailed proposals to ensure the full delivery of the city specific policies in the Core Strategy.
- 3.23 **The Hereford Transport Strategy** includes a programme of infrastructure and services to facilitate growth proposals including:
- real time information on core bus network and stop upgrades;
 - active travel network;
 - extension of Destination Hereford project;
 - Hereford transport hub;
 - city centre refurbishments;
 - bus priority measures;
 - rail track and signal improvements between Hereford and Malvern; and
 - facilities to support electric and low carbon vehicles.
- 3.24 Particular transport infrastructure necessary to bring forward the Core Strategy proposals is detailed in the **Infrastructure Delivery Plan**.

Detailed Response to Questions 1, 3 and 8

Question 1 – Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

- 4.1 It is agreed that Site Bur09 – Land at Cot Barn Farm, Roman Road should be identified as having potential for residential development. In this submission emphasis is placed on the south – eastern part of the overall site which is subject to ongoing work on a planning application, scheduled to be submitted in the near future, given that there are more technical studies available for this part of Bur09 and given that it is considered that it could be delivered in the short term (0-5 years). This planning application site is also known as Land off Cot Barn Farm and/or Land off Roman Road. Details in relation to land outside the Roman Road application site (i.e. the remainder of Bur09 that is within Taylor Wimpey's control) are referred to as appropriate.
- 4.2 Whilst there is broad agreement to the allocation of Bur09 as a whole, Taylor Wimpey have concerns in relation to the indicative housing figure given for the whole of Bur 09 as it shows a potential capacity of 435 dwellings. Further, the Site Options document and the advanced draft planning application both propose access off the A4103 Roman Road. However, the proposed allocation does not include an access onto Roman Road. This therefore needs to be addressed in future iterations of the proposed allocation.
- 4.3 The Land off Roman Road planning application will seek outline planning permission for the proposed construction of up to 136 no. homes and associated access, a locally equipped area of play (LEAP), landscaping and associated infrastructure works and the demolition of the bungalow known as Cotswold. This equates to a density of approx. 35 dph.
- 4.4 In accordance with Herefordshire Council's standards for affordable housing provision in the Core Strategy, it is anticipated that 35% of the dwellings will be affordable homes.
- 4.5 Access is to be considered in the application with all other matters reserved. The proposal entails the formation of a new vehicular access point onto Roman Road, which will be via an improved ghost island priority junction.
- 4.6 Though the internal access arrangement would be approved at reserved matters stage, the submitted Illustrative Masterplan, included as

Appendix 2 of this submission, demonstrates how 136 homes could be delivered on site and therefore the internal highway network is likely to be similar to that shown in the Illustrative Masterplan. The Illustrative Masterplan also demonstrates how the remainder of Bur09 could be accessed through the proposed planning application site to the north and west.

- 4.7 Whilst the current proposals are only focused on the 5.1 hectares subject to the planning application being progressed, the above (along with the Land off Canon Pyon Road Illustrative Masterplan (addressed in those representations)) demonstrates that the potential capacity for the whole of Bur09 is capable of delivering far in excess of the 435 dwellings referred to in the consultation documentation. It is noted in the Technical Site Assessment that this could be extended to 500 dwellings if the issues highlighted in the assessment were addressed. However, this would still result in an inefficient use of land.
- 4.8 The net developable area of the Cot Barn Farm site has been established through the planning application process as 3.89 hectares with some 1.2 hectares given over to green infrastructure. Consequently this net area amounts to 76.5% of the total area, with a resulting density of 35 dwellings per hectare. If this were applied to the whole 29.15 hectares it would result in some 22 hectares being developable. Applying a density of 35 per hectare would result in a capacity of some 770 dwellings. A similar calculation has been applied to the Canon Pyon Road site where a lower percentage of developable area (68.75%) has been identified. Even if this were applied to the whole Bur09 site, it could accommodate 700 dwellings. If, on the other hand, a density is applied as per paragraph 5.24 of the consultation document which reflects the 30 dwellings per hectare on sites on the fringes of the urban area, a total of 600 dwellings could be potentially accommodated.
- 4.9 Whilst it is acknowledged that the above net developable areas and densities are a crude high level analysis for the whole of Bur09, the technical studies undertaken for the two application sites demonstrate that approx. 225 homes can be delivered comfortably across 8.8ha of the wider Bur09 allocation.
- 4.10 Consequently, it can be concluded that, while appearance, landscape, layout and scale are reserved matters, the Illustrative Masterplan that has been prepared demonstrates how up to 136 homes could be delivered on site with a varied mix of starter and family homes, including 35% affordable homes, at a net density of 35 dwellings per hectare. Given the above, it is considered that the proposed development complies with NPPF and Core Strategy Policies SS6, SS7, H3, OS1, OS2, MT1, LD1, LD2 LD3, and SD1.
- 4.11 Whilst the current proposals are only focused on the 5.1 hectares subject to the planning application being progressed, the above demonstrates that the potential capacity for the whole of Bur09 is

capable of delivering far in excess of the 435 dwellings referred to in the consultation documentation.

Question 3 – Do you think that any particular sites should be developed in the short, medium or long term?

4.12 The 5.1 hectare site at Cot Barn Farm has been identified principally to contribute to short term housing needs over the immediate 5 year period. It is for this reason that, in spite of the current unallocated status of the site, a planning application is being prepared in the light of a persistent 5 year housing land supply shortfall in Herefordshire, and the provisions of the previous and current versions of the NPPF.

4.13 It is therefore the intention that the planning application be submitted shortly with a view to Taylor Wimpey developing the site over the immediate 5 year period.

4.14 Under the above context, the site meets the definition of *deliverable* under the definition which is retained in the Glossary in Annex 2 of the NPPF which states that:

*“To be considered deliverable, sites for housing should be **available** now, offer a **suitable** location for development now, and be **achievable** with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered **deliverable** until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.” [our emphasis]*

4.15 It therefore falls to assessing the site against the criteria outlined above to demonstrate whether the site is deliverable. The application site comprises vacant land and is under the control of one landowner. The applicant is a national housebuilder. It was promoted through the Core Strategy and is being promoted by the same national housebuilder through the Hereford Area Plan as being ready for development. The site is therefore considered to be **available** now.

4.16 The site lies adjacent to the settlement boundary of Hereford, the Main Urban Area in the settlement hierarchy as identified in the Core Strategy Local Plans, Spatial Strategy Background Paper – January

2010. Hereford needs to deliver a minimum of 6,500 homes over the Core Strategy Plan Period 2011-2031, with 1,000 to 1,500 homes yet to be identified, which will be delivered through the Hereford Area Plan 2011-2031. The site is not subject to any specific designations where development should be restricted, therefore the site is considered to be a **suitable** location for development now.
- 4.17 The technical studies that have been prepared in order to accompany the planning application demonstrate that there are no known constraints which would prevent development commencing, and being completed, within the next 5 years. This is supported by the fact that the site has the involvement of a national house builder. There is therefore a realistic prospect that housing will be delivered on the site within five years therefore the site is considered to be **achievable**.
- 4.18 Consequently, the site meets the tests set out in the NPPF and the glossary and as such the proposed development is considered to be **deliverable**.
- 4.19 In conclusion, the release of the site at Cot Barn Farm would represent a development which is deliverable in the short term (i.e. within the next 5 years monitoring period) and can provide a significant contribution to improving the current 5 year housing land supply shortfall.
- 4.20 In terms of the 6.4 hectares north of the application site that lies within Bur09 and within the control of Taylor Wimpey, many of the characteristics and technical issues applicable to the application site still prevail, albeit this is only known on a high level at this stage. This part of the remainder of Bur09 extends further north, closer to the proposed red route of the bypass and higher up the slope therefore other criteria need to be considered that were not as applicable in the application documentation. Notwithstanding, it is still considered that these additional parcels within Bur09 are **available** and **suitable** in accordance with the NPPF. In theory, they are also **achievable**, thus making the remainder of this part of Bur09 **deliverable**, but it is acknowledged that a more realistic timetable for delivery would be in the medium term within the Plan period.

Question 8 – Do you have any comments on the document and the approach used to identify potential sites?

- 4.21 Under the above question reference is made to the Technical Site Assessments which have informed the site assessment schedule in the main consultation document. In this instance the assessment for Bur09 is specifically referred to on Page 50 of the Consultation Paper.

- 4.22 It is acknowledged that the document recognises in Paragraph 4.3 that the site assessment is an iterative process and that more information on sites may be added on to the assessment after the consultation has taken place. This will be in line with NPPF Paragraph 31 which emphasises that plans should be supported by adequate and up to date evidence.
- 4.23 With reference to the technical studies prepared to support the emerging planning application comments are provided on the key issues highlighted in the Technical Site Assessments under the appropriate headings below. The whole of the documents referred to can be made available, if necessary, on request. Information in relation to the 6.4 hectare element of Bur09 in Taylor Wimpey's control will be produced at an appropriate stage. Technical information in relation to the Land off Canon Pyon Road element of Bur09 is contained within the representations on that site.

Highways and Transport

Access to Alternative Modes of Transport

- 4.24 The Transport Assessment (TA) undertaken by Asbri Transport establishes the conditions that exist within the surrounding transport network and then details the likely transport characteristics of the proposed development, identifying the potential impact of the proposals on the surrounding transport network.
- 4.25 The TA comments that the site is located with good access to public transport and walking distance of a number of amenities/facilities, reducing the need for private car-borne trips. Within the development itself, the development will provide the necessary pedestrian and cycle infrastructure within the site to encourage walking and cycling and the appropriate road cross sections and speed limits to support this. It can therefore be regarded as being accessible with significant scope for many trips to be made by foot and public transport.
- 4.26 A separate Travel Plan has been prepared, also undertaken by Asbri Transport, which details the approach that Taylor Wimpey will adopt to ensure that all residents of the development site are fully aware of their travel opportunities to promote the use of sustainable transport modes and to reduce the reliance on the private car.
- 4.27 Whilst the TA has been prepared in relation to the Roman Road application site, because the Land off Canon Pyon Road site is also subject to an advanced draft planning application, the TA for the Roman Road application is cognisant of the proposed development at Canon Pyon Road to ensure robustness.

Access

- 4.28 As access is not a reserved matter, full details of the proposed access are contained within the Transport Assessment. In order to

accommodate the proposed access the bungalow known as Cotswold will need to be demolished. A ghost right turn on the A4103 Roman Road into the application site is proposed and, from a technical highways design perspective, this can accommodate a significant number of additional movements over and above those likely to be generated by the 136 homes envisaged in the planning application. It is acknowledged that wider network capacity matters for the development of the whole of Bur09 would need to be undertaken.

Impact on Local Road Network

- 4.29 With regard to the proposed development's traffic impact on the operation of the local highway network, it is considered the traffic movements associated with the development proposal could be accommodated on the existing highway network and that there will not be a detrimental impact on the free flow of traffic using the local highway network.
- 4.30 The Canon Pyon Road site, also part of Bur09, and subject to a separate representation, is also subject to a planning application which, it is anticipated, will likely be submitted on or around the same time as the Cot Barn Farm application. The TA has considered the cumulative impact of both schemes for completeness. The TA concludes that *"A comparison of the no development and with development scenarios indicates that the increase in flows associated with the cumulative development proposals will have a marginal impact on the operation of the junction and the impact of the development could not be considered to be severe."*
- 4.31 As part of the consented development proposals for the Bloor Homes development, it is proposed to extend the 30mph speed limit from the Starting Gate Roundabout to a point approximately 100m west of Kempton Avenue. As part of the development proposals for this application, it is proposed to extend the revised 30mph zone further west to the A4103 Roman Road/A4110 Canon Pyon Road signalised junction. Notwithstanding, the proposed access junction has been designed based on the posted 40mph speed limit of the road.
- 4.32 It has been clearly demonstrated the development of the site will not adversely impact on the existing highway network so that the residual cumulative impacts of the development are *"severe"*, either on its own or cumulatively with the Roman Road development, and can be safely accessed in accordance with planning policy. Given the above, it is considered that the proposed development complies with and Core Strategy Policies SS4, HD3 and MT1.
- 4.33 As mentioned above, further highway network capacity analysis would need to be undertaken in relation to the whole of Bur09.

Landscape and Visual Impact

- 4.34 The Landscape and Visual Impact Assessment (LVIA) has been undertaken by CSA Environmental and considers the effects of the proposed development on both landscape character and views. The LVIA confirms that the site is not covered by any designations for landscape character or quality.
- 4.35 The LVIA assesses the site's quality, sensitivity and value as medium, and that the proposed development will be well related to the existing housing to the south and west. It continues by stating that as the proposed development will be well related to the existing built development, as well as the fact that views of the new homes will be limited to those from the near distance, the effects of the proposed development on the surrounding landscape will be limited.
- 4.36 The LVIA concludes by stating that, given the above, the site is capable of accommodating the proposed development in landscape and visual terms without resulting in material landscape or visual harm to the wider landscape/townscape around the site. The same conclusions apply when considering the cumulative impact of this proposed development and the Canon Pyon Road scheme (subject to separate representations). Given the above, it is considered that the proposed development complies with Core Strategy Policies SS6 and LD1.

The Built and Historic Environment

- 4.37 Wessex Archaeology was commissioned to prepare a Historic Environment Desk-Based Assessment to assess the known and potential heritage resource within the site and the surrounding area, and to assess the likely impacts of the development proposals on this resource. This study has identified no overriding heritage constraints which are likely to prohibit development.
- 4.38 Within the site the assessment identifies the potential for the presence of buried archaeological remains, however, any adverse effect could be reduced through the implementation of an appropriate scheme of archaeological mitigation, in accordance with national and local planning policy. Given the above, it is considered that the proposed development complies with Core Strategy Policies SS6.

Biodiversity/Ecology

- 4.39 Aspect Ecology has undertaken an Extended Phase I Habitat Survey and a number of protected species surveys, all of which are addressed in the Ecological Appraisal that accompanies this application.
- 4.40 The available information confirms that no statutory or non-statutory nature conservation designations are present within the site, and no significant adverse effects on any designations within the site surrounds are anticipated.

- 4.41 The Phase 1 habitat survey and update survey have established that the site is dominated by habitats of low ecological value and the proposals have sought to retain the features of elevated value. Where it has not been practicable to avoid loss of habitats, new habitat creation has been proposed to compensate losses, in conjunction with the landscape proposals.
- 4.42 The habitats within the site offer opportunities for common and widespread faunal species, including roosting bats, Hedgehog and nesting birds (with Priority species House Sparrow recorded within the site). Therefore, a number of mitigation measures have been proposed to minimise the risk of harm to these and any other notable species that could be present or colonise from the local area.
- 4.43 In conclusion, the proposals have sought to minimise impacts and subject to the implementation of appropriate avoidance, mitigation and compensation measures, it is considered unlikely that the proposals will result in significant harm to biodiversity. Given the above, it is considered that the proposed development complies with Core Strategy Policies SS6 and LD2.

Design

- 4.44 The submitted Design and Access Statement, prepared by CSA Environmental, has examined the proposals in the context of the site surroundings to ensure an appropriate design response.
- 4.45 A baseline site analysis has been undertaken by a thorough assessment of the site and surroundings, pre-application discussions and a number of opportunities and influences. These are set out in full in the DAS but include, amongst others:
- Provision of high quality sustainable housing with associated green infrastructure;
 - An improved vehicular access point from the A4103 Roman Road;
 - Provision of a strong landscape framework based upon the retention of the majority of the existing trees and hedgerows along the site boundaries and the planting of new structural vegetation, to provide landscaping and biodiversity enhancements;
 - Provision of new public open space, including a new children's play and informal recreation;
 - Provision of new SuDS features;
 - Creation of a locally distinctive development;
 - Opportunities for footway improvements;
 - Retention of existing trees and hedgerows wherever possible;
 - Respecting the privacy and amenity of existing houses; and
 - Retention of areas of ecological value and/or appropriate mitigation.

- 4.46 The above leads to a Vision, which follows a placemaking approach, and the delivery of an Illustrative Masterplan (included in Appendix 1) which is informed by the above principles, the technical studies that have been undertaken and the extensive public engagement programme. The developable area has therefore been identified as being approx. 3.89ha with approx. 1.2ha of green infrastructure.
- 4.47 All of the above results in a proposed Illustrative Masterplan that can accommodate approx. 136 family and starter homes, including 35% affordable homes, at a net density of 35 dwellings per hectare. Given the above, it is considered that the proposed development complies with the NPPF and Core Strategy Policies SS6, SS7, H3, OS1, OS2, MT1, LD1, LD2 LD3, and SD1.

Other matters

- 4.48 As well as the above study information, it is intended that the planning application will be accompanied by a Flood Risk and Drainage Assessment (Vectos); Arboricultural Impact Assessment (Aspect Arboricultural); Geotechnical and Geo-Environmental Reports (Terra Firma), and Noise Assessment (RSK).
- 4.49 The Statement of Community Consultation details the public consultation process which has been undertaken prior to the submission of this application, this included the pre application advice received from the Council (18th October 2017, following a meeting on the 4th October 2017) and the public consultation event held on the 12th October 2017 and a presentation to Holmer and Shelwick Parish Council (13th November 2017), as well as setting out the comments raised during the consultation period and detailing how these have been taken into consideration in finalising the planning application.

Planning Obligations

- 4.50 Responses to pre-application advice sought with the Authority (HCC Ref. 172975/CE) confirmed the 35% affordable housing provision would be required, and the likely level of planning obligations which would be sought, including site play provision and off site leisure contributions; and contributions to education facilities to meet an established formula subject to the final housing mix.
- 4.51 It is proposed that the final detail of any planning obligations will be discussed and agreed with officers during the course of the determination of the planning application and will be secured via a Section 106 Agreement. Given the above, it is considered that the proposed development will comply with Core Strategy Policies H1 and ID1.

Conclusion

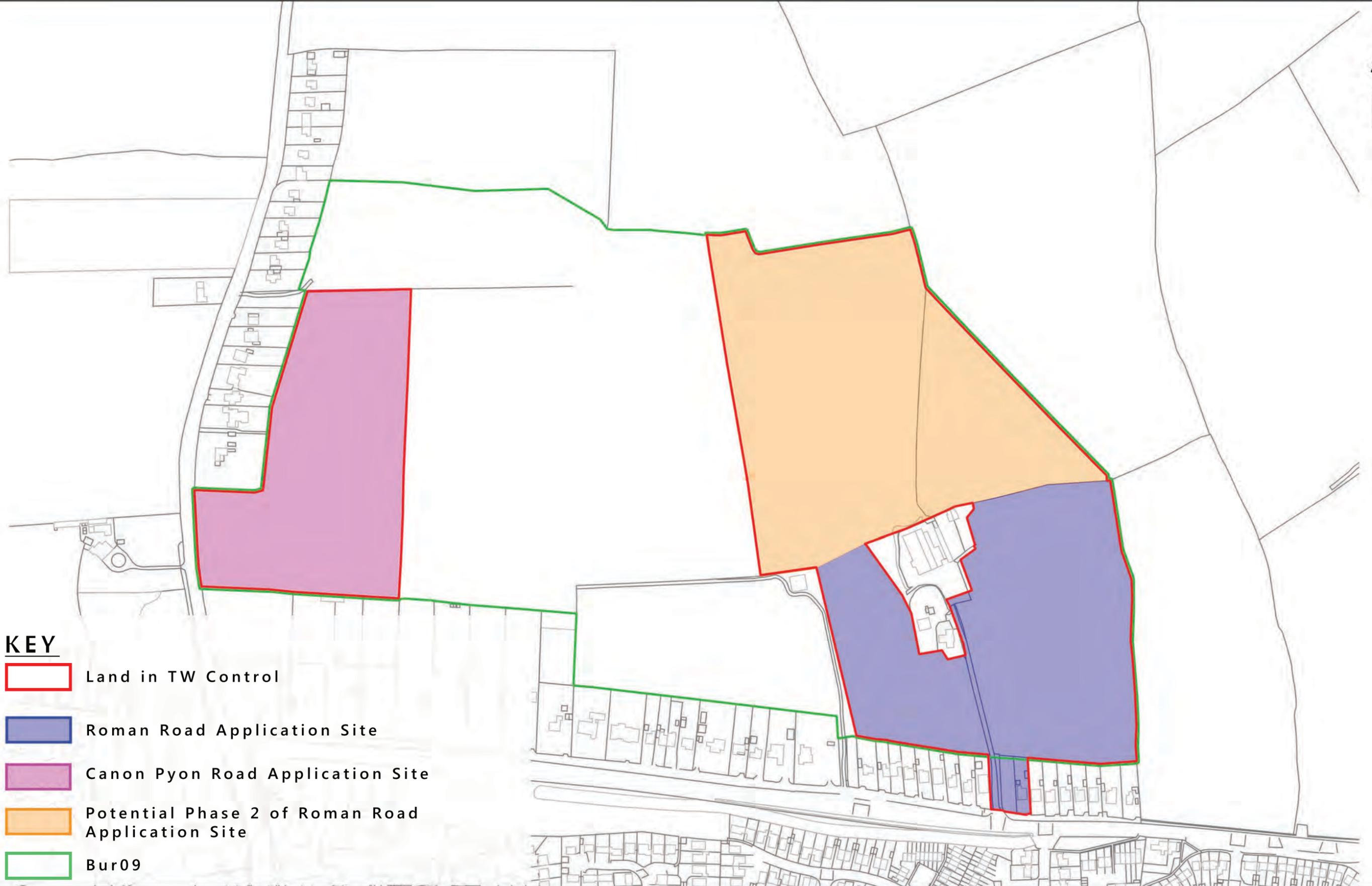
- 5.1 This Statement has been prepared on behalf of Taylor Wimpey plc to respond to the Housing and Employment Site Options Consultation and elaborate on the accompanying forms, with regard to land at Cot Barn Farm, North of Roman Road (Bur09), but with a particular emphasis on the eastern part, known as Land off Roman Road.
- 5.2 As set out in the introduction to this report, Taylor Wimpey has an option on the land outlined red on the Site Location Plan attached at **Appendix 1**. This land is contained within part of the Bur09 allocation.
- 5.3 Work is currently underway with a view to submitting an outline planning application for the construction of up to 136 homes (with all matters reserved except for access), to include public open space, landscaping and associated infrastructure works and demolition of bungalow known as Cotswold. This proposed outline planning application area is identified in blue on the plan in **Appendix 1** and is known as Land off Roman Road. Consequently, land to the north under the same option as the planning application, but outside the scope of the advanced draft planning application, forms part of these representations but is not subject to the detailed technical studies that have been undertaken for the application site. This land is identified in orange in **Appendix 1**.
- 5.4 Taylor Wimpey also has an option on land in the western part of Bur09, known as Land at Canon Pyon Road. This is identified in pink on the plan in **Appendix 1**. Land at Canon Pyon Road is also subject to an advanced draft planning application but is subject to separate representations to the HAP.
- 5.5 Finally, the Illustrative Masterplans produced for the two planning applications above demonstrate that access can be achieved from each site into the land in between the two options controlled by Taylor Wimpey identified in **Appendix 1**, which is controlled by a third party. Consequently, it is not appropriate to make detailed representations on this element within this report. Notwithstanding, Taylor Wimpey supports the allocation of this part of Bur09 should its delivery contribute to a more comprehensive and more appropriate scheme overall as the whole of Bur09 can come forward as separate entities, but cognisant of each other, or as a comprehensive development.
- 5.6 Reference is made throughout these representations to the outline planning application which is being prepared on the south-eastern part of the overall area (5.1 hectares, identified in blue in **Appendix 1**) for the construction of up to 136 homes (with all matters reserved except for

access), to include public open space, landscaping and associated infrastructure works and the demolition of the bungalow known as Cotswold.

- 5.7 An Illustrative Masterplan is appended to the submission and which has been informed by the technical studies and the prevailing characteristics of the site and surroundings. Concerns are consequently expressed regarding the number of units – 435 to 500 – identified in the consultation documents for the whole of Bur09. This is expressed in the context of Question 1 of the accompanying questionnaire.
- 5.8 Further, concern is expressed that the current proposed allocation does not identify an access onto the A4103 Roman Road, which is identified as a requirement in the consultation document.
- 5.9 With regard to Question 3 the site is considered to be **deliverable** in accordance with the provisions of NPPF in that the site is **available, suitable** and **achievable**. As such the proposed development can make a valuable contribution to the Council's 5 housing land supply, as well as providing up to 35% affordable housing.
- 5.10 With reference to 6.4 hectare land parcel immediately north of the application site that lies within Bur09 and Taylor Wimpey's control, that site is also considered to be **available** and **suitable** in accordance with the NPPF. In theory, it is also **achievable**, thus making the remainder of this part Bur09 **deliverable**, but it is acknowledged that a more realistic timetable for delivery of this 6.4 hectare parcel would be in the medium term within the Plan period.
- 5.11 With reference to the supporting evidence prepared, and referred to in the context of Question 8, it is concluded that the proposal is acceptable in relation to national guidance and the development plan and there are no material considerations which should prevent the site from being considered in the light of the relevant planning policy framework. It is therefore respectfully requested that Herefordshire County Council consider these representations in the light of a future non- strategic housing land allocation in the Hereford Area Plan.

Appendix 1

Hereford Area Plan Site Location Plan



KEY

-  Land in TW Control
-  Roman Road Application Site
-  Canon Pyon Road Application Site
-  Potential Phase 2 of Roman Road Application Site
-  Bur09

Drawing Title Hereford Area Plan Site Location Plans	Client Taylor Wimpey	 Unit 9 Oak Tree Court Mulberry Drive Cardiff Gate Business Park Cardiff CF23 8RS T 029 2073 2652	Scale: NTS					
	Job Title Roman Road & Canon Pyon Road		Designed by: GJ					
			Drawn by: GJ					
			Ckd/Appd: PS	Rev.	Date.	Amendment.	Des.	Drn.
			1st Issued: Oct 2018	Drg No:			Rev	
			Job No: 17.175/176				A	

Appendix 2

Illustrative Masterplan



Pocket greens will break up the streetscene and aid legibility through the development

New trees and hedgerows in the rear gardens of the proposed dwellings will respect the amenity and privacy of the adjoining homes

Opportunity to reinforce boundary vegetation to create a landscaped edge

Proposed cut-off drain

ROMAN ROAD

Proposed vehicular access point Roman Road

Proposed children's play area

Previously submitted planning application (P171877/XA2) for approval of details reserved by condition

A4103

-  Site Boundary: 5.10ha
-  Proposed residential development
-  Proposed vehicular access point
-  Proposed recreational route
-  Existing vegetation
-  Proposed location for children's play area
-  Potential attenuation basin
-  Potential tree and hedgerow planting

Based upon the Ordnance Survey map with the permission of the Controller of Her Majesty's Stationary Officer, Crown Copyright reserved. Licence Number AR 100031731

Rev	Date	By	Description

CSA
environmental

Dixies Barns, High Street,
Ashwell, Hertfordshire SG7 5NT

T 01462 743647
E ashwell@csaenvironmental.co.uk
W csaenvironmental.co.uk

Project Roman Road East, Hereford

Drawing Title Illustrative Masterplan

Client Taylor Wimpey UK Ltd

Scale @ A1 1:1000 Drawing No. CSA/3338/107

Date April 2018 Rev -

Drawn BRY Checked RR

Hereford Area Plan (HAP)

Housing and
Employment Site
Options
Consultation

Land East of Canon
Pyon Road,
Hereford

(Part of Bur 09)



Contents

Section 1

Introduction

Section 2

Site description and background

Section 3

Planning Policy Context

Section 4

Detailed Response to Questions 1, 3 and 8

Section 5

Conclusion

Appendix 1 – Site Location Plan

Appendix 2 - Illustrative Masterplan

Introduction

- 1.1 Asbri Planning Ltd. has been instructed by Taylor Wimpey to respond to the current Hereford Area Plan (HAP) Housing and Employment Site Options Consultation in respect of land at Cot Barn Farm, Roman Road, Hereford (Bur09).
- 1.2 Taylor Wimpey has an option on the land outlined red on the Site Location Plan attached at **Appendix 1**. This land is contained within part of the Bur09 allocation.
- 1.3 Work is currently underway with a view to submitting an outline planning application for the construction of up to 90 homes (with all matters reserved except for access), to include public open space, landscaping and associated infrastructure works. This proposed outline planning application area is identified in pink on the plan in **Appendix 1** and is known as Land off Canon Pyon Road.
- 1.4 Taylor Wimpey also has an option on land in the eastern part of Bur09, known as Land off Roman Road. This is identified in blue and orange on the plan in **Appendix 1**. The southern part of Land off Roman Road is also subject to an advanced draft planning application but is subject to separate representations to the HAP. 6.4 hectares of land immediately north of the Roman Road application site, within Bur09 and within the control of Taylor Wimpey and not within the Roman Road application, is also promoted through the representations specific to the Roman Road site.
- 1.5 Finally, the Illustrative Masterplans produced for the two planning applications above demonstrate that access can be achieved from each site into the land in between the two options controlled by Taylor Wimpey identified in **Appendix 1**, which is controlled by a third party. Consequently, it is not appropriate to make detailed representations on this element within this report. Notwithstanding, Taylor Wimpey supports the allocation of this part of Bur09 should its delivery contribute to a more comprehensive and more appropriate scheme overall as the whole of Bur09 can come forward as separate entities, but cognisant of each other, or as a comprehensive development.
- 1.6 Taylor Wimpey plc therefore welcomes the identification of the wider area of land Bur 09, as being considered as suitable for development in the plan period, with the two planning application sites being deliverable in the short term (0-5 years).
- 1.7 This submission accompanies the consultation questionnaire and provides further information based on technical studies prepared to support the Land off Canon Pyon Road planning application area. The studies are summarised but can be made available on request. In this context Questions 1, 3 and 8 on the forms are of particular relevance, and are addressed accordingly. As the planning application does not

cover all of Bur09 (indeed Taylor Wimpey does not control the whole of Bur09) there are no technical studies to rely on for these areas but the questions in relation to these areas have still been completed as far as is practicable.

- 1.8 This supporting statement briefly describes the site and the background to current proposals in Section 2; Section 3 appraises the site within the context of planning policy; Section 4 elaborates on Questions 1, 3 and 8 of the submitted forms; whilst Section 5 concludes the Statement.

Site Description and Background

2.1 The land east of Canon Pyon Road which is the subject of an advanced draft planning application consists of a single field parcel and measures approx. 3.7 hectares. For completeness, the land to the north of Roman Road which is the subject of another advanced draft planning application consists of two field parcels amounting to approx. 5.1 hectares in area. The additional land immediately north of that site comprises two further field parcels amounting approx. 6.4 hectares in area. Taylor Wimpey therefore controls approx. 15.2ha of the wider 29.15ha proposed allocation, on the eastern and western ends of the proposed allocation.

2.2 The individual land parcels are described in more detail below.

Bur09 – The Canon Pyon Road application site

2.3 Land east of Canon Pyon Road consists of a single field parcel amounting to 3.68 hectares in area which fronts onto the A4110 Canon Pyon Road and extends to the rear of dwellings fronting that road to the north. To the south the site is bounded by the rear of properties along the A4103 Roman Road, with open fields to the east and north.

2.4 The northern part of the site falls roughly north west to south east from approx. 89m AOD to 83m AOD, whilst the southern part of the site falls more north to south, then east to west from approx. 83m AOD to approx. 80m AOD.

2.5 The application proposes an access directly onto the A4110 to serve the development. Access is not a reserved matter therefore full details are submitted in the planning application.

2.6 The planning application site, along with further land to the east, at Cot Barn Farm (also known as Roman Road and which is subject to a separate HAP submission), was promoted as a potential western extension to the Core Strategy strategic site at Holmer West (SHLAA site ref. O/Her/001 and HLAA/076.00). This wider promotion was on behalf of a number of landowners and Taylor Wimpey does not have an interest in all of the fields contained in the wider promoted site.

2.7 This wider site was further promoted through the Hereford Area Plan Issues and Options exercise and associated Call for Sites in May 2016, as a potential non-strategic allocation.

2.8 A Pre-Application meeting was held with officers in relation to the proposed development on 4th October 2017 (Ref: 173072/CE).

Bur09 – Land off Roman Road application site and land north of the Roman Road application site

- 2.9 This site, which is separated in two for the purposes of the representations as the southern portion is subject to an advanced draft planning application and the northern portion is not, is subject to separate representations and is therefore not addressed further here.

Planning Policy Context

Introduction

- 3.1 The starting point in considering development at the location proposed is the statutory development plan which consists of the Herefordshire Council Local Plan Core Strategy (adopted October 2015). In addition to the above, other key material considerations include the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG), the saved policies of the Unitary Development Plan (UDP), Herefordshire Council Supplementary Planning Guidance (SPG), the emerging Hereford Area Plan, the Hereford Transport Strategy and the Herefordshire Infrastructure Delivery Plan. These are dealt with accordingly below.

National Planning Policy Framework (NPPF)

- 3.2 The latest National Planning Policy Framework (NPPF) was published on the 24th July 2018. It constitutes guidance for Local Planning Authorities (LPAs) and decision-takers and sets out the Government's planning policies for England and how these are expected to be applied.
- 3.3 The NPPF acknowledges that the planning system is plan-led and therefore the starting point for decision making, as required by planning law, is for planning applications to be determined in accordance with the development plan unless other material considerations indicate otherwise. It goes on to identify that the NPPF must be taken into account when preparing the development plan and that it is a material consideration in determining applications.

Achieving sustainable development

- 3.4 Paragraph 8 of the NPPF continues to state that achieving sustainable development means that the planning system has three overarching objectives – economic, social and environmental.
- 3.5 At the heart of the NPPF is a presumption in favour of sustainable development as set out in paragraph 11. In terms of decision taking this means:

"c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and*

demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

Evidence Base

- 3.6 It is stated at paragraph 31 that Local Plans should be underpinned by relevant and up to date evidence. This should be justified by relevant and up to date evidence which is focused tightly on supporting and justifying the policies concerned, taking into account relevant market signals.

Delivering a sufficient supply of homes

- 3.7 Paragraph 59 states that *"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."*

Planning for housing

- 3.8 Paragraphs 67 & 68 show what is expected of local authorities when planning for housing:

"Planning policies should:

- *Identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.*
- *Identify a supply of specific deliverable sites for years one to five and specific developable sites or broad locations for growth over a 15 year time period.*
- *Identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare unless there are strong reasons why it cannot be achieved".*
- *Support the development of windfall sites through their policies and decisions*
- *Work with developers to encourage the subdivision of large sites where this could help to speed up the delivery of homes.*

Maintaining supply and delivery

- 3.9 Paragraph 73 states that *'Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. '*

- 3.10 Paragraph 73 also states that the supply of specific deliverable sites should include a buffer of 5% (to ensure competition in the market),

- 10% (where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan), or 20% (where there has been significant under delivery of housing over the previous three years).
- 3.11 Paragraph 74 states that a five year supply of deliverable housing sites can be demonstrated where it has been established in a recently adopted plan or in a subsequent annual position statement.
- 3.12 Paragraph 49 of the March 2012 NPPF stated that "*relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites*". This provision still applies, but has been relocated to paragraph 11 and its accompanying footnote.
- Achieving well-designed places**
- 3.13 Paragraph 124 states that "*The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.*"
- 3.14 Paragraph 127 takes this further and sets out more detailed guidance.
- 3.15 Finally on this aspect, paragraph 128 states that "*Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests.*"

Planning Practice Guidance

- Design**
- 3.16 This guidance note, which wasn't updated in July 2018, reinforces the view of the NPPF, highlighting that good quality design is an integral part of sustainable development, and states that good design responds in a practical and creative way to both the function and identity of a place. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations which should:
- *ensure that development can deliver a wide range of planning objectives;*
 - *enhance the quality of buildings and spaces; and*
 - *address the need for different uses sympathetically.*

Housing and economic development needs assessments

3.17 In accordance with the NPPF, this guidance supports LPAs in objectively assessing and evidencing development needs for housing (both market and affordable) which includes the Strategic Housing Market Assessment. In the context of this guidance, the need for housing refers to the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period which should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand.

Herefordshire Local Plan Core Strategy

3.18 The Core Strategy is a key policy document that forms part of the Local Plan for Herefordshire and is used in the determination of all planning applications submitted to the Council alongside saved policies contained in the Unitary Development Plan, discussed below. The Core Strategy was adopted by the Council on 16th October 2015 and puts in place a strategic planning framework to guide change and development in the County over the period 2011-31.

3.19 The site is not included as part of a strategic release in the adopted Core Strategy, and is not identified for development in the UDP. It is, however, being promoted as a non-strategic site through the Hereford Area Plan.

3.20 Policy SS2 of the Core Strategy Local Plan identifies the housing requirement over the Plan period 2011-2031 of 16,500 homes, with 6,500 to be delivered within Hereford. It must be noted that both these figures of 6,500 and 16,500 are *minimum* targets. For the purposes of Policy SS2 this site lies immediately adjacent to the city boundary and therefore within the Hereford Area Plan Boundary. Consequently, it can contribute to the minimum requirement of 6,500 homes for Hereford as set out in Policy SS2 and the wider minimum requirement of 16,500 homes over the Plan period.

3.21 The following Core Strategy policies are considered to be most applicable to the sites (both the application site and the rest of the land within Bur09):

Policy	Title
Vision, Objectives and Spatial Strategy	
SS1	Presumption in favour of sustainable development
SS2	Delivering new homes
SS3	Releasing land for residential development
SS4	Movement and transportation
SS6	Environmental quality and local distinctiveness
SS7	Addressing climate change
Place Shaping Policies	
HD1	Hereford

HD3	Hereford movement
General Policies	
H1	Affordable housing - thresholds and targets
H3	Ensuring an appropriate range and mix of housing
OS1	Requirement for open space, sport and recreation facilities
OS2	Meeting open space, sport and recreation needs
MT1	Traffic management, highway safety and promoting active travel
Environmental Quality	
LD1	Landscape and townscape
LD2	Biodiversity and geodiversity
LD3	Green infrastructure
SD1	Sustainable design and energy efficiency
Delivery, Implementation and Monitoring	
ID1	Infrastructure delivery

Other Material Considerations

- 3.22 **The Hereford Area Plan** will set out the detailed proposals to ensure the full delivery of the city specific policies in the Core Strategy.
- 3.23 **The Hereford Transport Strategy** includes a programme of infrastructure and services to facilitate growth proposals including:
- real time information on core bus network and stop upgrades;
 - active travel network;
 - extension of Destination Hereford project;
 - Hereford transport hub;
 - city centre refurbishments;
 - bus priority measures;
 - rail track and signal improvements between Hereford and Malvern; and
 - facilities to support electric and low carbon vehicles.
- 3.24 Particular transport infrastructure necessary to bring forward the Core Strategy proposals is detailed in the **Infrastructure Delivery Plan**.

Detailed Response to Questions 1, 3 and 8

Question 1 – Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

- 4.1 It is agreed that Site Bur09 – Land at Cot Barn Farm, Roman Road should be identified as having potential for residential development. In this submission emphasis is placed on the westernmost field parcel of the site which is subject to ongoing work on a planning application, scheduled to be submitted in the near future, given that there are more technical studies available for this part of Bur09 and given that it is considered that it could be delivered in the short term (0-5 years). This planning application site is also known as Land off Canon Pyon Road. Details in relation to land outside the Canon Pyon application site (i.e. the remainder of Bur09 that is within Taylor Wimpey's control) are referred to as appropriate.
- 4.2 Whilst there is broad agreement to the allocation of Bur09 as a whole, Taylor Wimpey have concerns in relation to the indicative housing figure given for the whole of Bur 09 as it shows a potential capacity of 435 dwellings.
- 4.3 The Land off Canon Pyon Road application will seek outline planning permission for the proposed construction of up to 90 no. homes and associated access, a locally equipped area of play (LEAP), landscaping and associated infrastructure. This equates to a density of approx. 35 dph. Access is to be considered in the application with all other matters reserved. The proposal entails the formation of a new vehicular access point onto Canon Pyon Road, which is proposed as a simple priority junction.
- 4.4 In accordance with Herefordshire Council's standards for affordable housing provision in the Core Strategy, it is anticipated that 35% of the dwellings will be affordable homes.
- 4.5 Though the internal access arrangement would be approved at reserved matters stage, the submitted Illustrative Masterplan, included as **Appendix 2** of this submission, demonstrates how 90 homes could be delivered on site and therefore the internal highway network is likely to be similar to that shown in the Illustrative Masterplan. The Illustrative Masterplan also demonstrates how the remainder of Bur09 could be accessed through the proposed planning application site to the north and west.

- 4.6 Whilst the current proposals are only focused on the 3.7 hectares subject to the planning application being progressed, the above (along with the Land off Roman Road Illustrative Masterplan (addressed in those representations)) demonstrates that the potential capacity for the whole of Bur09 is capable of delivering far in excess of the 435 dwellings referred to in the consultation documentation. It is noted in the Technical Site Assessment that this could be extended to 500 dwellings if the issues highlighted in the assessment were addressed. However, this would still result in an inefficient use of land.
- 4.7 The net developable area of the Land off Canon Pyon Road site has been established through the planning application process as 2.53 hectares with some 1.2 hectares given over to green infrastructure. Consequently this net area amounts to 68.75% of the total area, with a resulting density of 35 dwellings per hectare. If this were applied to the whole 29.15 hectares it would result in some 20 hectares being developable. Applying a density of 35 per hectare would result in a capacity of some 700 dwellings. A similar calculation has been applied to the Land off Roman Road site where a higher percentage of developable area (76.5%) has been identified. If this were applied to the whole Bur09 site, it could accommodate 770 dwellings. If, on the other hand, a density is applied as per paragraph 5.24 of the consultation document which reflects the 30 dwellings per hectare on sites on the fringes of the urban area, a total of 600 dwellings could be potentially accommodated.
- 4.8 Whilst it is acknowledged that the above net developable areas and densities are a crude high level analysis for the whole of Bur09, the technical studies undertaken for the two application sites demonstrate that approx. 225 homes can be delivered comfortably across 8.8ha of the wider Bur09 allocation.
- 4.9 It can therefore be concluded that, while appearance, landscape, layout and scale are reserved matters, the application preparation to date demonstrates how up to 90 homes could be delivered on site with a varied mix of starter and family homes, including including 35% affordable homes. Given the above, it is considered that the proposed development complies with NPPF and Core Strategy Policies SS6, SS7, H3, OS1, OS2, MT1, LD1, LD2 LD3, and SD1
- 4.10 Whilst the current proposals are only focused on the 3.68 hectares subject to the planning application being progressed, the above demonstrates that the potential capacity for the whole of Bur09 is capable of delivering far in excess of the 435 dwellings referred to in the Consultation documentation.

Question 3 – Do you think that any particular sites should be developed in the short, medium or long term?

4.11 The 3.68 hectare site at Canon Pyon Road has been identified principally to contribute to short term housing needs over the immediate 5 year period. It is for this reason that, in spite of the current unallocated status of the site, a planning application is being prepared in the light of a persisting 5 year housing land supply shortfall in Herefordshire, and the provisions of the previous and current versions of the NPPF.

4.12 It is therefore the intention that the planning application be submitted shortly with a view to Taylor Wimpey developing the site over the immediate 5 year period.

4.13 Under the above context, the site meets the definition of *deliverable* under the definition which is retained in the Glossary in Annex 2 of the NPPF which states that:

*“To be considered deliverable, sites for housing should be **available** now, offer a **suitable** location for development now, and be **achievable** with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered **deliverable** until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.” [our emphasis]*

4.14 It therefore falls to assessing the site against the criteria outlined above to demonstrate whether the site is deliverable. The application site comprises vacant land and is under the control of one landowner. The applicant is a national housebuilder. It was promoted through the Core Strategy and is being promoted by the same national housebuilder through the Hereford Area Plan as being ready for development. The site is therefore considered to be **available** now.

4.15 The site lies adjacent to the settlement boundary of Hereford, the Main Urban Area in the settlement hierarchy as identified in the Core Strategy Local Plans, Spatial Strategy Background Paper – January 2010. Hereford needs to deliver a minimum of 6,500 homes over the Core Strategy Plan Period 2011-2031, with 1,000 to 1,500 homes yet to be identified, which will be delivered through the Hereford Area Plan 2011-2031. The site is not subject to any specific designations

where development should be restricted, therefore the site is considered to be a **suitable** location for development now.

- 4.16 The technical studies that have been prepared in order to accompany the planning application demonstrate that there are no known constraints which would prevent development commencing, and being completed or substantially, within the next 5 years. This is supported by the fact that the site has the involvement of a national house builder. There is therefore a realistic prospect that housing will be delivered on the site within five years therefore the site is considered to be **achievable**.
- 4.17 Consequently, the site meets the tests set out in the NPPF and the glossary and as such the proposed development is considered to be **deliverable**.
- 4.18 In conclusion, the release of the application site would represent a development which is deliverable in the short term (i.e. within the next 5 years monitoring period) and can provide a significant contribution to improving the current 5 year housing land supply shortfall.

Question 8 – Do you have any comments on the document and the approach used to identify potential sites?

- 4.19 Under the above question reference is made to the Technical Site Assessments which have informed the site assessment schedule in the main consultation document. In this instance the assessment for Bur09 is specifically referred to on Page 50 of the Consultation Paper.
- 4.20 It is acknowledged that the document recognises in Paragraph 4.3 that the site assessment is an iterative process and that more information on sites may be added on to the assessment after the consultation has taken place. This will be in line with NPPF Paragraph 31 which emphasises that plans should be supported by adequate and up to date evidence.
- 4.21 With reference to the technical studies prepared to accompany the emerging planning application comments are provided on the key issues highlighted in the Technical Site Assessments under the appropriate headings below. The whole of the documents referred to can be made available, if necessary, on request. Technical information in relation to the Land off Roman Road element of Bur09 is contained within the representations on that site.

Highways and Transport

Access to Alternative Modes of Transport

- 4.22 A Transport Assessment has been undertaken by Asbri Transport Ltd. A new access is proposed onto Canon Pyon Road, which will be in the form of a simple priority junction; 2m wide footways either side of the 10m bell-mouth radii are proposed. Though the internal access arrangement would be fully considered at reserved matters stage, the submitted Illustrative Masterplan demonstrates how 90 homes could be delivered on site and therefore the internal highway network is likely to be similar to that shown in the Illustrative Masterplan, which shows an irregular cul-de-sac pattern with mews link interconnections providing 'development permeability'.
- 4.23 The Site is located with good access to public transport and within walking distance of a number of amenities/facilities, reducing the need for private car-borne trips. Footways are to be provided throughout the site and the footpath fronting Canon Pyon Road between the site access and Roman Road will be widened to 2m for its entire length. It can therefore be regarded as being accessible with significant scope for many trips to be made by foot and public transport.
- 4.24 A separate Travel Plan has been prepared, also undertaken by Asbri Transport, which details the approach that Taylor Wimpey will adopt to ensure that all residents of the development site are fully aware of their travel opportunities to promote the use of sustainable transport modes and to reduce the reliance on the private car.
- 4.26 Whilst the TA has been prepared in relation to the Land off Canon Pyon Road application site, because the Land off Roman Road site is also subject to an advanced draft planning application, the TA for the Canon Pyon Road application is cognisant of the proposed development at Roman Road to ensure robustness.

Access

- 4.27 As access is not a reserved matter, full details of the proposed access are contained within the Transport Assessment. Whilst the TA is not submitted with these representations, it can be made available in advance of the planning application on request if necessary.
- 4.28 A simple priority junction off Canon Pyon Road into the application site is proposed and, from a technical highways design perspective, this can accommodate a significant number of additional movements over and above those likely to be generated by the 90 homes envisaged in the planning application. It is acknowledged that wider network capacity matters for the development of the whole of Bur09 would need to be undertaken.

Impact on Local Road Network

- 4.29 With regard to the proposed development's traffic impact on the operation of the local highway network, it is considered the traffic movements associated with the development proposal could be accommodated on the existing highway network and that there will not be a detrimental impact on the free flow of traffic using the local highway network.
- 4.30 The Roman Road site, also part of Bur09, and subject to a separate representation, is also subject to a planning application which, it is anticipated, will likely be submitted on or around the same time as this application. The TA has considered the cumulative impact of both schemes for completeness. The TA concludes that *"A comparison of the no development and with development scenarios indicates that the increase in flows associated with the cumulative development proposals will have a marginal impact on the operation of the junction and the impact of the development could not be considered to be severe."*
- 4.31 Traffic calming in the form of gateway features, electronic speed advisory sign, raised junction table, widening of footway, appropriate signage and possible speed cushions or alternative traffic calming features to be agreed, as well as an extension of the 30mph speed limit to approximately 10m north of the proposed access, will aid in slowing traffic speeds down. Further, the proposed traffic calming enables the centre line of the visibility splay being moved further into the carriageway, providing additional visibility.
- 4.32 It has been clearly demonstrated the development of the site will not adversely impact on the existing highway network so that the residual cumulative impacts of the development are "severe", either on its own or cumulatively with the Roman Road development, and can be safely accessed in accordance with planning policy. Given the above, it is considered that the proposed development complies with Core Strategy Policies SS4, HD3 and MT1.
- 4.33 As mentioned above, further highway network capacity analysis would need to be undertaken in relation to the whole of Bur09.

Landscape and Visual Impact

- 4.34 The Landscape and Visual Impact Assessment (LVIA) has been undertaken by CSA Environmental and considers the effects of the proposed development on both landscape character and views. Again the cumulative impact of this application with Roman Road (the south-eastern part of Bur09) has also been assessed for completeness. The LVIA confirms that the site is not covered by any designations for landscape character or quality.
- 4.35 The LVIA assesses the site's quality, sensitivity and value as medium,

and that the proposed development will be well related to the existing housing to the south and west. It continues by stating that as the proposed development will be well related to the existing built development, as well as the fact that views of the new homes will be limited to those from the near distance, the effects of the proposed development on the surrounding landscape will be limited.

- 4.36 The LVIA concludes by stating that, given the above, the site is capable of accommodating the proposed development in landscape and visual terms without resulting in material landscape or visual harm to the wider landscape/townscape around the site. The same conclusions apply when considering the cumulative impact of this proposed development and the Roman Road scheme. Given the above, it is considered that the proposed development complies with Core Strategy Policies SS6 and LD1

The Built and Historic Environment

- 4.37 Wessex Archaeology was commissioned to prepare a Historic Environment Desk-Based Assessment to assess the known and potential heritage resource within the site and the surrounding area, and to assess the likely impacts of the development proposals on this resource. This study has identified no overriding heritage constraints which are likely to prohibit development.
- 4.38 Within the site the assessment identifies the potential for the presence of buried archaeological remains, however, any adverse effect could be reduced through the implementation of an appropriate scheme of archaeological mitigation, in accordance with national and local planning policy. This can be secured via an appropriately worded planning condition. Given the above, it is considered that the proposed development complies with Core Strategy Policy SS6.

Biodiversity/Ecology

- 4.39 Aspect Ecology has undertaken an Extended Phase I Habitat Survey and a number of protected species surveys, all of which are addressed in the Ecological Appraisal that accompanies this application.
- 4.40 The available information confirms that no statutory or non-statutory nature conservation designations are present within the site, and no significant adverse effects on any designations within the site surrounds are anticipated.
- 4.41 The Phase 1 habitat survey and update survey have established that the site is dominated by habitats of low ecological value and the proposals have sought to retain the features of elevated value. Where it has not been practicable to avoid loss of habitats, new habitat creation has been proposed to compensate losses, in conjunction with the landscape proposals.

- 4.42 The habitats within the site offer opportunities for common and widespread species, including roosting bats, Hedgehog and nesting birds (with Priority species House Sparrow recorded within the site). Therefore, a number of mitigation measures have been proposed to minimise the risk of harm to these and any other notable species that could be present or colonise from the local area.
- 4.43 In conclusion, the proposals have sought to minimise impacts and subject to the implementation of appropriate avoidance, mitigation and compensation measures, it is considered unlikely that the proposals will result in significant harm to biodiversity. Given the above, it is considered that the proposed development complies with Core Strategy Policies SS6 and LD2.

Design

- 4.44 A Design and Access Statement, prepared by CSA Environmental, has examined the proposals in the context of the site surroundings to ensure an appropriate design response.
- 4.45 A baseline site analysis has been undertaken by a thorough assessment of the site and surroundings, pre-application discussions and a number of opportunities and influences. These are set out in full in the DAS but will include, amongst others:
- Provision of high quality sustainable housing with associated green infrastructure;
 - A vehicular access point from the A4110 Canon Pyon Road;
 - Provision of a strong landscape framework based upon the retention of the majority of the existing trees and hedgerows along the site boundaries and the planting of new structural vegetation, to provide landscaping and biodiversity enhancements;
 - Provision of new public open space, including a new children's play and informal recreation;
 - Provision of new SuDS features;
 - Creation of a locally distinctive development;
 - Opportunities for footway improvements;
 - Retention of existing trees and hedgerows wherever possible;
 - Respecting the privacy and amenity of existing houses;
 - Retention of areas of ecological value and/or appropriate mitigation;
 - Addressing the Dwr Cymru Welsh Water (DCWW) water main and its associated easement that runs along the southern and eastern boundaries; and
 - Consideration towards undergrounding the electricity line that passes across the site.

- 4.46 The above leads to a Vision, which follows a place making approach, and the delivery of an Illustrative Masterplan which is informed by the above principles, the technical studies that have been undertaken and the extensive public engagement programme. The developable area has therefore been identified as being approx. 2.53ha with approx. 1.1ha of green infrastructure.
- 4.47 As well as the above study information, it is intended that the planning application will be accompanied by a Flood Risk Assessment (Vectos); Arboricultural Impact Assessment (Aspect Arboricultural); Geotechnical and Geo-Environmental Reports (Terra Firma).
- 4.48 A Statement of Community Consultation details the public consultation process which has been undertaken prior to the submission of this application, this included the pre application advice received from the Council (18th October 2017, following a meeting on the 4th October 2017) and the public consultation event held on the 12th October 2017 and a presentation to Holmer and Shelwick Parish Council (13th November 2017), as well as setting out the comments raised during the consultation period and detailing how these have been taken into consideration in finalising the planning application.

Planning Obligations

- 4.49 Responses to pre-application advice sought with the Authority (HCC Ref. 173072/CE) confirmed the 35% affordable housing provision would be required, and the likely level of planning obligations which would be sought, including site play provision and off site leisure contributions; and contributions to education facilities to meet an established formula subject to the final housing mix.
- 4.50 It is proposed that the final detail of any planning obligations will be discussed and agreed with officers during the course of the determination of the planning application and will be secured via a Section 106 Agreement. Given the above, it is considered that the proposed development will comply with Core Strategy Policies H1 and ID1.

Conclusion

- 5.1 This Statement has been prepared on behalf of Taylor Wimpey plc to respond to the Housing and Employment Site Options Consultation and elaborate on the accompanying forms, with regard to land at Cot Barn Farm, North of Roman Road (Bur09), but with a particular emphasis on the western part, known as Land off Canon Pyon Road.
- 5.2 As set out in the introduction to this report, Taylor Wimpey has an option on the land outlined red on the Site Location Plan attached at **Appendix 1**. This land is contained within part of the Bur09 allocation.
- 5.3 Work is currently underway with a view to submitting an outline planning application for the construction of up to 90 homes (with all matters reserved except for access), to include public open space, landscaping and associated infrastructure works. This proposed outline planning application area is identified in pink on the plan in **Appendix 1** and is known as Land off Canon Pyon Road.
- 5.4 Taylor Wimpey also has an option on land in the eastern part of Bur09, known as Land off Roman Road. This is identified in blue and orange on the plan in **Appendix 1**. Land off Roman Road is also subject to an advanced draft planning application but is subject to separate representations to the HAP. 6.4 hectares of land immediately north of the Roman Road application site, within Bur09 and within the control of Taylor Wimpey and not within the Roman Road application, is also promoted through the representations specific to the Roman Road site.
- 5.5 Finally, the Illustrative Masterplans produced for the two planning applications above demonstrate that access can be achieved from each site into the land in between the two options controlled by Taylor Wimpey identified in **Appendix 1**, which is controlled by a third party. Consequently, it is not appropriate to make detailed representations on this element within this report. Notwithstanding, Taylor Wimpey supports the allocation of this part of Bur09 should its delivery contribute to a more comprehensive and more appropriate scheme overall as the whole of Bur09 can come forward as separate entities, but cognisant of each other, or as a comprehensive development.
- 5.6 Reference is made throughout these representations to the outline planning application which is being prepared on the western part of the overall area (3.7 hectares, identified in pink in **Appendix 1**) for the construction of up to 90 homes (with all matters reserved except for access), to include public open space, landscaping and associated infrastructure works.
- 5.7 An Illustrative Masterplan is appended to the submission and which has been informed by the technical studies and the prevailing characteristics of the site and surroundings. Concerns are consequently expressed regarding the number of units – 435 to 500 – identified in the

consultation documents for the whole of Bur09. This is expressed in the context of Question 1 of the accompanying questionnaire.

- 5.8 Further, concern is expressed that the current proposed allocation does not identify an access onto the A4103 Roman Road, which is identified as a requirement in the consultation document, although this is not necessarily directly applicable to the Land off Canon Pyon Road element insofar as it relates to the current draft planning application.
- 5.9 With regard to Question 3 the site is considered to be **deliverable** in accordance with the provisions of NPPF in that the site is **available, suitable** and **achievable**. As such the proposed development can make a valuable contribution to the Council's 5 housing land supply, as well as providing up to 35% affordable housing.
- 5.10 With reference to the supporting evidence prepared, and referred to in the context of Question 8, it is concluded that the proposal is acceptable in relation to national guidance and the development plan and there are no material considerations which should prevent the site from being considered in the light of the relevant planning policy framework. It is therefore respectfully requested that Herefordshire County Council consider these representations in the light of a future non- strategic housing land allocation in the Hereford Area Plan.

Appendix 1

Hereford Area Plan Site Location Plan



KEY

-  Land in TW Control
-  Roman Road Application Site
-  Canon Pyon Road Application Site
-  Potential Phase 2 of Roman Road Application Site
-  Bur09

Drawing Title Hereford Area Plan Site Location Plans	Client Taylor Wimpey	 Unit 9 Oak Tree Court Mulberry Drive Cardiff Gate Business Park Cardiff CF23 8RS T 029 2073 2652	Scale: NTS					
	Job Title Roman Road & Canon Pyon Road		Designed by: GJ					
			Drawn by: GJ					
			Ckd/Appd: PS	Rev.	Date.	Amendment.	Des.	Drn.
			1st Issued: Oct 2018	Drg No:			Rev	
			Job No: 17.175/176				A	

Appendix 2

Illustrative Masterplan



0 10 20 metres

-  Site Boundary: 3.68ha
-  Potential residential land: 2.53ha (up to 90 dwellings @ 35dph)
-  Proposed vehicular access point
-  Proposed pedestrian linkage
-  Proposed informal and amenity green space
-  Proposed new recreational route
-  Existing vegetation
-  Proposed new tree and hedgerow planting
-  Proposed location for a Locally Equipped Area for Play (LEAP)
-  Proposed locations for sustainable drainage basins (SuDS features)

New infill and hedgerow planting will create an attractive landscaped edge to the development and increase ecological connectivity around the margins of the Site

New dwellings will overlook new areas of public green space

Proposed tree planting in the rear gardens of the new homes will respect the privacy of the existing dwellings along Canon Pyon Road

CANON PYON ROAD (A41110)

Proposed vehicular access point

Proposed pedestrian linkage and footway improvements along Canon Pyon Road



LEAP

Rev	Date	By	Description
A	20.12.17	AS	Minor amendment

Drawing Status

FOR PLANNING

CSA
environmental

Dixies Barns, High Street,
Ashwell, Hertfordshire SG7 5NT

T 01462 743647
E ashwell@csaenvironmental.co.uk
W csaenvironmental.co.uk

Project Canon Pyon Road, Hereford

Drawing Title Illustrative Masterplan

Client Taylor Wimpey UK Ltd

Scale @ A1 1:500 Drawing No. CSA/3339/109
Date December 2017 Rev A
Drawn SG/JB Checked SG

Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address:
www.herefordshire.gov.uk/herfordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herfordareaplan as well as at libraries and information centres across the county.

**Complete the questions for as many sites as you would like to comment on.
Please include the site reference for any you are making a specific comment on.**

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

If no, please explain:

The identification of site Bur09 as having potential is agreed and supported by Taylor Wimpey.

The whole of the area extends to 29.15 hectares. Reference is made in the Supporting Statement attached to an outline planning application being prepared by Taylor Wimpey for up to 136 dwellings on 5.1 hectares at Cot Barn Farm, North of Roman Road, Hereford. With reference to evidence prepared to date, which has informed an Illustrative Masterplan, this can be achieved taking all factors into account.

If similar densities are applied to the whole of Bur09, a larger number of dwellings would be accommodated on the larger area.

Further, the Site Options consultation document refers to accessing Bur09 off the A4103 Roman Road; the planning application also proposes access off the A4103 Roman Road. However, the proposed allocation in the consultation document does not show a direct access from Bur09 to the A4013 Roman Road. This therefore needs to be addressed in future iterations.

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer:

The 5.1 hectare site at Cot Barn Farm (Part of Bur09) has been identified principally to contribute to short term needs over a 5 year period. It is for this reason that a planning

application is being prepared in the light of a persisting 5 year land supply shortfall. The site is considered to be **available**, **suitable** and **achievable**, and is therefore **deliverable** in accordance with the NPPF.

The 6.4 hectare parcel that lies immediately north of the planning application site and is within the control of Taylor Wimpey and within Bur09 is also considered **available** and **suitable** in accordance with the NPPF. In theory, it is also **achievable**, thus making the remainder of this parcel of Bur09 **deliverable**, but it is acknowledged that a more realistic timetable for delivery would be in the medium term within the Plan period.

The attached Supporting Statement elaborates further.

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

If yes, please supply site details:

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain:

With reference to the technical studies prepared to support the emerging planning application, comments are provided on the key issues highlighted in the Technical Site Assessment. With reference to the remainder of Bur09 that lies outside the area subject to the imminent outline planning application, and therefore not subject to detailed technical studies, comments are addressed at a high level at this stage.

Please refer therefore to the attached Supporting Statement.

(Please use additional box at the back of questionnaire if you need more space to comment)

About you:

Name:...Taylor Wimpey plc

.....

Address:.....c/o Asbri Planning Ltd, Unit 9 Oak Tree Court, Mulberry Drive, Cardiff Gate Business Park, Cardiff CF23 8RS.

.....

.....

Email:... Alex.Anderson@taylorwimpey.com keith@asbriplanning.co.uk

pete@asbriplanning.co.uk

.....

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (FoI) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways:
Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to:
Forward Planning
Herefordshire Council Offices
Plough Lane
Hereford
HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Question 8 continued...

Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address:
www.herefordshire.gov.uk/herfordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herfordareaplan as well as at libraries and information centres across the county.

**Complete the questions for as many sites as you would like to comment on.
Please include the site reference for any you are making a specific comment on.**

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

If no, please explain:

The identification of site Stm05 as having potential is agreed and supported by Taylor Wimpey.

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer:

Given the discrete nature of Stm05 and the fact that it is an infill site and is opposite existing development, this parcel could be delivered in the short term (0-5 years) and is therefore considered **available, suitable** and **achievable**, and therefore **deliverable** in accordance with the NPPF.

The attached Supporting Statement elaborates further.

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

If yes, please supply site details:

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain:

Please refer to the attached Supporting Statement.

(Please use additional box at the back of questionnaire if you need more space to comment)

About you:

Name:... Taylor Wimpey plc

.....

Address:..... c/o Asbri Planning Ltd, Unit 9 Oak Tree Court, Mulberry Drive, Cardiff Gate Business Park, Cardiff CF23 8RS.

.....

.....

Email:... Alex.Anderson@taylorwimpey.com keith@asbriplanning.co.uk

pete@asbriplanning.co.uk

.....

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be

shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (FoI) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways:
Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to:
Forward Planning
Herefordshire Council Offices
Plough Lane
Hereford
HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Question 8 continued...

Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address:
www.herefordshire.gov.uk/herfordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herfordareaplan as well as at libraries and information centres across the county.

**Complete the questions for as many sites as you would like to comment on.
Please include the site reference for any you are making a specific comment on.**

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

If no, please explain:

The identification of site Hol13 as having potential is agreed and supported by Taylor Wimpey.

Nevertheless concerns are expressed regarding the number of dwellings stated - 155 for the whole site which extends to 34.58 hectares.

Reference is made in the Planning Statement attached to a planning application being prepared by Taylor Wimpey for up to 250 dwellings on 11.2 hectares. These references are summarised in these representations. With reference to the Masterplan options produced in relation to the above outline planning application, they demonstrate that up to 250 dwellings can be accommodated on the 11.2 hectare portion of Hol13.

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer:

The 11.2 hectare site at Grafton Lane (Part of Hol13) has been identified principally to contribute to short term needs over a 5 year period. It is for this reason that a planning application is being prepared in the light of a persisting 5 year land supply shortfall. The site is considered to be **available, suitable and achievable**, and is therefore **deliverable** in accordance with the NPPF.

The remainder of Hol13 that lies within the control of Taylor Wimpey is also considered **available** and **suitable** in accordance with the NPPF. In theory, it is also **achievable**, thus making the remainder of Hol13 **deliverable**, but it is acknowledged that a more realistic timetable for delivery would be in the medium to long term within the Plan period.

The attached Supporting Statement elaborates further.

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

If yes, please supply site details:

About you:

Name:...Taylor Wimpey plc

.....

Address:.....c/o Asbri Planning Ltd, Unit 9 Oak Tree Court, Mulberry Drive, Cardiff Gate Business Park, Cardiff CF23 8RS.

.....

.....

Email:... Alex.Anderson@taylorwimpey.com keith@asbriplanning.co.uk

pete@asbriplanning.co.uk

.....

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (Fol) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways:

Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to:

Forward Planning

Herefordshire Council Offices

Plough Lane

Hereford

HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Question 8 continued...

Hereford Area Plan (HAP)

Housing and
Employment Site
Options Consultation

Land at Grafton Lane
(Hol13) and
Land opposite Leys
Farm,
Grafton Lane (Stm05)

Contents

Section 1

Introduction

Section 2

Site description and background

Section 3

Planning Policy Context

Section 4

Detailed Response to Questions 1, 3 and 8

Section 5

Conclusion

Appendix 1 – Site Location Plan

Appendix 2 – Draft Illustrative Masterplan

Appendix 3 – Draft Illustrative Masterplan with Community Facility

Introduction

- 1.1 Asbri Planning Ltd. has been instructed by Taylor Wimpey to respond to the current Hereford Area Plan (HAP) Housing and Employment Site Options Consultation in respect of land at Grafton Lane, Hereford (Hol13) and Land opposite Leys Farm, Grafton Lane, Hereford (Stm05).
- 1.2 Taylor Wimpey has an option on the land outlined in red on the Site Location Plan attached at **Appendix 1**. This land is contained within part of the Hol13 allocation and it also includes the whole of the Stm05 allocation. Some of the land identified in the red line lies adjacent to but outside the HAP area (within the Callow and Haywood Parish Group), but it is promoted here for completeness to demonstrate potential future development. This is identified in blue on the plan in **Appendix 1**.
- 1.3 Work is currently underway with a view to submitting an outline planning application with all matters reserved except for access for the proposed development of land to the north and south of Grafton Lane, Hereford. This includes 4 of the fields contained within Hol13. This proposed outline planning application area is identified in pink on the plan in **Appendix 1**. Further, there is land in Taylor Wimpey's control that lies in between the pink land and blue. This is identified in white in **Appendix 1**. The Stm05 land is identified in green on **Appendix 1**.
- 1.4 Finally, part of Hol13 lies outside the control of Taylor Wimpey. Consequently, it is not appropriate to make detailed representations on this element within this report. This is identified in orange on the plan in **Appendix 1**. Notwithstanding, Taylor Wimpey supports the allocation of this part of Hol13 should its delivery contribute to a more comprehensive and more appropriate scheme overall.
- 1.5 Taylor Wimpey plc therefore welcomes the identification of the wider area of land Hol13, as well as Stm05, as being considered as suitable for development in the plan period, with the planning application site element of Hol13 being deliverable in the short term (0-5 years).
- 1.6 This submission accompanies the consultation questionnaire and provides further information based on technical studies prepared to accompany the planning application insofar as it relates to the planning application area within Hol13. In this context Questions 1, 3 and 8 on the forms are of particular relevance, and are addressed accordingly. As the planning application does not cover all of Hol13 or any of Stm05 (indeed Taylor Wimpey does not control the whole of Hol13) there are no technical studies to rely on for these areas but the questions in relation to these areas have still been completed as far as is practicable.
- 1.6 This supporting statement briefly describes the sites and the background to current proposals in Section 2; Section 3 appraises the

sites within the context of planning policy; Section 4 elaborates on Questions 1, 3 and 8 of the submitted forms; whilst Section 5 concludes the Statement.

Site Description and Background

2.1 The land to the north and south of Grafton Lane which is the subject of an imminent planning application consists of four field parcels either side of Grafton Lane amounting to approx. 11.2 hectares in area, as identified in **Appendix 1**. The whole area of land controlled by Taylor Wimpey that lies within Hol13 amounts to approx. 23.3 hectares. The area of land controlled by Taylor Wimpey that lies outside the HAP area amounts to approx. 24.7 hectares. Stm05 measures approx. 2.5 hectares. The whole area of land controlled by Taylor Wimpey in Hol13, Stm05 and outside the HAP boundary therefore amounts to approx. 50.5 hectares.

2.2 The individual land parcels are described in more detail below.

Hol13 – The planning application site

2.3 To the north lies the railway line which connects Hereford with Cardiff in the south and Birmingham in the north. To the east of the site lies the A49 Ross Road and four dwellings on the north side of Grafton Lane; to the south lies the Brandon Lodge hotel, a bus storage depot, a dwelling, small industrial units, a further hardstanding for parking and open fields. Open fields, with a residential property to the north of Grafton Lane, lie to the west.

2.4 The high points of the site lies at approx. 76m Above Ordnance Datum (AOD), in both the eastern and western parts of the site. From these points the land falls to the north towards the railway line to approx. 70m AOD with the low point of the site towards the south at approx. 66m AOD. Internal and external field boundaries are marked by hedgerows interspersed by a small number of trees.

2.5 The planning application site, along with further land to the south and corresponding with Hol13, was promoted as a potential southern extension at the Core Strategy Examination, held in February 2015.

2.6 This site was further promoted through the Hereford Area Plan Issues and Options exercise and associated Call for Sites in May 2016, as a potential non-strategic allocation.

2.7 A Pre-Application meeting was held with officers in relation to the proposed development on the planning application site in November 2017 (Ref: 173494/CE).

Hol13 – The remainder of Hol13

2.8 The remainder of Hol13 that lies within the HAP area comprises 5 agricultural fields and adjoins the above site to the west. It lies

wholly to the south of Grafton Lane and wraps around Leys Farm, extending to the existing development in Grafton to the west and Withy Brook to the south.

- 2.9 The remainder of Hol13 that is outside Taylor Wimpey's control lies to the south and east of this land. This land could be available as a later phase to the 'Phase 1' planning application site above and could be delivered in the medium to long term.

Stm05

- 2.10 This site comprises a discrete land parcel measuring approx. 2.5ha to the north of Grafton Lane, in between existing development in Grafton and a row of 4 large detached properties that separate Stm05 with the planning application site and opposite Leys Farm. Given that it is an infill site that is opposite existing development it is considered that this site could be developed in the short term (0-5 years).

Land outside the HAP area

- 2.11 Further land in the control of Taylor Wimpey but outside the HAP area comprises two fields either side of Withy Brook, and adjoining Grafton Lane to the west. Two small areas of woodland, the larger of which is known as Grafton Wood, lie within this site and would not be proposed to be developed.
- 2.12 Given their location adjoining Hol13 and outside the HAP area it is envisaged that these fields comprise a long term site for future development plans, either an updated Hereford wide Local Plan or an updated Neighbourhood Development Plan.

Planning Policy Context

Introduction

- 3.1 The starting point in considering development at the location proposed is the statutory development plan which consists of the Herefordshire Council Local Plan Core Strategy (adopted October 2015). In addition to the above, other key material considerations include the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG), the saved policies of the Unitary Development Plan (UDP), Herefordshire Council Supplementary Planning Guidance (SPG), the emerging Hereford Area Plan, the Hereford Transport Strategy and the Herefordshire Infrastructure Delivery Plan. These are dealt with accordingly below.

National Planning Policy Framework (NPPF)

- 3.2 The latest National Planning Policy Framework (NPPF) was published on the 24th July 2018. It constitutes guidance for Local Planning Authorities (LPAs) and decision-takers and sets out the Government's planning policies for England and how these are expected to be applied.
- 3.3 The NPPF acknowledges that the planning system is plan-led and therefore the starting point for decision making, as required by planning law, is for planning applications to be determined in accordance with the development plan unless other material considerations indicate otherwise. It goes on to identify that the NPPF must be taken into account when preparing the development plan and that it is a material consideration in determining applications.

Achieving sustainable development

- 3.4 Paragraph 8 of the NPPF continues to state that achieving sustainable development means that the planning system has three overarching objectives – economic, social and environmental.
- 3.5 At the heart of the NPPF is a presumption in favour of sustainable development as set out in paragraph 11. In terms of decision taking this means:

"c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

Evidence Base

3.6 It is stated at paragraph 31 that Local Plans should be underpinned by relevant and up to date evidence. This should be justified by relevant and up to date evidence which is focused tightly on supporting and justifying the policies concerned, taking into account relevant market signals.

Delivering a sufficient supply of homes

3.7 Paragraph 59 states that *"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."*

Planning for housing

3.8 Paragraphs 67 & 68 show what is expected of local authorities when planning for housing:

"Planning policies should:

- *Identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.*
- *Identify a supply of specific deliverable sites for years one to five and specific developable sites or broad locations for growth over a 15 year time period.*
- *Identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare unless there are strong reasons why it cannot be achieved".*
- *Support the development of windfall sites through their policies and decisions*
- *Work with developers to encourage the subdivision of large sites where this could help to speed up the delivery of homes.*

Maintaining supply and delivery

3.9 Paragraph 73 states that:

'Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. '

- 3.10 Paragraph 73 also states that the supply of specific deliverable sites should include a buffer of 5% (to ensure competition in the market), 10% (where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan), or 20% (where there has been significant under delivery of housing over the previous three years).
- 3.11 Paragraph 74 states that a five year supply of deliverable housing sites can be demonstrated where it has been established in a recently adopted plan or in a subsequent annual position statement.
- 3.12 Paragraph 49 of the March 2012 NPPF stated that *"relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites"*. This provision still applies, but has been relocated to paragraph 11 and its accompanying footnote.

Achieving well-designed places

- 3.13 Paragraph 124 states that *"The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."*
- 3.14 Paragraph 127 takes this further and sets out more detailed guidance.
- 3.15 Finally on this aspect, paragraph 128 states that *"Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests."*

Planning Practice Guidance

Design

- 3.16 This guidance note, which wasn't updated in July 2018, reinforces the view of the NPPF, highlighting that good quality design is an integral part of sustainable development, and states that good design responds in a practical and creative way to both the function and identity of a place. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations which should:
- *ensure that development can deliver a wide range of planning objectives;*
 - *enhance the quality of buildings and spaces; and*

- address the need for different uses sympathetically.

Housing and economic development needs assessments

3.17 In accordance with the NPPF, this guidance supports LPAs in objectively assessing and evidencing development needs for housing (both market and affordable) which includes the Strategic Housing Market Assessment. In the context of this guidance, the need for housing refers to the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period which should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand.

Herefordshire Local Plan Core Strategy

3.18 The Core Strategy is a key policy document that forms part of the Local Plan for Herefordshire and is used in the determination of all planning applications submitted to the Council alongside saved policies contained in the Unitary Development Plan, discussed below. The Core Strategy was adopted by the Council on 16th October 2015 and puts in place a strategic planning framework to guide change and development in the County over the period 2011-31.

3.19 The sites are not included as part of a strategic release in the adopted Core Strategy, and are not identified for development in the UDP. They are, however, being promoted as a non-strategic site through the Hereford Area Plan.

3.20 Policy SS2 of the Core Strategy Local Plan identifies the housing requirement over the Plan period 2011-2031 of 16,500 homes, with 6,500 to be delivered within Hereford. It must be noted that both these figures of 6,500 and 16,500 are *minimum* targets. For the purposes of Policy SS2 this site lies immediately adjacent to the city boundary and therefore within the Hereford Area Plan Boundary. Consequently, it can contribute to the minimum requirement of 6,500 homes for Hereford as set out in Policy SS2 and the wider minimum requirement of 16,500 homes over the Plan period.

3.21 The following Core Strategy policies are considered to be most applicable to the sites (both the application site and the rest of the land within Taylor Wimpey’s control in Hol13 and Stm05):

Policy	Title
Vision, Objectives and Spatial Strategy	
SS1	Presumption in favour of sustainable development
SS2	Delivering new homes
SS3	Releasing land for residential development

SS4	Movement and transportation
SS6	Environmental quality and local distinctiveness
SS7	Addressing climate change
Place Shaping Policies	
HD1	Hereford
HD3	Hereford movement
General Policies	
H1	Affordable housing - thresholds and targets
H3	Ensuring an appropriate range and mix of housing
OS1	Requirement for open space, sport and recreation facilities
OS2	Meeting open space, sport and recreation needs
MT1	Traffic management, highway safety and promoting active travel
Environmental Quality	
LD1	Landscape and townscape
LD2	Biodiversity and geodiversity
LD3	Green infrastructure
SD1	Sustainable design and energy efficiency
Delivery, Implementation and Monitoring	
ID1	Infrastructure delivery

Other Material Considerations

- 3.22 **The Hereford Area Plan** will set out the detailed proposals to ensure the full delivery of the city specific policies in the Core Strategy.
- 3.23 **The Hereford Transport Strategy** includes a programme of infrastructure and services to facilitate growth proposals including:
- real time information on core bus network and stop upgrades;
 - active travel network;
 - extension of Destination Hereford project;
 - Hereford transport hub;
 - city centre refurbishments;
 - bus priority measures;
 - rail track and signal improvements between Hereford and Malvern; and
 - facilities to support electric and low carbon vehicles.
- 3.24 Particular transport infrastructure necessary to bring forward the Core Strategy proposals is detailed in the **Infrastructure Delivery Plan**

Detailed Response to Questions 1, 3 and 8

Question 1 – Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

- 4.1 It is agreed that Site Hol13 – Grafton Lane should be identified as having potential for residential development. In this submission, whilst comments below refer to the whole of Hol13, emphasis is placed on the northern parcels of the site which are subject to ongoing work on a planning application, scheduled to be submitted in the near future, given that there are more technical studies available for this part of Hol13 and given that it is considered that it could be delivered in the short term (0-5 years). Details in relation to land outside the Hol13 application site (i.e. the remainder of Hol13 that is within Taylor Wimpey's control, Stm05 and the land within Taylor Wimpey's control that lies outside the HAP area) are referred to as appropriate.
- 4.2 Whilst there is broad agreement to the allocation of Hol13 as a whole, Taylor Wimpey have concerns in relation to the indicative housing figure given for the whole of Hol13 as it shows a potential capacity of only 155 dwellings.
- 4.3 The application will seek outline planning permission for the proposed construction of up to 250 no. homes and associated access, a potential community facility, a locally equipped area of play (LEAP), SuDS features, a proposed footway/cycleway along the existing section of Grafton Lane that lies within the site, a turning head for the existing four dwellings on the eastern end of Grafton Lane, landscaping and associated infrastructure. This equates to a density of approximately 35 dph.
- 4.4 In accordance with Hereford Council's standards for affordable housing provision in the Core Strategy, it is anticipated that 35% of the dwellings will be affordable homes.
- 4.5 Given that there is the potential to include a community facility, two draft Illustrative Masterplans have been produced, one showing up to 250 homes, and one with a potential community facility on one of the residential parcels. These are appended to this submission.
- 4.6 During the planning application preparation process, a baseline site analysis has been undertaken by a thorough assessment of the site and surroundings, pre-application discussions and a number of

opportunities and influences. These are set out in full in the DAS but include, amongst others:

- Provision of a strong landscape framework based upon the retention of the existing trees and hedgerows along the Site boundaries and the planting of new landscaping to provide opportunities for biodiversity enhancements and support the amenity value of the new development.
- To provide new public open space, which will include a new children's play area and areas for informal recreation.
- To provide areas of wildflower grassland along the railway corridor to maintain the existing reptile corridor.
- Opportunity for a section of Grafton Lane to be converted to a pedestrian/cycleway.
- To provide new SuDS features which will form an integral part of the development's green infrastructure and be designed to maximise landscape biodiversity benefits.
- Creation of a locally distinctive development which draws upon the local Hereford vernacular.
- Existing trees and hedgerows to be retained as an integral part of the development proposals wherever possible with compensatory planting provided where it is necessary to remove vegetation.
- A minimum 10m buffer should be provided between the railway and the proposed development to mitigate noise.
- Areas of ecological value to be retained and/or mitigation provided should be respected.
- The topography of the Site means that a rising main will be need to be provided in the west of the Site. The SuDS features will therefore need to be located along this boundary to manage the surface water run-off.

4.7 The above leads to a Vision, which follows a placemaking approach, and the delivery of a draft Illustrative Masterplan which is informed by the above principles, the technical studies that have been undertaken and the extensive public engagement programme. The developable area has therefore been identified as being approx. 7.13ha with approx. 3.94ha of green infrastructure.

4.8 It can therefore be concluded that, while appearance, landscape, layout and scale are reserved matters, two draft Illustrative Masterplans have been prepared which demonstrate how up to 250 homes with a potential community facility could be delivered on site with a varied mix of starter and family homes, including 35% affordable homes, at a net density of 35 dwellings per hectare. Given the above, it is considered that the proposed development complies with the NPPF and Core Strategy Policies SS6, SS7, H3, OS1, OS2, MT1, LD1, LD2 LD3, and SD1.

4.9 Whilst the current proposals are only focused on the 11.2 hectares subject to the planning application being progressed, the above demonstrates that the potential capacity for the whole of Ho13 is capable of delivering far in excess of the 155 dwellings referred to in the Consultation documentation.

Question 3 – Do you think that any particular sites should be developed in the short, medium or long term?

4.10 The 11.2 hectare site at Grafton Lane has been identified principally to contribute to short term housing needs over the immediate 5 year period. It is for this reason that, in spite of the current unallocated status of the site, a planning application is being prepared in the light of a persistent 5 year housing land supply shortfall in Herefordshire, and the provisions of the previous, and current versions of the NPPF.

4.11 It is therefore the intention that the planning application be submitted shortly with a view to Taylor Wimpey developing the site over the immediate 5 year period.

4.12 Under the above context, the site meets the definition of *deliverable* under the definition which is retained in the Glossary in Annex 2 of the NPPF which states that:

*“To be considered deliverable, sites for housing should be **available** now, offer a **suitable** location for development now, and be **achievable** with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered **deliverable** until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.” [our emphasis]*

4.13 It therefore falls to assessing the site against the criteria outlined above to demonstrate whether the site is deliverable. The application site comprises vacant land and is under the control of one landowner. The applicant is a national housebuilder. It was promoted through the Core Strategy and is being promoted by the same national housebuilder through the Hereford Area Plan as being ready for development. The site is therefore considered to be **available** now.

4.14 The site lies adjacent to the settlement boundary of Hereford, the

Main Urban Area in the settlement hierarchy as identified in the Core Strategy Local Plans, Spatial Strategy Background Paper – January 2010. Hereford needs to deliver a minimum of 6,500 homes over the Core Strategy Plan Period 2011-2031, with 1,000 to 1,500 homes yet to be identified, which will be delivered through the Hereford Area Plan 2011-2031. The site is not subject to any specific designations where development should be restricted therefore the site is considered to be a **suitable** location for development now.

- 4.15 The technical studies that have been prepared in order to accompany the planning application demonstrate that there are no known constraints which would prevent development commencing, and being completed, within the next 5 years. This is supported by the fact that the site has the involvement of a national house builder. There is therefore a realistic prospect that housing will be delivered on the site within five years therefore the site is considered to be **achievable**.
- 4.16 Consequently, the site meets the tests set out in the NPPF and the glossary and as such the proposed development is considered to be **deliverable**.
- 4.17 In conclusion, the release of the application site would represent a development which is deliverable in the short term (i.e. within the next 5 years monitoring period) and can provide a significant contribution to improving the current 5 year housing land supply shortfall.
- 4.18 In terms of the remainder of Hol13 that is within the control of Taylor Wimpey, many of the characteristics and technical issues applicable to the application site still prevail, albeit this is only known on a high level at this stage. The remainder of Hol13 extends further south and closer to the existing development within Grafton therefore other criteria need to be considered that were not as applicable in the application documentation. It is considered that these additional parcels within Hol13 are **available** and **suitable** in accordance with the NPPF. In theory, they are also **achievable**, thus making the remainder of Hol13 **deliverable**, but it is acknowledged that a more realistic timetable for delivery would be in the medium to long term within the Plan period.
- 4.19 In terms of Stm05, again as no planning application is being prepared then detailed technical evidence is not yet available. Notwithstanding, and as with the remainder of Hol13, it is considered that the technical matters that are applicable to the planning application site will largely prevail in relation to Stm05, albeit with some differences given the slightly different site characteristics. Further, given the discrete nature of Stm05 and the fact that it is an infill site and is opposite existing development, this parcel could be delivered in the short term (0-5 years) and is therefore considered **available**, **suitable** and **achievable**, and therefore **deliverable** in accordance with the NPPF.

Question 8 – Do you have any comments on the document and the approach used to identify potential sites?

- 4.20 Under the above question reference is made to the Technical Site Assessments which have informed the site assessment schedule in the main consultation document. In this instance the assessment for Hol13 is specifically referred to on Page 76 of the Consultation Paper.
- 4.21 It is acknowledged that the document recognises in Paragraph 4.3 that the site assessment is an iterative process and that more information on sites may be added on to the assessment after the consultation has taken place. This will be in line with NPPF Paragraph 31 which emphasizes that plans should be supported by adequate and up to date evidence.
- 4.22 With reference to the technical studies prepared to support the emerging planning application comments are provided on the key issues highlighted in the Technical Site Assessments under the appropriate headings below. Information in relation to Stm05, the remainder of Hol13 in Taylor Wimpey's control and the remainder of the land within Taylor Wimpey's control that lies outside the HAP area will be produced at the appropriate stage.

Highways and Transport

Access to Alternative Modes of Transport

- 4.23 A Transport Assessment has been undertaken by Asbri Transport Ltd. It is intended that pedestrians and cyclists will still have access through the existing Grafton Lane and a turning head will be provided where Grafton Lane is proposed to be stopped up, to serve the existing 4 properties on the eastern end of Grafton Lane.
- 4.24 The site is located adjacent to the settlement boundary of Hereford and has good access to public transport with bus stops located adjacent to the site on the A49. Footways are to be provided throughout the site and a section of Grafton Lane will be stopped up for vehicular traffic and will become a dedicated cycleway/footway.
- 4.25 A separate Travel Plan has been prepared, also undertaken by Asbri Transport, which details the approach that Taylor Wimpey will adopt to ensure that all residents of the development site are fully aware of their travel opportunities to promote the use of sustainable transport modes and to reduce the reliance on the private car.

Access

- 4.26 It is the intention that access is to be considered in the planning application with all other matters reserved. The proposal entails the formation of a new 4-armed signal controlled junction on the A49 which will incorporate the existing priority junction with Romany Way, approx. 65m south of the existing Grafton Lane junction. Grafton Lane will be stopped up for vehicular traffic to the west of Newlands, approx. 280m from the A49/Grafton Lane junction.

Impact on Local Road Network

- 4.27 The aforementioned Transport Assessment establishes the conditions that exist within the surrounding transport network and then details the likely transport characteristics of the proposed development, identifying the potential impact of the proposals on the surrounding transport network.
- 4.28 With regard to the proposed development's traffic impact on the operation of the local highway network, it is considered the traffic movements associated with the development proposal could be accommodated on the existing highway network and that there will not be a detrimental impact on the free flow of traffic using the local highway network.
- 4.29 It is has been clearly demonstrated the development of the site will not adversely impact on the existing highway network so that the residual cumulative impacts of the development are "severe", and that the site can be safely accessed in accordance with planning policy, including Core Strategy Policies SS4, HD3 and MT1.

Landscape and Visual Impact

- 4.30 A Landscape and Visual Impact Assessment (LVIA) has been undertaken by CSA Environmental and considers the effects of the proposed development on both landscape character and views. The LVIA confirms that the site is not covered by any designations for landscape character or quality.
- 4.31 The LVIA assesses the site's quality, sensitivity and value as medium, and that the proposed development will be well related to the existing housing to the south and west. It continues by stating that as the proposed development will be well related to the existing built development, as well as the fact that views of the new homes will be limited to those from the near distance, the effects of the proposed development on the surrounding landscape will be limited.
- 4.32 The site's fields will be built upon with new areas of open space and associated infrastructure. The LVIA recognises that although the character of the site will change, there will be limited effects on landscape character of the wider countryside.

- 4.33 The LVIA concludes by stating that, given the above, the site is capable of accommodating the proposed development in landscape and visual terms without resulting in material landscape or visual harm to the wider landscape/townscape around the site. Given the above, it is considered that the proposed development complies with Core Strategy Policies SS6 and LD1.

The Built and Historic Environment

- 4.34 In terms of the impact on the setting of St Peters Church, Bullingham, the development of the 11.2 hectares proposed will not have an impact and this may be an issue to be addressed in considering future phases to the south.
- 4.35 In terms of archaeology, Wessex Archaeology was commissioned to prepare a Historic Environment Desk Based Assessment to assess the known and potential heritage resource within the site and the surrounding area, and to assess the likely impacts of the development proposals on this resource. This study has identified no overriding heritage constraints which are likely to prohibit development.
- 4.36 Within the site the assessment identifies the potential for the presence of buried archaeological remains, however, any adverse effect could be reduced through the implementation of an appropriate scheme of archaeological mitigation, in accordance with national and local planning policy. This can be secured via an appropriately worded planning condition. Given the above, it is considered that the proposed development complies with NPPF para 133 and Core Strategy Policies SS6.

Biodiversity/Ecology

- 4.37 Aspect Ecology has undertaken an Extended Phase I Habitat Survey and a number of protected species surveys, all of which are addressed in the Ecological Appraisal that will accompany the planning application.
- 4.38 The site itself is not subject to any statutory or non-statutory ecological designations. The nearest statutory designation is Belmont Meadows LNR, located approximately 0.7km west of the site, whilst the nearest European-level conservation designation is River Wye SAC, located approximately 1.3km north east of the site at its closest point. The nearest non-statutory designation is Active Railway South of Wye SINC, located adjacent to the northern site boundary.
- 4.39 As such, a number of measures are set out in the Ecological Appraisal to safeguard designations throughout construction. In the long term, given the scale of the proposals and the accessibility of the designations from the site, it is considered unlikely that these, or any

other, more distant ecological designations, will be adversely affected by the proposals.

- 4.40 The habitats within the site are largely considered to be of no more than low ecological value at the local level, with the exception of hedgerows and trees which are considered to be of low to moderate ecological value at the local level and of elevated value in the context of the site. These habitats are largely retained and enhanced under the proposals, with habitat creation proposed to compensate for any losses.
- 4.41 The habitats within the site have been recorded to support a range of fauna, including a modest assemblage of bats and populations of Slow-worm and Common Lizard, as well as providing potential opportunities for roosting bats and nesting birds. Appropriate mitigation measures will therefore be implemented to safeguard these species during relevant site clearance works and construction.
- 4.42 The proposals present the opportunity to secure a number of net gains for biodiversity, including additional native tree, shrub and hedgerow planting, hedgerow management, the creation of wildflower grassland and new roosting/nesting opportunities and reptile hibernacula/refugia.
- 4.43 In summary, the proposals will seek to minimise impacts and subject to the implementation of appropriate avoidance, mitigation and compensation measures, it is considered unlikely that the proposals will result in significant harm to biodiversity. Indeed, the opportunity exists to provide a number of net gains for biodiversity as part of the proposals.
- 4.44 As well as the above study information, it is intended that the planning application will be accompanied by a Flood Risk Assessment (Vectos); Tree Survey Report (Aspect Arboricultural); Geotechnical and Geo-Environmental Reports (Terra Firma); Noise and Vibration Impact Assessment (RSK).
- 4.45 A Statement of Community Consultation details the public consultation process which has been undertaken, this included the pre application advice received from the Council (28th November 2017, following a meeting on the 6th November 2017) and the public consultation event held on the 28th November 2017), as well as setting out the comments raised during the consultation period and detailing how these have been taken into consideration in finalising the planning application. Given the above, it is considered that the proposed development complies with paragraphs 39-43 of the NPPF.

- 4.46 In terms of planning obligations, responses to pre-application advice sought with the Authority confirmed the 35% affordable housing provision would be required, and the likely level of planning obligations which would be sought, including site play provision and adoption; off-site leisure contributions; and contributions to education facilities.
- 4.47 It is proposed that the final detail of any planning obligations will be discussed and agreed with officers during the course of the determination of the planning application and will be secured via a Section 106 Agreement. Given the above, it is considered that the proposed development will comply with Core Strategy Policies H1 and ID1.

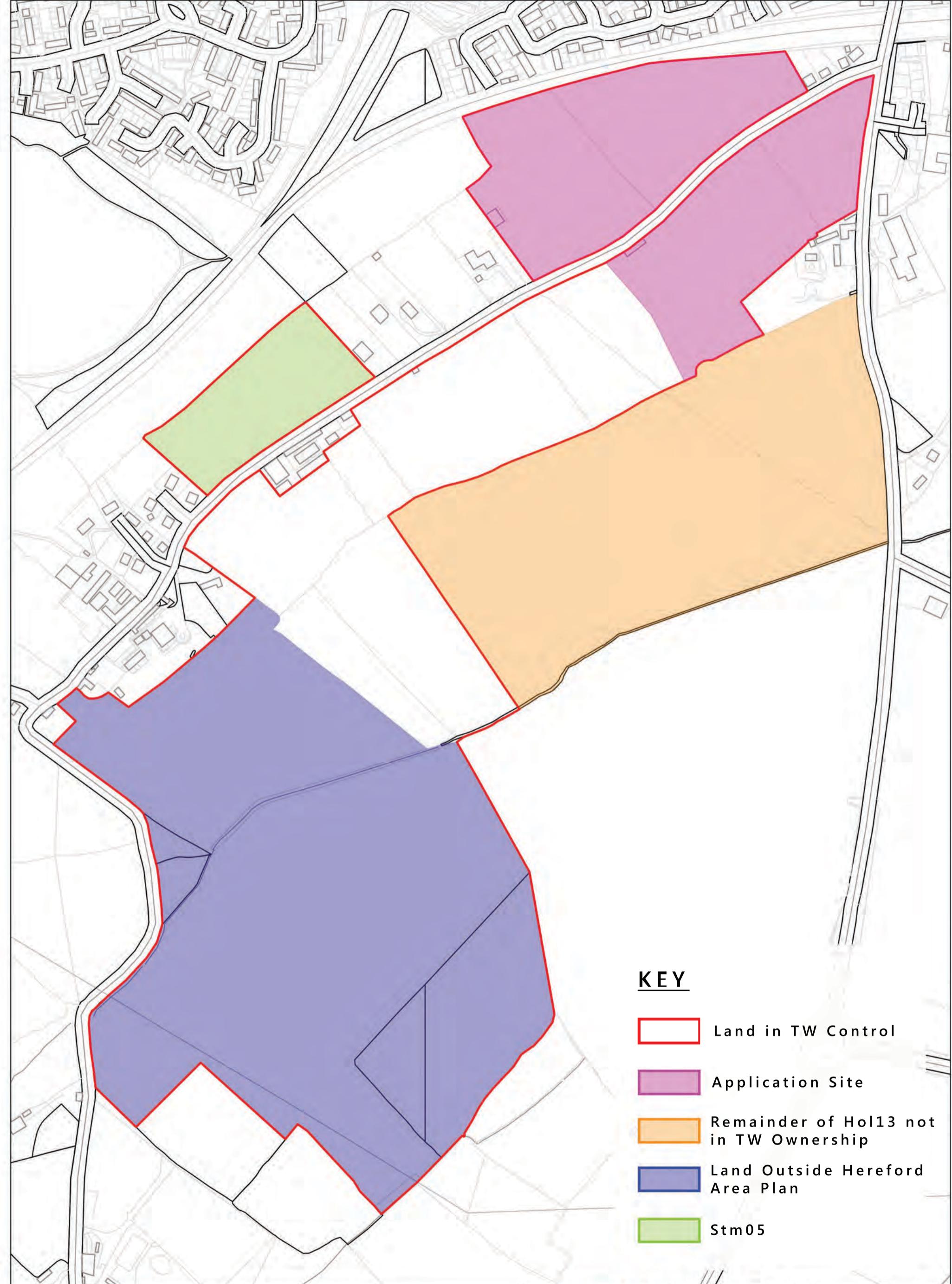
Conclusion

- 5.1 This Statement has been prepared on behalf of Taylor Wimpey plc to respond to the Housing and Employment Site Options Consultation and elaborate on the accompanying forms, with regard to Land at Grafton Lane (Hol 13) and Land opposite Leys Farm, Grafton Lane (Stm05).
- 5.2 As set out in the introduction to this report, Taylor Wimpey has an option on the land identified in red on the Site Location Plan attached at **Appendix 1**. This land is contained within part of the Hol13 allocation and it also includes the whole of the Stm05 allocation. Some of the land identified in the red line lies adjacent to but outside the HAP area (within the Callow and Haywood Parish Group), but it is promoted here for completeness to demonstrate potential future development. This is identified in blue on the Site Location Plan in **Appendix 1**.
- 5.3 Work is currently underway with a view to submitting an outline planning application with all matters reserved except for access for the proposed development of land to the north and south of Grafton Lane, Hereford. This includes 4 of the fields contained within Hol13. This proposed outline planning application area is identified in pink on the Site Location Plan in **Appendix 1**. Further, there is land in Taylor Wimpey's control that lies in between the pink land and blue. This is identified in white in **Appendix 1**. The Stm05 land is identified in green on **Appendix 1**.
- 5.4 Finally, part of Hol13 lies outside the control of Taylor Wimpey. Consequently, it is not appropriate to make detailed representations on this element within this report. This is identified in orange on the plan in **Appendix 1**. Notwithstanding, Taylor Wimpey supports the allocation of this part of Hol13 should its delivery contribute to a more comprehensive and more appropriate scheme overall.
- 5.5 Reference is made throughout these representations to the outline planning application which is being prepared on the northern part of the overall area (11.2 hectares, identified in pink in **Appendix 1**) for the construction of up to 250 homes (with all matters reserved except for access), a potential community facility, public open space, landscaping and associated infrastructure works.
- 5.6 Draft Illustrative Masterplans showing site options, which are appended to the submission and which have been informed by the technical studies and the prevailing characteristics of the site and surroundings, have been produced. They demonstrate how up to 250 homes and a potential community facility could be accommodated within the 11.2ha site without any detrimental harm being caused, subject to appropriate mitigation.

- 5.7 Concerns are consequently expressed regarding the number of units – 155 identified in the consultation documents for the whole of Hol13, which amounts to approx. 34.6ha. This is a concern expressed in the context of Question 1 of the accompanying questionnaire as it would result in an inefficient use of the land identified as part of Hol13.
- 5.8 With regard to Question 3 the site is considered to be **deliverable** in accordance with the provisions of NPPF in that the site is **available, suitable and achievable**. As such the proposed development can make a valuable contribution to the Council's 5 housing land supply, as well as providing up to 35% affordable housing.
- 5.9 With reference to remainder of Hol13 that lies within Taylor Wimpey's control, that site is also considered to be **available** and **suitable** in accordance with the NPPF. In theory, it is also **achievable**, thus making the remainder of Hol13 **deliverable**, but it is acknowledged that a more realistic timetable for delivery would be in the medium to long term within the Plan period.
- 5.10 In terms of Stm05, again as no planning application is being prepared then detailed technical evidence is not yet available. Notwithstanding, and as with the remainder of Hol13, it is considered that the technical matters that are applicable to the planning application site will largely prevail in relation to Stm05, albeit with some differences given the slightly different site characteristics. Further, given the discrete nature of Stm05 and the fact that it is an infill site and is opposite existing development, this parcel could be delivered in the short term (0-5 years) and is therefore considered **available, suitable and achievable**, and therefore **deliverable** in accordance with the NPPF.
- 5.11 With reference to the supporting evidence prepared, and referred to in the context of Question 8, it is concluded that the proposal is acceptable in relation to national guidance and the development plan and there are no material considerations which should prevent the site from being considered in the light of the relevant planning policy framework. It is therefore respectfully requested that Herefordshire Council consider these representations in the light of a future non-strategic housing land allocation in the Hereford Area Plan.

Appendix 1

Hereford Area Plan Site Location Plan



KEY

- Land in TW Control
- Application Site
- Remainder of Hol13 not in TW Ownership
- Land Outside Hereford Area Plan
- Stm05

Drawing Title Hereford Area Plan Site Location Plan	Client Taylor Wimpey	 <small>Unit 9 Oak Tree Court Mulberry Drive Cardiff Gate Business Park Cardiff CF23 8RS</small>	Scale: NTS			
	Job Title Grafton Lane		Designed by: GJ Drawn by: GJ	Ckd/Appd: PS 1st Issued: Oct 2018 Job No: 17.174	Rev. Date. Amendment. Des. Dm. Rev. Drg No. A	

Appendix 2

Illustrative Masterplan - Residential



Pocket greens will break up the streetscene and aid legibility through the development

Potential acoustic buffer to mitigate noise from adjacent railway

Potential for provision of areas of wildflower grassland along the railway corridor to retain reptile habitat

Opportunity for new boundary landscaping to filter views of the development

Section of Grafton Lane to be converted to pedestrian/cycleway. A turning head will be provided to retain access to the existing properties and allow for suitable refuse requirements

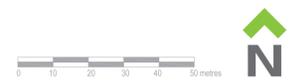
The existing vegetation will be retained as an integral part of the Site's network of public open space

Potential pedestrian link

Section of Grafton Lane to be converted to pedestrian/cycleway

Potential pedestrian link providing a connection from the proposed recreational routes to the existing public footpath

New boundary planting will create a landscaped edge to the development



- Site Boundary
- Proposed vehicular access point
- Proposed pedestrian/cycle linkages
- Existing Vegetation
- Residential Development
- Play Area
- Sustainable Drainage Features (SuDS)
- Proposed recreational routes
- Existing recreational footway

Rev	Date	By	Description

CSA
environmental

Dixies Barns, High Street,
Ashwell, Hertfordshire SG7 5NT

T 01462 743647
E ashwell@csaenvironmental.co.uk
W csaenvironmental.co.uk

Project Grafton Lane, Hereford

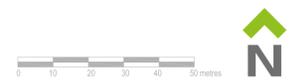
Drawing Title Illustrative Masterplan

Client Taylor Wimpey UK Ltd

Scale @ A1 1:1000 Drawing No. CSA/2477/111
Date April 2018 Rev .
Drawn RR/JB Checked RR

Appendix 3

Illustrative Masterplan – with community facility



-  Site Boundary
-  Proposed vehicular access point
-  Proposed pedestrian/cycle linkages
-  Existing Vegetation
-  Community Centre
-  Residential Development
-  Play Area
-  Sustainable Drainage Features (SuDS)
-  Proposed recreational routes
-  Existing recreational footway

Rev	Date	By	Description
B	08/06/18	BRY	Community facility added

CSA
environmental

Dixies Barns, High Street,
Ashwell, Hertfordshire SG7 5NT

T 01462 743647
E ashwell@csaenvironmental.co.uk
W csaenvironmental.co.uk

Project Grafton Lane, Hereford

Drawing Illustrative Masterplan with Community Facility
Title

Client Taylor Wimpey UK Ltd

Scale @ A1 1:1000 Drawing No. CSA/2477/109
Date April 2018 Rev B
Drawn RR/JB Checked RR

Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address:
www.herefordshire.gov.uk/herfordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herfordareaplan as well as at libraries and information centres across the county.

**Complete the questions for as many sites as you would like to comment on.
Please include the site reference for any you are making a specific comment on.**

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

If no, please explain:

The identification of site Thr 21 as having potential is agreed and supported by Taylor Wimpey.

Reference is made in the Supporting Statement attached, to the previous planning application (163345) which was regarded as premature pending the finalisation of the line for the Relief Road.

A preferred route has subsequently been identified which does not impact directly on Thr21.

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer:

The 2.9 hectare west of Huntingdon Lane (Part of Ho1 13) has been identified principally to contribute to short term needs over a 5 year period. It is for this reason that a planning application was submitted in the light of a persisting 5 year land supply shortfall.

The attached Supporting Statement refers to ongoing work where there is confidence that previous reasons for refusal can be addressed.

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

No further comments.

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

If yes, please supply site details:

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain:

Concern is expressed on a cap on development pending the construction of the HRR. The preferred Red Route for the relief road does not affect Thr21, albeit it is acknowledged that this route is not yet defined. Notwithstanding, alternative access issues to protect the lime trees are being explored. Groundwater matters will also be explored, but this issue is also delaying the determination of the Three Elms strategic site. If these issues can be resolved there is no reason why the site can't come forward in the short term.

Please refer therefore to the attached Supporting Statement.

(Please use additional box at the back of questionnaire if you need more space to comment)

About you:

Name:...Taylor Wimpey plc

.....

Address:.....c/o Asbri Planning Ltd, Unit 9 Oak Tree Court, Mulberry Drive, Cardiff Gate Business Park, Cardiff CF23 8RS.

.....

.....

Email:... Alex.Anderson@taylorwimpey.com keith@asbriplanning.co.uk
pete@asbriplanning.co.uk

.....

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (FoI) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways:
Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to:
Forward Planning

Herefordshire Council Offices
Plough Lane
Hereford
HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Question 8 continued...

Hereford Area Plan (HAP)

Housing and
Employment Site
Options
Consultation

Land West of
Huntington Lane,
Three Elms Road
Hereford

(Thr21)



Contents

Section 1

Introduction

Section 2

Site description and background

Section 3

Planning Policy Context

Section 4

Detailed Response to Questions 1, 3 and 8

Section 5

Conclusion

Appendix 1 – Site Location Plan

Introduction

- 1.1 Asbri Planning Ltd. has been instructed by Taylor Wimpey to respond to the current Hereford Area Plan (HAP) Housing and Employment Site Options Consultation in respect of land to the West of Huntington Lane, Three Elms Road, Hereford HR4 0RG (Thr21). Taylor Wimpey has an option on the land outlined red on the Site Location Plan attached at **Appendix 1**.
- 1.2 An outline planning application for up to 80 dwellings was submitted in October 2016 (Ref: 163345) but was subsequently refused on the 16th January 2017, with 5 reasons for refusal. The reasons for refusal are partly addressed in these representations, setting out why they can all be overcome. Taylor Wimpey plc nevertheless welcomes the identification of Thr21, which corresponds with the application site, as being considered as suitable for development in the plan period, with the site being deliverable within the short to medium term.
- 1.3 The submission accompanies the consultation questionnaire and provides information based on technical studies prepared to support the planning application and subsequent considerations, albeit some of that technical information is now somewhat dated. In this context Questions 1, 3 and 8 on the forms are of particular relevance, and are addressed accordingly.
- 1.4 This submission briefly describes the site and the background to current proposals in Section 2; Section 3 appraises the site within the context of planning policy; Section 4 elaborates on Questions 1, 3 and 8 of the submitted forms; whilst Section 5 concludes the Statement.

Site Description and Background

- 2.1 The Site is 2.85 hectares in area, roughly triangular in shape, and relatively level in nature. It consists of a single arable field bounded by hedgerows. It lies to the north of the A438 Kings Acre Road, and to the west of Huntington Lane. The site lies some 2.5 kilometres to the west of Hereford City Centre.
- 2.2 The north eastern Site boundary runs along Huntington Lane, and comprises a dense hedge of coppiced hazel, elm scrub, hawthorn and ivy with occasional tall ash trees. The central and northern part of the lane as it passes the Site runs through a tunnel of vegetation, where the tall hedges to each side meet over the road. The southern section of the lane is more open, with a trimmed thorn hedge on the eastern side and a gap with some low brambles only on the western (Site) side. To the east of Huntington Lane there is a small, uncultivated field bounded on its eastern and northern sides by a mixed species hedge up to 7m in height, and beyond that is a large arable field.
- 2.3 To the south east of the Site there is a single detached property ('Midmeadows'), which has a tall hedgerow of conifers and beech around the northern and western sides of its curtilage, effectively screening it from the Site. A further single detached property lies to the south-west. On the opposite side of Kings Acre Road there is continuous frontage development which extends in a linear fashion for a further kilometre to the west.
- 2.4 The southern Site boundary runs along Kings Acre Road, and is marked by a variable hedgerow of hawthorn, rose, ivy and bramble, with some young oak and ash trees. This hedge is tall and dense in places, but also has some lower sections and a gap roughly in the centre of the Site boundary. The boundary runs at the back of a broad verge to the road, and within the verge there is an avenue of mature lime trees.
- 2.5 In terms of the planning history of the site, an outline planning application for the proposed construction of up to 80 no. residential units with associated works (all matters reserved apart from access) was submitted on 20th September 2016 and subsequently given the reference number 163345. The application was accompanied by the following documentation:
 - Drawing Package prepared by CSa Environmental;
 - Design & Access Statement prepared by CSA Environmental;
 - Landscape and Visual Appraisal prepared by CSa Environmental;
 - Transport Statement prepared by Asbri Transport;
 - Arboricultural Impact Assessment prepared by Aspect Arboriculture;
 - Ecological Appraisal prepared by Aspect Ecology;

- Archaeology Report prepared by Wessex Archaeology;
- Flood Risk Assessment prepared by Vectos;
- Drainage Strategy prepared by Vectos;
- Utilities Appraisal prepared by Vectos;
- Noise Assessment prepared by RSK Environment;
- Statement of Community Involvement;

- 2.6 The delegated officer report which considered the application referred to objections submitted by the Council's Traffic Manager to the proposed access arrangements off Kings Acre Road, together with prematurity concerns in relation to the proposed bypass route. The Traffic Manager stated that the introduction of new junctions in the relief road route corridor, if selected between Bay Horse Inn and Huntington Lane, would need to accommodate 3 junctions within 500 metres. As well as the access proposed, these would involve access to the wider Three Elms/Western Urban Expansion (WUE) site, and to the relief road itself.
- 2.7 The Council's Conservation Manager (Tree Officer) expressed concern regarding the removal of mature lime trees adjacent to Kings Acre Road. An objection was submitted on this basis.
- 2.8 The case officer, in summarising the responses, which also included objections from Breinton Parish Council and the Church Commissioners (the latter again on prematurity grounds regarding the HRR route), cited the key issues in the determination of the planning application as:
- The implications on the route selection of the Hereford Relief Road;
 - Impact of the proposals upon the safe operation of the highway network; and
 - Impact on the character of the area with specific regard to arboricultural impacts.
- 2.9 In addition reference was made to the Environment Agency's objection to the potential impact on groundwater quality where large local food and drink manufacturers (including Heineken) rely on water extraction from the Source Protection Zone. Similar concerns were expressed in terms of the Church Commissioners' planning application at Three Elms. The issue has contributed to the non-determination of that planning application.
- 2.10 The decision notice was subsequently issued in January 2017, with 5 reasons for refusal. The relating to prematurity (in relation to the proposed relief road), access, groundwater and the lack of a planning obligation.

Planning Policy Context

Introduction

- 3.1 The starting point in considering development at the location proposed is the statutory development plan which consists of the Herefordshire Council Local Plan Core Strategy (adopted October 2015). In addition to the above, other key material considerations include the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG), the saved policies of the Unitary Development Plan (UDP), Herefordshire Council Supplementary Planning Guidance (SPG), the emerging Hereford Area Plan, the Hereford Transport Strategy and the Herefordshire Infrastructure Delivery Plan. These are dealt with accordingly below.

National Planning Policy Framework (NPPF)

- 3.2 The latest National Planning Policy Framework (NPPF) was published on the 24th July 2018. It constitutes guidance for Local Planning Authorities (LPAs) and decision-takers and sets out the Government's planning policies for England and how these are expected to be applied.
- 3.3 The NPPF acknowledges that the planning system is plan-led and therefore the starting point for decision making, as required by planning law, is for planning applications to be determined in accordance with the development plan unless other material considerations indicate otherwise. It goes on to identify that the NPPF must be taken into account when preparing the development plan and that it is a material consideration in determining applications.

Achieving sustainable development

- 3.4 Paragraph 8 of the NPPF continues to state that achieving sustainable development means that the planning system has three overarching objectives – economic, social and environmental.
- 3.5 At the heart of the NPPF is a presumption in favour of sustainable development as set out in paragraph 11. In terms of decision taking this means:

"c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

Evidence Base

- 3.6 It is stated at paragraph 31 that Local Plans should be underpinned by relevant and up to date evidence. This should be justified by relevant and up to date evidence which is focused tightly on supporting and justifying the policies concerned, taking into account relevant market signals.

Delivering a sufficient supply of homes

- 3.7 Paragraph 59 states that *“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”*

Planning for housing

- 3.8 Paragraphs 67 & 68 show what is expected of local authorities when planning for housing:

“Planning policies should:

- *Identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.*
- *Identify a supply of specific deliverable sites for years one to five and specific developable sites or broad locations for growth over a 15 year time period.*
- *Identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare unless there are strong reasons why it cannot be achieved”.*
- *Support the development of windfall sites through their policies and decisions*
- *Work with developers to encourage the subdivision of large sites where this could help to speed up the delivery of homes.*

Maintaining supply and delivery

- 3.9 Paragraph 73 states that *‘Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. ‘*

- 3.10 Paragraph 73 also states that the supply of specific deliverable sites should include a buffer of 5% (to ensure competition in the market), 10% (where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement

or recently adopted plan), or 20% (where there has been significant under delivery of housing over the previous three years).

- 3.11 Paragraph 74 states that a five year supply of deliverable housing sites can be demonstrated where it has been established in a recently adopted plan or in a subsequent annual position statement.
- 3.12 Paragraph 49 of the March 2012 NPPF stated that *"relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites"*. This provision still applies, but has been relocated to paragraph 11 and its accompanying footnote.

Achieving well-designed places

- 3.13 Paragraph 124 states that *"The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."*
- 3.14 Paragraph 127 takes this further and sets out more detailed guidance.
- 3.15 Finally on this aspect, paragraph 128 states that *"Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests."*

Planning Practice Guidance

Design

- 3.16 This guidance note, which wasn't updated in July 2018, reinforces the view of the NPPF, highlighting that good quality design is an integral part of sustainable development, and states that good design responds in a practical and creative way to both the function and identity of a place. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations which should:
- *ensure that development can deliver a wide range of planning objectives;*
 - *enhance the quality of buildings and spaces; and*
 - *address the need for different uses sympathetically.*

Housing and economic development needs assessments

- 3.17 In accordance with the NPPF, this guidance supports LPAs in objectively assessing and evidencing development needs for housing (both market and affordable) which includes the Strategic Housing Market Assessment. In the context of this guidance, the need for housing

refers to the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period which should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand.

Herefordshire Local Plan Core Strategy

- 3.18 The Core Strategy is a key policy document that forms part of the Local Plan for Herefordshire and is used in the determination of all planning applications submitted to the Council alongside saved policies contained in the Unitary Development Plan, discussed below. The Core Strategy was adopted by the Council on 16th October 2015 and puts in place a strategic planning framework to guide change and development in the County over the period 2011-31.

- 3.19 The site forms part of the Western Urban Expansion Area (known as Three Elms) within Herefordshire’s adopted Core Strategy, under Policy HD5. This strategic allocation provides for 1000 new homes as well as employment uses.

- 3.20 Policy SS2 of the Core Strategy Local Plan identifies the housing requirement over the Plan period 2011-2031 of 16,500 homes, with 6,500 to be delivered within Hereford. It must be noted that both these figures of 6,500 and 16,500 are *minimum* targets. For the purposes of Policy SS2 this site lies immediately adjacent to the city boundary and therefore within the Hereford Area Plan Boundary. Consequently, it can contribute to the minimum requirement of 6,500 homes for Hereford as set out in Policy SS2 and the wider minimum requirement of 16,500 homes over the Plan period.

- 3.21 The following Core Strategy policies are considered to be most applicable to the site:

Policy	Title
Vision, Objectives and Spatial Strategy	
SS1	Presumption in favour of sustainable development
SS2	Delivering new homes
SS3	Releasing land for residential development
SS4	Movement and transportation
SS6	Environmental quality and local distinctiveness
SS7	Addressing climate change
Place Shaping Policies	
HD1	Hereford
HD3	Hereford movement
General Policies	
H1	Affordable housing - thresholds and targets
H3	Ensuring an appropriate range and mix of housing
OS1	Requirement for open space, sport and recreation facilities
OS2	Meeting open space, sport and recreation needs

MT1	Traffic management, highway safety and promoting active travel
Environmental Quality	
LD1	Landscape and townscape
LD2	Biodiversity and geodiversity
LD3	Green infrastructure
SD1	Sustainable design and energy efficiency
Delivery, Implementation and Monitoring	
ID1	Infrastructure delivery

Other Material Considerations

- 3.22 **The Hereford Area Plan** will set out the detailed proposals to ensure the full delivery of the city specific policies in the Core Strategy.
- 3.23 **The Hereford Transport Strategy** includes a programme of infrastructure and services to facilitate growth proposals including:
- real time information on core bus network and stop upgrades;
 - active travel network;
 - extension of Destination Hereford project;
 - Hereford transport hub;
 - city centre refurbishments;
 - bus priority measures;
 - rail track and signal improvements between Hereford and Malvern; and
 - facilities to support electric and low carbon vehicles.
- 3.24 Particular transport infrastructure necessary to bring forward the Core Strategy proposals is detailed in the **Infrastructure Delivery Plan**.

Detailed Response to Questions 1, 3 and 8

Question 1 – Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

- 4.1 It is agreed that Site Thr21 – Land West of Huntington Lane, Three Elms Road, Hereford should be identified as having potential for residential development within the Plan Period.
- 4.2 Whilst there is broad agreement to the allocation of Thr21, Taylor Wimpey have concerns in relation to the fact that the Technical Site Assessment focuses on the issues associated with the previous reasons for the refusal of the earlier outline planning application 163345. In doing so the assessment does not give sufficient acknowledgement to those issues which were resolved in the planning application, or the potential to resolve the reasons for refusal, two of which referred to the proposed route of the relief road which fall away once the route is finalized (assuming the site is not affected by the route) and one of which is simply relating to the lack of a planning obligation, which is easily addressed.
- 4.3 The documents which accompanied the planning application were largely accepted by the Council in the Delegated Officer Report. It was stated in Paragraph 6.7 of the Report that:
'Taking all the above into account, it is your officers' opinion that the site is appropriate for residential development in spatial terms. The site is well related to Hereford and encircled by the largest strategic allocation in Hereford. Thus, having regard to the fact that policies relevant for the supply of housing are out-of-date, officers conclude overall that but for concerns in relation to the HRR that will be discussed below, the principle of development at this location is acceptable.'
- 4.4 Paragraph 6.9 went on to state that:
'...the contribution that the scheme would make towards the supply of housing (including 35% affordable housing), particularly in the context of the close connection to the County's main focus for growth, is a significant material consideration telling in favour of the proposal. Moreover, development of this site for housing does not conflict with the spatial strategy as set out in CS policies SS2 and SS3.'
- 4.5 With the identification of the preferred Red Route in the Route Selection Report issued earlier this year, it has been established that the site is not directly affected. This is acknowledged in the conclusion of the Technical

Assessment. This removes some concerns regarding prematurity. However it is acknowledged that the planning case for the best performing route has yet to be tested through the planning application process.

Question 3 – Do you think that any particular sites should be developed in the short, medium or long term?

- 4.6 The 2.86 hectare site to the west of Huntington Lane was identified principally to contribute to short term housing needs over a 5 year period. In 2016, without any progress on the identification of a preferred route, the submission of a planning application by the Church Commissioners on the wider strategic allocation known as Three Elms, and a diminishing 5 year housing land supply, Taylor Wimpey took a Board decision to submit an outline planning application.
- 4.7 The reasons for refusal, particularly those related to the relief road, have delayed the progression of the proposals. Those relating to the loss of the lime trees and the Section 106 agreement can be resolved, whilst the impact on groundwater also relates to the Church Commissioners' scheme.
- 4.8 Options are currently being progressed in relation to potential changes to the site layout with a view to enhancing connectivity with the wider strategic allocation. Furthermore consideration is being given to an access arrangement which reduces the number of potential new junctions between Bay Horse Inn and Huntington Lane.
- 4.9 If these issues can be resolved there is a degree of confidence that the development could be deliverable in the short term (i.e. within the next 5 years monitoring period) and can provide a significant contribution to improving the current 5 year housing land supply shortfall.
- 4.10 Under the above context, the site meets the definition of *deliverable* under the definition which is retained in the Glossary in Annex 2 of the NPPF which states that:

*"To be considered deliverable, sites for housing should be **available** now, offer a **suitable** location for development now, and be **achievable** with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered **deliverable** until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where*

there is clear evidence that housing completions will begin on site within five years.” [our emphasis]

- 4.11 It therefore falls to assessing the site against the criteria outlined above to demonstrate whether the site is deliverable. The application site comprises vacant land and is under the control of one landowner. The applicant is a national housebuilder. It was promoted through the Core Strategy and is being promoted by the same national housebuilder through the Hereford Area Plan as being ready for development. The site is therefore considered to be **available** now.
- 4.12 The site lies adjacent to the settlement boundary of Hereford, the Main Urban Area in the settlement hierarchy as identified in the Core Strategy Local Plans, Spatial Strategy Background Paper – January 2010. It is also surrounded by an existing strategic allocation and is in the area where growth in Hereford is preferred, in accordance with the committee report and as evidenced by the adjacent strategic allocation.
- 4.13 Hereford needs to deliver a minimum of 6,500 homes over the Core Strategy Plan Period 2011-2031, with 1,000 to 1,500 homes yet to be identified, which will be delivered through the Hereford Area Plan 2011-2031. The site is not subject to any specific designations where development should be restricted, therefore the site is considered to be a **suitable** location for development now.
- 4.14 The technical studies that were prepared in order to accompany the planning application demonstrate that there are no known constraints which would prevent development commencing, and being completed or substantially, within the next 5 years, albeit some of those studies would need refreshing to accompany any future application. This is supported by the fact that the site has the involvement of a national house builder. There is therefore a realistic prospect that housing will be delivered on the site within five years therefore the site is considered to be **achievable**.
- 4.15 Consequently, the site meets the tests set out in the NPPF and the glossary and as such the proposed development is considered to be **deliverable**.
- 4.16 It is acknowledged that, notwithstanding the publication of the preferred Red Route for the relief road (which doesn't affect Thr21), the council may wish to wait until the relief road route is confirmed. This could take some time and, in that event, the site would be more likely to be a medium term (5-10 years) site. Notwithstanding this particular matter, the site is capable of delivering housing within the immediate 5 year period

Question 8 – Do you have any comments on the document and the approach used to identify potential sites?

- 4.16 Under the above question reference is made to the Technical Site Assessments which have informed the site assessment schedule in the main consultation document. In this instance the assessment for Thr21 is specifically referred to on Page 87 of the Consultation Paper.
- 4.17 It is acknowledged that the document recognises in Paragraph 4.3 that the site assessment is an iterative process and that more information on sites may be added on to the assessment after the consultation has taken place. This will be in line with NPPF Paragraph 31 which emphasises that plans should be supported by adequate and up to date evidence.
- 4.18 As stated above many of the issues affecting the site have been addressed by supporting information which was submitted in the planning application.
- 4.19 The comments in the technical assessment on the number of points of access is being addressed through current work which is ongoing. However, the matters highlighted regarding the capacity of the local road network is of concern, particularly regarding the statement which suggests that there will be a cap on development until such a time that the river crossing section of the relief road is in place.
- 4.20 The statement goes on to state that strategic sites should take preference and no further sites be considered which, with the Three Elms SUE, would breach this gap.
- 4.21 It is contended that the site at West of Huntington Lane, in being further integrated with the wider strategic allocation, can be considered as an early phase of this scheme, and that the 80 dwellings proposed would not have a major impact on the wider network if the issues discussed are resolved.

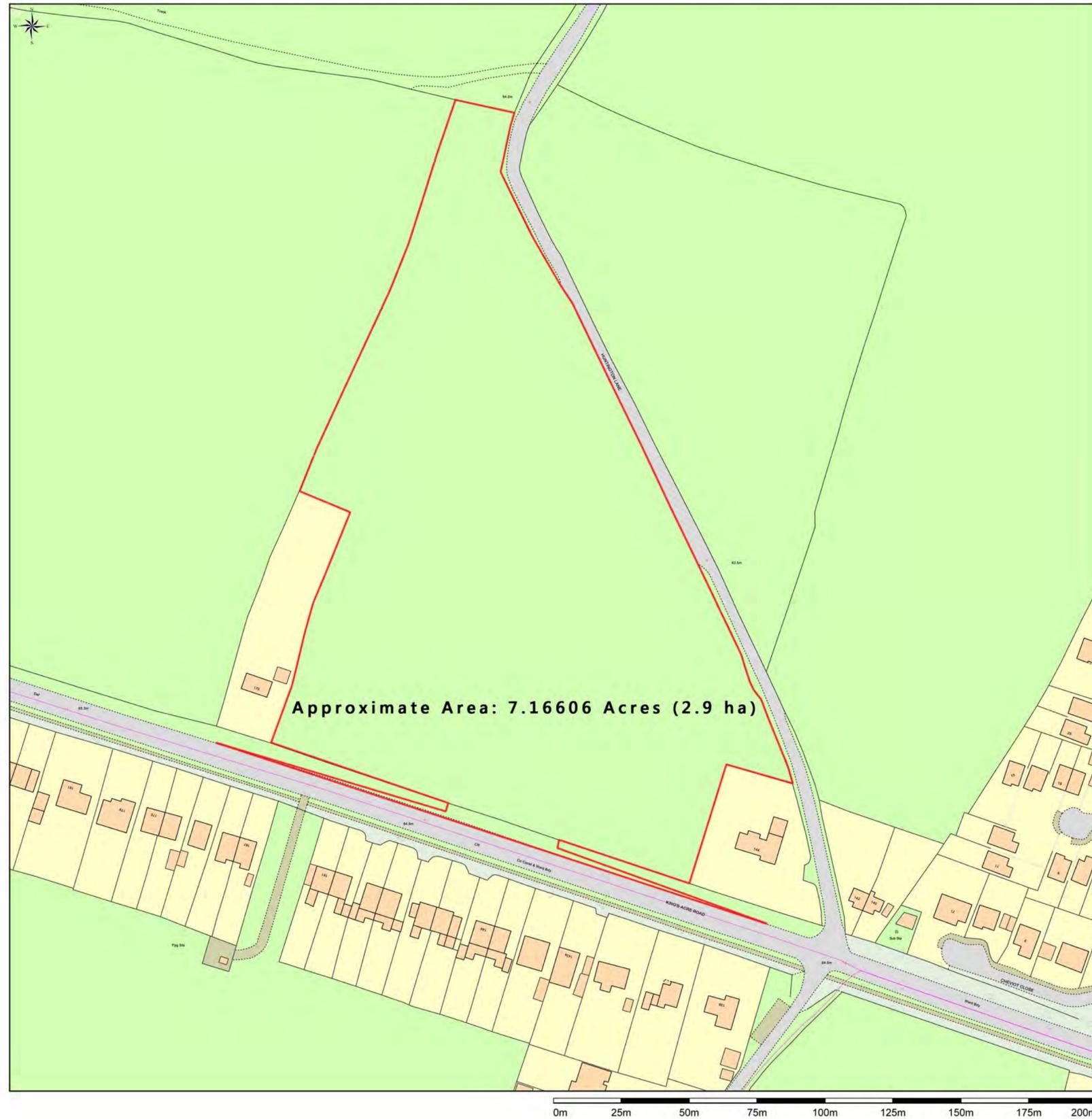
Conclusion

- 5.1 This Statement has been prepared on behalf of Taylor Wimpey plc to respond to the Housing and Employment Site Options Consultation and elaborate on the accompanying forms, with regard to land West of Huntington Lane, Three Elms Road (Thr21).
- 5.2 Reference is made to the previous outline planning application which was refused mainly on highways and access grounds, with prematurity in relation to the relief road being key. The preferred Red Route has now been published and it does not affect this site, albeit this route is not yet confirmed.
- 5.3 Work is underway to resolve the principal reasons for refusal and there is a degree of confidence that this can be achieved via the identification of a suitable point of access.
- 5.4 The Officer Report that accompanied the 2016 application confirmed that the principle of development and location of development was acceptable, notwithstanding the prematurity concerns, and the access and groundwater matters are considered resolvable.
- 5.5 It is therefore respectfully requested that Herefordshire County Council consider these representations in the light of continuing to accept the principle of development of the site, either as part of the wider strategic allocation, or as a non-strategic allocation in its own right, in the Hereford Area Plan.

Appendix 1

Hereford Area Plan Site Location Plan

Site Location Plan - Land adjacent to Kings Acre Road, Hereford



This Plan includes the following Licensed Data: OS MasterMap Colour PDF Location Plan by the Ordnance Survey National Geographic Database and incorporating surveyed revision available at the date of production. Reproduction in whole or in part is prohibited without the prior permission of Ordnance Survey. The representation of a road, track or path is no evidence of a right of way. The representation of features, as lines is no evidence of a properly boundary. © Crown copyright and database rights, 2016. Ordnance Survey 0100031673

Scale: 1:1250, paper size: A2

Latham, James

From: ldf
Sent: 27 September 2018 09:34
To: Riddle, Siobhan; Gilson, Susannah
Subject: FW: HAP vs the 2006 UDP - Request for re-protection of a specific open space in the Aylestone Conservation Area.
Attachments: Hereford (1).pdf
Follow Up Flag: Follow up
Flag Status: Flagged

From: Aylestone Conservation Area Action Group [mailto:acaag@outlook.com]
Sent: 19 September 2018 17:45
To: ldf <ldf@herefordshire.gov.uk>
Cc: Hughes, Geoff <ghughes@herefordshire.gov.uk>; Neill, Alistair <Alistair.Neill@herefordshire.gov.uk>; Singleton, Kevin <Kevin.Singleton@herefordshire.gov.uk>
Subject: HAP vs the 2006 UDP - Request for re-protection of a specific open space in the Aylestone Conservation Area.

To whom it may concern.

Ref: Regarding the current Hereford Area Plan consultation.

Dear Sir/Madam,

Thank you for your email invitations to comment or make suggestions during this HAP consultation period.

I write in this capacity as secretary for the 'Aylestone Conservation Area Action Group', the ACAAG, a formal community group which was brought about at the start of 2018, for us to eventually succeed to have a proposed 3G Floodlit Football Pitch planning application withdrawn by the applicants, one which was poised to go onto the open space playing fields of Aylestone School.

We had many discussions with Mr Singleton, Team Leader of Strategic Planning and with others as we all tried to learn about policy and rights within the planning process along the way.

Unbeknown to us, Mr Singleton informs us that we had inadvertently missed one earlier HAP consultation opportunity in 2017 to protect this open space ahead and we are advised by him that this current consultation period is the next best mechanism for this request to be listened to and considered.

The 2006 UDP map 'with key' attached, shows this playing field as being afforded protection, outlined within policy and coloured 'blue', labelled as being a 'protected open space allotment'. Look at 'the key' and then Zoom in to the words 'Aylestone Hill' and see that the whole of these playing fields up until 2015, are coloured 'blue'.

The 2015 HAP Core Strategy superseded that but we understand with Mr Singleton's guidance and advice, that it is still the aim and consideration for open space policy; especially school playing fields, to continue to weigh policy towards continuing to give similar protection.

Given this and with the recent contentious 3G challenge in mind, we aim therefore to ask specifically to re-instate the protection allotted to this playing field open space, so as to prevent any further future such development ideas which may have a similar adverse effect here and within the setting of Athelstan Hall to one corner, a Grade II Listed

building. Athelstan Hall for example has historically had its assets and so the setting of that listed building (but also other close proximity listed and other buildings) diminished by school developments over time so as to facilitate and accommodate the school playing field and with the widening of Broadlands Lane for two-way traffic and access.

As a representative of this formal and well patronised community residents group, my task is to voice this intention and to start dialogue so as to inform the HAP so that it may give protection against developments to this particular open space.

So, why is this open space so important? These playing fields in the setting of Athelstan Hall and in spite of other encroachments, are still very much a green space, open in aspect and surrounded by mature trees and hedgerow. It is part of a green infrastructure corridor with drainage naturally meandering down to the very close proximity SSSI zone that is the Lugg Meadow and so, the River Lugg. These wonderful open space playing fields are an asset to the school of course but also to the neighbouring community and to the wildlife which use it, including evidence of the Great Crested Newt, Pipistrelle and Soprano bats, foxes and other mammals with all sorts of birds including owls and buzzards. The 3G pitch application attempt mentioned above, was evidence that the local and education authority and HFA representatives did not themselves aim to afford this open space any such protection. It's a wonderful open green city space enjoyed by users, onlookers and by nature, being a special part of and adding to the character of this neighbourhood, which itself is within the 2nd oldest conservation area in the UK and within this historically landscaped setting of a listed building and so, needs specific and unquestionable protection from planning applications.

So here we all are. Whilst this consultation period is currently asking Hereford people if the proposed housing and employment potential options are suitable and also asking if there are any 'other' brown field sites to consider which may not have already been mentioned well, we are using this opportunity to also make sure; for as far into the future as is possibly practical to do so, that these open space playing fields and setting of a listed building, is protected from any more planning development, whether it be housing, for employment, even further school extensions encroaching onto it and nor any applications to even be considered without also giving full and clear public disclosure.

So, if this letter request is not be enough in itself then, where do we go from here to achieve this open space protection?

Thank you for your time, for any considerations you may give to this community objective and this committee looks forward to hearing back in due course, hopefully before it's next meeting which is to be held towards the end of September – thank you.

Kindest regards,

Padraig.

Padraig Kelly – ACAAG Secretary



Latham, James

From: ldf
Sent: 08 October 2018 08:48
To: Gilson, Susannah
Subject: FW: Tup 26

[Another rep](#)

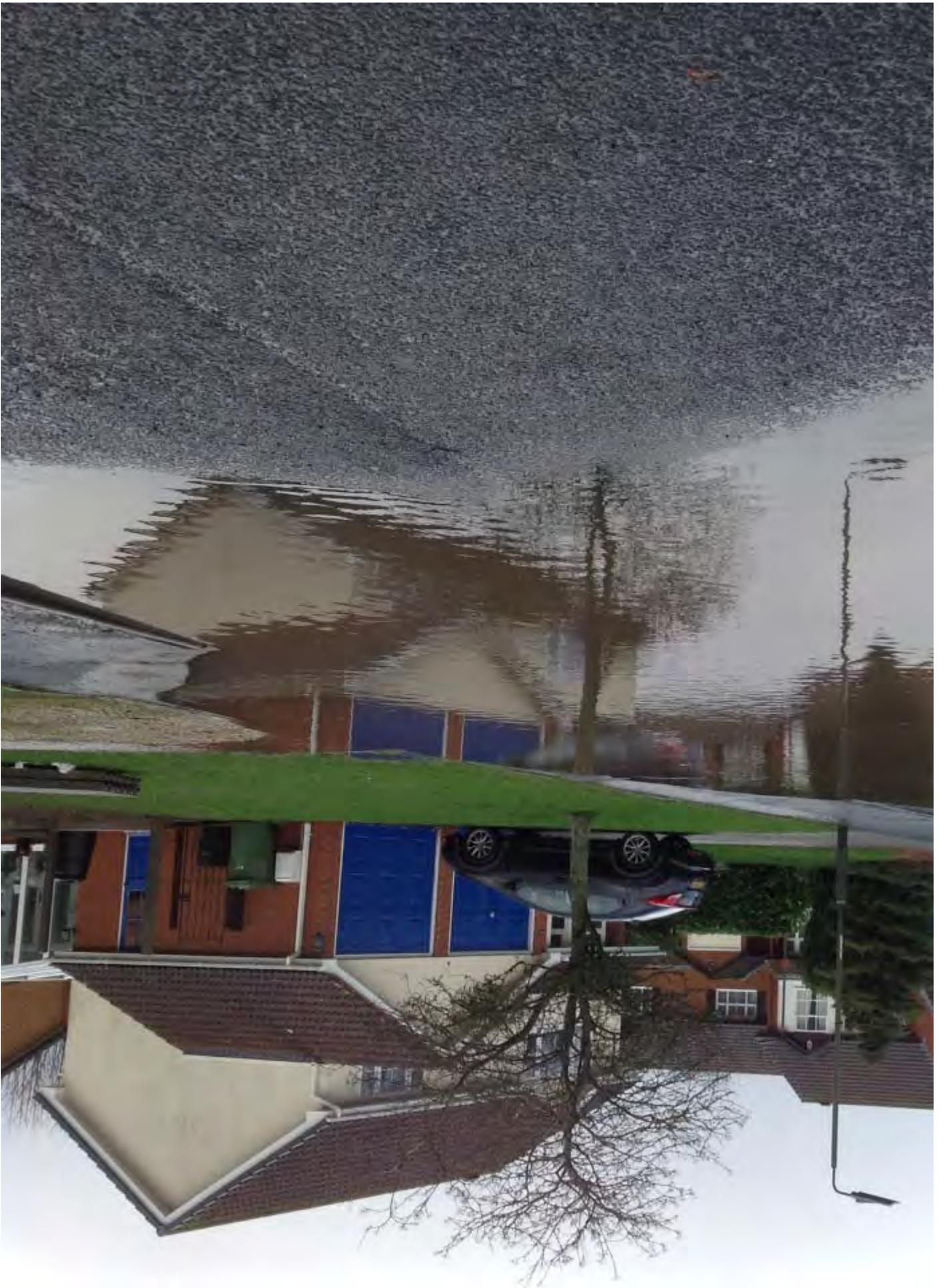
From: S Begley
Sent: 06 October 2018 20:05
To: ldf <ldf@herefordshire.gov.uk>
Subject: Tup 26

Tup 26 is unsuitable for development due to it being an important soak away for the water that runs off the higher surrounding land. The under ground brook causes flooding on this site where water bubbles out of the ground during prolonged heavy rainfall. There needs to be access across this site to enable a digger to cross the land in order to keep the conduit for the brook clear of tree roots and mud and prevent it becoming blocked, as this has happened in recent years resulting in the road flooding. I have lived in this area for over 30 years, and I am including a picture of the road flooding which was taken 3 years ago.

Mrs S Begley



Ok



Latham, James

From: ldf
Sent: 08 October 2018 08:53
To: Gilson, Susannah
Subject: FW: Hereford Area Plan Consultation

[another](#)

From: clerk@belmontrural-pc.gov.uk [mailto:clerk@belmontrural-pc.gov.uk]
Sent: 07 October 2018 18:44
To: ldf <ldf@herefordshire.gov.uk>
Subject: Hereford Area Plan Consultation

Dear Herefordshire Council

Belmont Rural Comment below

Having considered the matter the Parish Council resolved that Herefordshire consult further with their future proposals and that any developments in the Parish were in line with Belmont Rural Parish Council's Neighbourhood Development Plan

Regards
Tony Ford Parish Clerk Belmont Rural Parish Council

Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address:
www.herefordshire.gov.uk/herfordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herfordareaplan as well as at libraries and information centres across the county.

**Complete the questions for as many sites as you would like to comment on.
Please include the site reference for any you are making a specific comment on.**

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

If no, please explain:

Please see attached representations in relation to Land at Roman Road, Hereford (Ref: Bur23).

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

Please see attached representations in relation to Land at Roman Road, Hereford (Ref: Bur23).

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer:

Please see attached representations in relation to Land at Roman Road, Hereford (Ref: Bur23).

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

We have no comments.

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

We have no comments.

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

If yes, please supply site details:

We have no comments.

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

We have no comments.

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain:

Please see attached representations in relation to Land at Roman Road, Hereford (Ref: Bur23).

(Please use additional box at the back of questionnaire if you need more space to comment)

About you:

Name: Mr Michael Gooch (Boyer)

Address: Boyer, Third Floor, Park House, Greyfriars Road, Cardiff, CF10 5EA

.....

Email: michaelgooch@boyerplanning.co.uk

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (Fol) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways:
Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to:

Forward Planning
Herefordshire Council Offices
Plough Lane
Hereford
HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Question 8 continued...

Representations in relation to Land at Roman Road, Hereford

1. Land at Roman Road consists of approximately 8.8 acres (3.5 hectares) of land to the north of Roman Road (A4103) at the north-eastern edge of Hereford. There are a significant number of residential properties both north and south of Roman Road, together with a recently completed development of around 300 dwellings at Meadows Edge to the west of the site. A railway line forms the lies just to the east of the site. Currently, the site is used occasionally for car boot sales events.
2. As part of the Housing Topic Paper prepared in April 2017 to support preparation of the HAP, the site originally included within the Housing and Economic Land Availability Assessment (HELAA) (HELAA Refs: Bur23) was assessed as having no significant environmental constraints and was therefore suitable for further assessment.

Site Options Technical Assessment

3. The HAP discounts the site (in addition to several other sites at the north-eastern edge of Hereford) due to the presence of an indicative route corridor for the final phase of the Hereford Northern Bypass/Relief Road, provided for by the Hereford Core Strategy.
4. Due to the site's location partially within the indicative road corridor, the HAP report considers that it *"would be premature to provide an assessment of site potential where a road route is expected to be accommodated beforehand."* Although the prematurity argument can be a relevant consideration in terms of established planning law, policy and practice, it is still felt to be unreasonable for the LPA to refuse to assess a site's suitability for residential development due to such an indicative Core Strategy policy, the delivery of which is inherently uncertain. This could therefore potentially render the HAP as unsound and legally non-compliant.
5. There is no policy within the adopted Core Strategy prohibiting development anywhere within the identified road corridor which, in any case, is highly indicative. In this regard, the HAP states that *"No route alignment work has been carried out on this section of the road as the Hereford Transport Package work currently focuses on the route section going from the A49 south [sic] of the city to the A49 north of the city."*
6. However, although the current focus is on delivery the western section of the relief road, the Hereford Relief Road Study of Options report published by the Council in September 2010 in fact identifies *two* potential routes (as well as the relief road corridor) for the road within the northern road corridor (Refs: NC3 and NC4), which are illustrated on maps A3.19 and A3.20 of the report and reproduced here at Appendix 1. The report also contains detailed engineering and financial assessments of both routes, a summary of which is reproduced at Appendix 2.
7. Moreover, the summary of the Link and Alignment Assessment Recommendations set out in Table 5.1 of the Study of Options report states that: *"NC4 also allows for additional development land in the on [sic] of the Key development Zones identified by the LDF development work. The selection of a favoured route is therefore likely to relate to the allocation of development land and as such this report does not make a recommendation and suggests both routes are taken forward for further consideration."* This position clearly conflicts with the HAP technical assessment, which appears to indicate that a preferred route should be identified *before* further allocations.

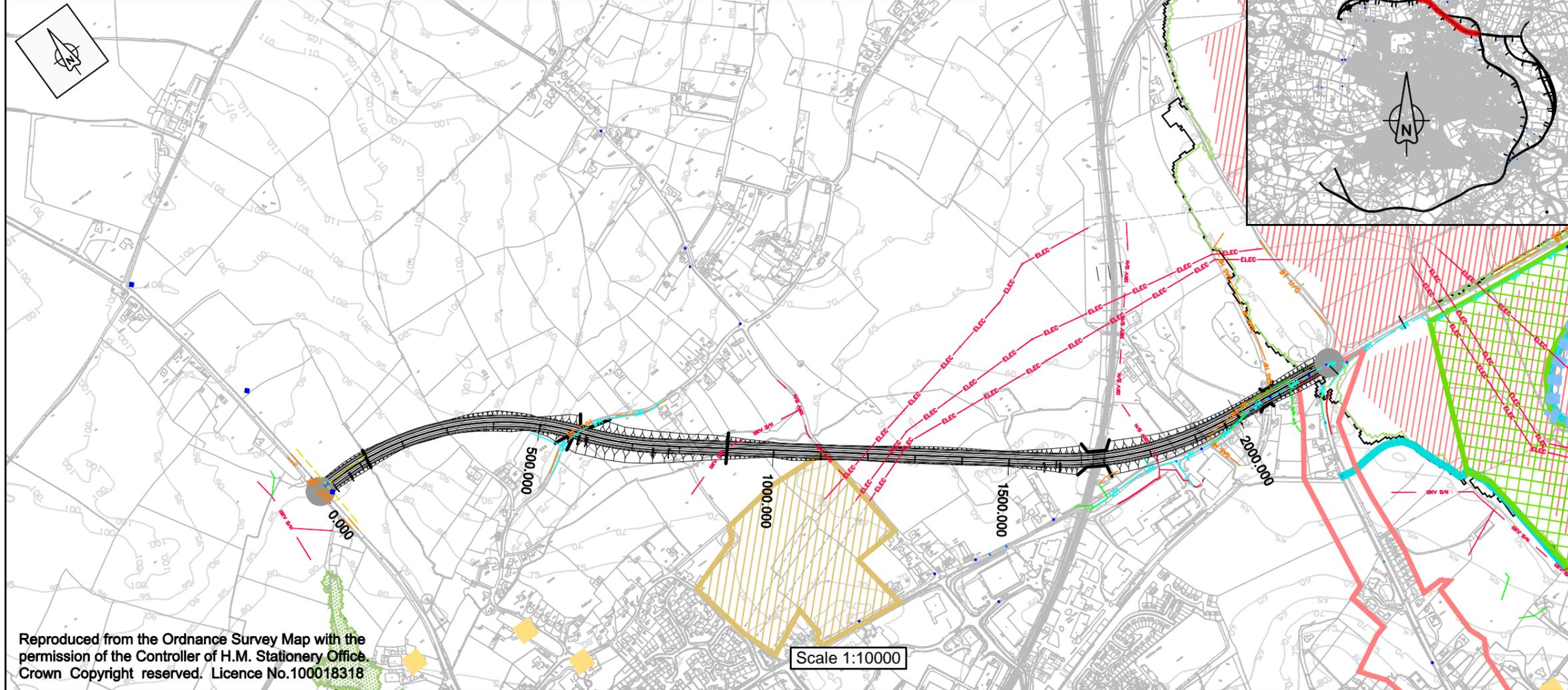
8. Notwithstanding the above, it is clear from maps A3.19 and A3.20 that neither potential route would prohibit development from coming forward at Roman Road, while the potential allocation of the site would not prejudice the future selection of a preferred northern route for the relief road. It is therefore considered that it is neither appropriate nor justified for the site to be discounted for inclusion within the next stage of the HAP without a thorough and robust assessment of suitability, as has been afforded to HELAA sites within the western relief road corridor.
9. In any case, it is also noted that several HELAA sites, in addition to the existing Three Elms allocation, located within the western relief road corridor that have not been discounted and are proposed to be taken forward as potential sites. This is despite the fact that there are seven potential routes for the western bypass and, although the Council has chosen a preferred route, no formal decision has yet been made regarding the final route.
10. Given the locations of the various western route options, the sites taken forward as potential housing sites could clearly impact on the ability to deliver several of the route options. It is therefore inappropriate and unjustified to discount Land at Roman Road due to potentially prejudicing decisions regarding the final route of the relief road, whilst simultaneously considering other sites within the western relief road corridor as potentially suitable.

Suitability of Land at Roman Road, Hereford

11. Aside from the above, which demonstrates that the current lack of any robust assessment within the HAP of the site's suitability for development, it is considered that there are a number of positive factors that weigh in favour of the site's allocation for new residential development.
12. Firstly, the site is immediately adjacent to the existing urban edge of Hereford, which has already seen a large degree of change in recent times with new development taking place immediately to the west of the site and the adjoining rural lane. There are also several existing, residential properties along Roman Road, to the south of which is a large industrial estate comprising several important industrial and commercial units. There is also an existing railway line just to the east.
13. In this regard, the Herefordshire Urban Fringe Sensitivity Analysis Report (2010) identified the site as having a 'medium-low' landscape sensitivity (Ref: 2A: Holemer-Shelwick). The report added that the character of the landscape had been degraded by intensive agricultural use, as well as the presence of existing development, overhead power lines and the railway line. The area was therefore found to have a 'semi-urban' rather than 'rural' character due to the following reasons, *inter alia*:
 - "Close visual relationship to the Roman Road Corridor and to Hereford...;
 - Lack of visual cohesion – the railway line forms a visual and physical barrier...; and
 - Lack of tranquility."
14. Furthermore, the HELAA (2015) considered the site to have between 'medium' and 'high' suitability for either residential or employment development with "*no significant environmental constraints to development.*" We concur with these conclusions, which are considered to remain valid given the completion of the allocated site to the west.
15. In addition to the lack of any significant, adverse landscape or other environmental impacts, the

site is considered to represent a highly sustainable location for new residential development due to the proximity of existing, local facilities and employment opportunities at the industrial estate to the south of Roman Road. Aydon Industrial Park and Spur Retail Park are also situated just to the south-west and include many large employers and retail outlets.

16. There is also an existing bus route along Roman Road and Old School Lane, around 400m to the south-west. In conjunction with contributions received as part of the neighboring development, there is also be the potential to expand the bus route further to the east along Roman Road and then south via College Road.
17. Bearing in mind the socio-economic vision to provide a northern relief road for Hereford, there is also considered to be a good opportunity to provide an attractive 'rounding-off' to the north-eastern edge of Hereford with improved, 'soft' natural landscaping, which could subsequently act as an appropriate buffer to the final route of the relief road.
18. Consequently, it is therefore considered that the site represents a logical opportunity to provide a significant contribution towards Hereford's housing needs over the remainder of the plan period and beyond at a highly sustainable location, which would visually integrate with the existing urban area without compromising the future provision of a northern relief road.



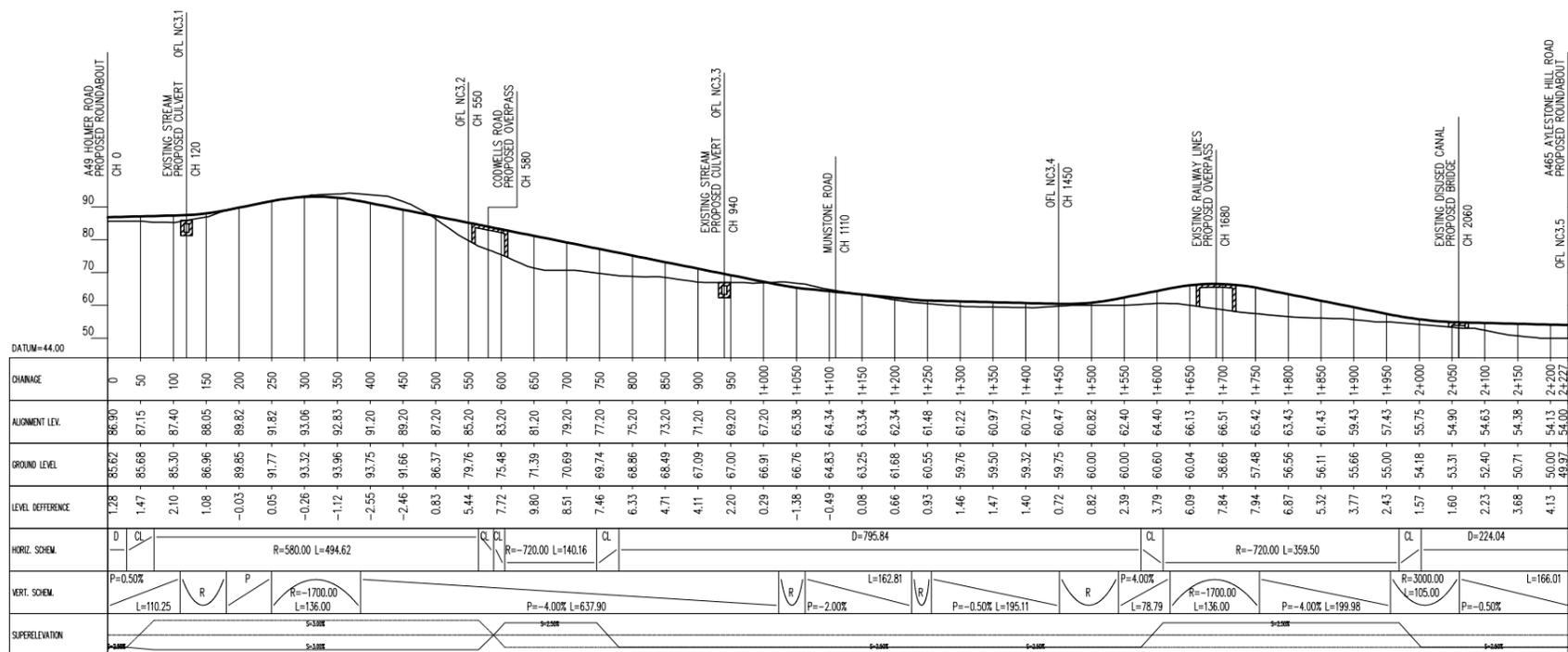
Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office. Crown Copyright reserved. Licence No.100018318

Scale 1:10000

NOTES

	Historic flood map		Ancient Monument
	Area benefiting from flood defences		Historic Parks and Gardens
	Greater than 0.1% flood risk from river / sea (floodzone 2)		UDP Proposed Housing Site
	Greater than 1.0% flood risk from river or 0.5% flood risk from sea (floodzone 3)		Land Use (as annotated)
	Source Protection Zone 1 (inner zone)		Listed building
	Source Protection Zone 2 (outer zone)		Roundabout
	Source Protection Zone 3 (total catchment)		Severance
	Flood defences		BT Underground
	Surface Water Course (with flow direction)		CS - WW - Combined Sewerage
	Ancient Woodland		CS - WW - Existing Trunk Water Main
	Special Area of Conservation (SAC)		CS - WW - Existing Water Main
	Site of Special Scientific Interest (SSSI)		CS - WW - Foul Sewerage
	Conservation Areas		CS - WW - Pumped Foul Sewerage
	Special Wildlife Site (SWS)		CS - WW - MP Mains
	Roundabout		BT Overhead
	Severance		BT Overhead
	E-On 11kv PVC Cable		CS - WW - Combined Sewerage
	E-On 66kv Overhead Cable		CS - WW - Existing Trunk Water Main
	E-On LV Overhead Cable		CS - WW - Existing Water Main
	Gas - LHP Mains		CS - WW - Foul Sewerage
	Gas - LP Mains		CS - WW - MP Mains
	Gas - MP Mains		BT Overhead
	BT Underground		BT Overhead
	BT Overhead		CS - WW - Combined Sewerage
	CS - WW - Combined Sewerage		CS - WW - Existing Trunk Water Main
	CS - WW - Existing Trunk Water Main		CS - WW - Existing Water Main
	CS - WW - Existing Water Main		CS - WW - Foul Sewerage
	CS - WW - Foul Sewerage		CS - WW - MP Mains
	CS - WW - MP Mains		BT Overhead
	BT Overhead		BT Overhead

A	Listed buildings added	SD	RM	21.09.10
Rev	Revision details	Chkd	Appd	Date



Scale 1:10000/2000

Drawn: E.JL	Preliminary	<input checked="" type="checkbox"/>
Design: JRP	For comment	<input type="checkbox"/>
Chkd: SD	For tender	<input type="checkbox"/>
Appd: RM	For construction	<input type="checkbox"/>
Date: June 2010	As constructed	<input type="checkbox"/>
	Other	<input type="checkbox"/>

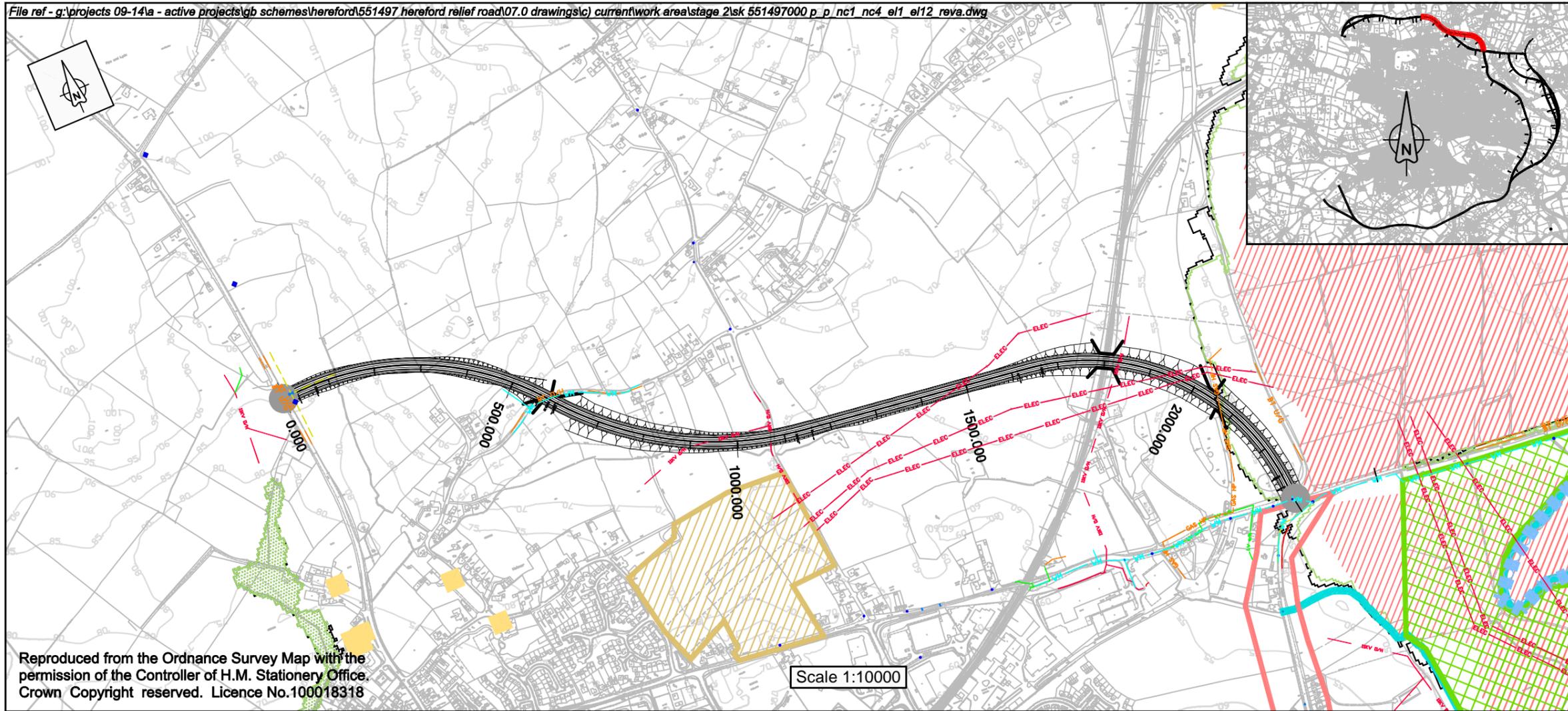


Client
M. HAINGE
DIRECTOR of ENVIRONMENT & CULTURE
Herefordshire Council
Brookington, 35 Halold Road, Hereford, HR1 1SH Tel: (01432) 260780 Fax: (01432) 261983

Project Name
Hereford Relief Road

Drawing Title
**Northern Core 3
Sheet 19 of 32**

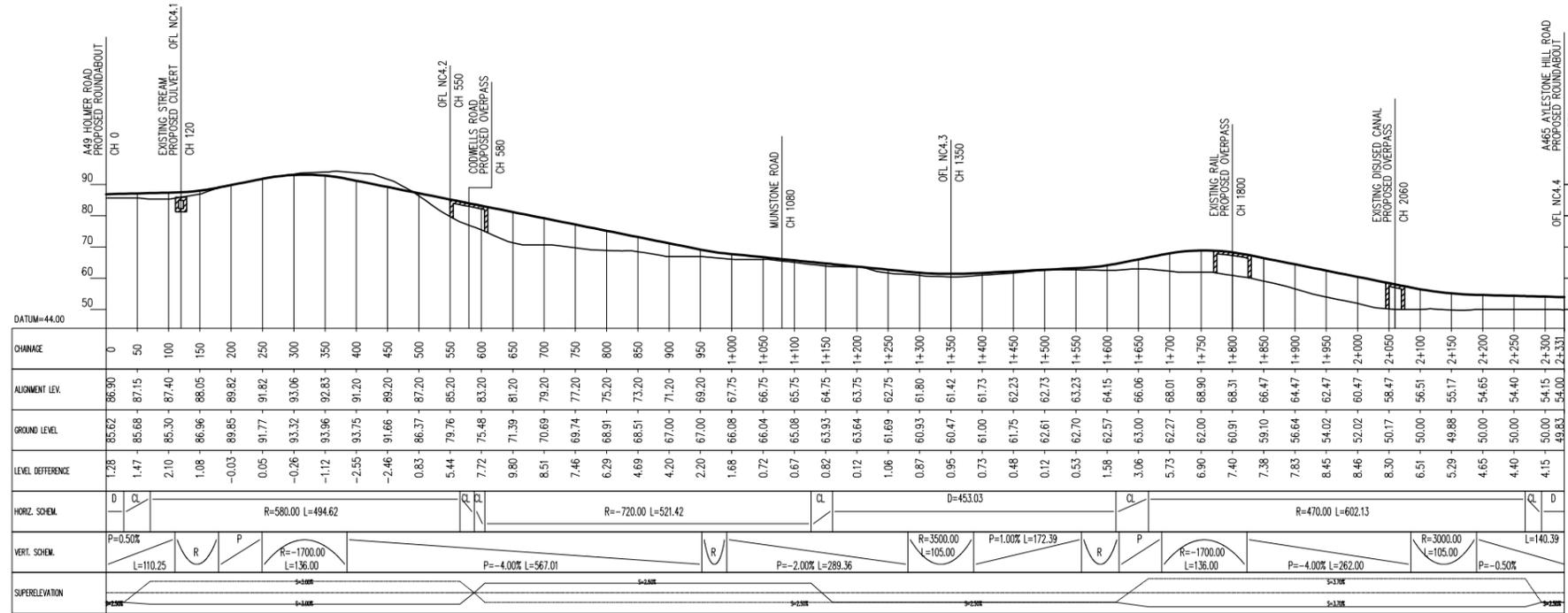
Original Drawing Size : A3	Scale : As Shown	Dimensions : -
Drawing No 551497-H-P-A3.19	Map No A3.19	Rev A



Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office. Crown Copyright reserved. Licence No.100018318

Scale 1:10000

NOTES	
	Historic flood map
	Area benefiting from flood defences
	Greater than 0.1% flood risk from river / sea (floodzone 2)
	Greater than 1.0% flood risk from river or 0.5% flood risk from sea (floodzone 3)
	Source Protection Zone 1 (inner zone)
	Source Protection Zone 2 (outer zone)
	Source Protection Zone 3 (total catchment)
	Flood defences
	Surface Water Course (with flow direction)
	Ancient Woodland
	Special Area of Conservation (SAC)
	Site of Special Scientific Interest (SSSI)
	Conservation Areas
	Special Wildlife Site (SWS)
	Roundabout
	Severance
	Ancient Monument
	Historic Parks and Gardens
	UDP Proposed Housing Site
	Land Use (as annotated)
	Listed building
	Bridge
	Culvert
	Proposed Traffic Signals
	E-On 11kv PVC Cable
	E-On 66kv Overhead Cable
	E-On LV Overhead Cable
	Gas - LHP Mains
	Gas - LP Mains
	Gas - MP Mains
	BT Underground
	BT Overhead
	CS - WW - Combined Sewerage
	WW - Existing Trunk Water Main
	WW - Existing Water Main
	WW - Foul Sewerage
	WW - Pumped Foul Sewerage



HEREFORD
SCALE: 1:5000/1000(A1), 1:10000/2000(A3)

Scale 1:10000/2000

Rev	Listed buildings added	SD	RM	21.09.10
A	Listed buildings added	Chkd	Appd	Date

Drawn: E.JL	Preliminary	<input checked="" type="checkbox"/>
Design: JRP	For comment	<input type="checkbox"/>
Chkd: SD	For tender	<input type="checkbox"/>
Appd: RM	For construction	<input type="checkbox"/>
Date: June 2010	As constructed	<input type="checkbox"/>
	Other	<input type="checkbox"/>



Client
M. HAINGE
DIRECTOR of ENVIRONMENT & CULTURE



Brookington, 35 Halford Road, Hereford, HR1 1SH Tel: (01432) 260780 Fax: (01432) 261983

Project Name
Hereford Relief Road

Drawing Title
**Northern Core 4
Sheet 20 of 32**

Original Drawing Size : A3	Scale : As Shown	Dimensions : Metres
Drawing No 551497-H-P-A3.20	Map No A3.20	Rev A

Breinton Parish Council

8 October 2018

FINAL SUBMITTED VERSION

Dear Sirs,

Breinton Parish Council (referred to as 'We', 'Our' or the Parish Council throughout the rest of this document) welcomes the opportunity to comment on the Hereford Area Plan (HAP) Housing and Employment Site Options. We will focus on the sites – both housing and employment - that may impact upon Breinton parish and its residents, primarily those adjacent to the parish boundary in the Belmont Rural, Greyfriars, Kings Acre and Whitecross wards of Hereford city.

1. General points

Before we start on the site specific detail there are a number of general points to make.

1. We note that the consultation document says that the green shaded sites have housing potential but that there may still be 'is SUEs' to resolve. We would have thought that 'is SUEs' relating to the green shaded sites would be explored in some detail, if not finally resolved, before the HAP is approved, given the lengthy delays experienced in bringing the 3 Elms Strategic Urban Expansion (SUE) to the Planning Committee because basic 'is SUEs' were not resolved prior to it being included in the Core Strategy. If the 'is SUEs' are not clear and a probable solution identified then the HAP is not a sensible vehicle to deliver the Core Strategy housing numbers on time. In particular
 - a. Flood risk assessments (your 3.2) should be completed before decisions are made on sites or combinations of sites. Neither is it sufficient for these to simply identify 'is SUEs'; if a site is to be considered as truly deliverable the assessment should identify what needs to be done. The same applies to the detailed flood modelling (your 5.14) which should include overland flows as well as floods from rivers, streams and culverts
 - b. The further work to model possible traffic impacts of the potential site options is essential particularly to identify the cumulative impacts of sites in the NW quadrant of Hereford (your 3.6 and 5.2) before they are included in the HAP
 - c. Mitigation measures for any highways impacts for these sites, or groups of sites should be ascertained before they are included in the HAP (your 4.4)
2. We are concerned that there may be moves to reduce the commitment to the Urban Village meaning that other housing sites may be required. We note that at April 2017, after commitments and completions were allowed a further 448 units needed to be committed/delivered in order to reach the 800 Core Strategy number. Your consultation

paper says that there is a possibility of approvals for other uses. The table in Appendix 3 of the consultation document says that the Cen21 sites have an assessed capacity of only 300 but Cen21 is the only central site assessed at the mid- point density of 50 units per hectare(dph.) rather than the upper 70dph. Even 70dph only produces 400 units – still well below the 448 needed. Finally the site summary itself for Cen21 says ‘these sites together have capacity to accommodate some but not all of the 800 dwellings and estimates of housing capacity are an approximation’. Even the wording differences between Core Strategy Policies H1 (800) and H2 (around 800 new homes, the majority within a new urban village) cannot totally remove this discrepancy. What happens if a SUE fails to deliver the numbers required?

3. The site option summaries are in our view inconsistent, unclear, lack precision, are potentially misleading and are in some cases incorrect. We will make these points clear site by site. We also expect that when different forms of words are used to explain the same SUEs’ throughout the documents that these reflect actual differences between the sites being assessed rather than different authors, poor editing etc. Unless consistent wording is applied the strengths/weaknesses of individual sites cannot be accurately compared. There is a lack of editorial/quality control by the authors indicative of documents whose publication has been unduly rushed. The technical summaries are also difficult to interpret in some cases, especially the tables, without knowing the guidance for what should go in each box. For instance what does an entry under ‘surface water’ in the environmental designation section mean? Additional explanatory notes for Appendix 1 of the consultation document that gives the template for the technical summary could be useful in future consultations.
4. There is a casual disregard for the quality of the agricultural land under consideration and whose productivity may be lost to future generations if all of the proposal are accepted. While such losses are dismissed as inevitable by the consultation document we do not believe they are necessary and our comment above on the potential reduction in housing in the urban village is relevant here since this may increase pressure to find replacement capacity/other additional sites. We note that para 170a of the 2018 NPPF says that ‘planning policies.....should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.....and soilsin a manner commensurate with their statutory status’ while para 170b specifically refers to the best and most versatile soils which all the sites we include in our comments are, part from Bel08.
5. The consultation document says that mitigation measures for the highways impacts have yet to be ascertained. This is unacceptable given the scale of potential housing and industrial for growth to the north and west of Hereford. We will turn time and time again in the individual site specific comments that follow in the rest of this document to SUEs’ such as the need to minimise the number of additional road junctions on Kings Acre Road. There is also an absolute imperative for a strategic transport assessment covering the whole north-west quadrant of Hereford to assess the traffic implications from all these sites on the routes in and out of the city. A whole corridor approach is needed to cover all the impacts and not just those of the potential bypass.
6. We believe that the impact of developing the sites we highlight below will have much wider implications for the city and county as a whole and do not feel that they should be developed individually, in isolation or in a piecemeal fashion. Their relationship to each other, interfaces with the surrounding wards, the lack of non-car links to other parts of the

city (especially the centre, hospital and railway station) and impact on approximately 25% of the existing population of the city as a whole all need careful consideration, explanation and consultation. The two SUE's locally are expected to provide a minimum of 1700 new homes by 2031. The seven sites we address below have a minimum assessed capacity of 1590 additional homes between them and a maximum of over 2750. Thus the north-west quadrant of the city could, conceivably be expected to accommodate 4450 (68%) of the total of 6500 homes expected by 2031. It is not adequate to say that the proposed western bypass will address these is SUEs'. What is needed is a master plan for the whole northwest section of the Hereford and its surrounding parishes before these sites are considered for development.

7. The 6500 homes for the city (part of the 16500 for the county) were already inflated from the Objectively Assessed Need of 14200 for Herefordshire at the time of the Core Strategy's adoption in 2015. With the Core Strategy due for revision in 2019, the recent changes to the NPPF/NPPG and the current vacuum from central government on updating ONS figures; the local housing need numbers are more likely to be reduced than increased in future so final site identification should err on the cautious side. We note that paragraph 31 of the 2018 NPPF says that 'preparation and review of all policies should be underpinned by relevant and up-to-date evidence'. This is most certainly no longer the case with the Core Strategy or with the proposed Hereford Area Plan.
8. We believe that there is a significant issue about the deliverability of all of these sites by 2031 especially if they are all programmed for the last year of the HAP time frame. Exploring the 'is SUEs' to resolve' referred to earlier may render them unsuitable or unavailable but achievability is another thing. It is not simply a judgement about economic viability as para 4.9 of your consultation document says (although so many new houses potentially on the market in the NW sector of Hereford at the same time may not be commercially attractive) but also one of practicality and the lack of time left before 2031 once the SUEs' positions are resolved and 'caps' removed (or not) by infrastructure being delivered on time. We do not understand the various references within the site summaries to 'caps' on housing numbers and this lack of clarity is explained in Cre25/7 below.
9. It is not sensible to ignore the potential contribution sites identified in the NE quadrant of Hereford city because no route alignment work has been carried out on this section of the proposed Hereford bypass. This is wrong and inconsistent with the approach taken at 3 Elms. Here work proceeded, including public consultations, when only the route corridor was known from the Core Strategy and there was presumably no knowledge of the route options or that the red route might eventually be favoured. To ignore these sites at this stage means that there is a bias of development over the next decade towards sites in the other three quadrants principally the NW.

2. Site specific comments – Kings Acre Road

In addition to the city wide implications alluded to above; there are seven sites that would have an impact on either the King's Acre Road or the Adams Hill parts of Breinton Parish were they to be adopted in the HAP and eventually developed. Our comments are based primarily on the site and technical summaries. The volume of paperwork has not allowed us to consider the various environmental appraisals in any detail but we may comment on these in future.

CRE 25 – Wyevale nurseries

1. The use of this site for housing would inevitably mean the loss of permanent employment opportunities
2. We note that unlike most of the sites considered below (where the existence of mineral reserves is dismissed) the British Geological Survey confirms that there are mineral reserves here but the technical and site summaries say that 'due to its location close to Hereford extraction would not be sought here' We are aware that Stretton Sugwas quarry was closed some years ago on environmental grounds. Minimising the distance aggregates are carried should be a consideration for the HAP and given the amount of potential development in the NW area – indeed in Hereford as a whole over the next 13 years - we are surprised that there is no indication anywhere in the consultation documents of where aggregates will be sourced and the distances to be travelled. This is particularly important as a replacement minerals and waste local plan is still awaited. At the time the Core Strategy was approved undertakings were given that this would be available for examination in 2016.
3. We note that the site is Grade 2 agricultural land 'very good quality'. Our comment at 1.4 is particularly relevant here especially given the 2018 revision to the NPPF
4. It is unclear what is meant by the statement that 'the remaining land is generally open countryside' or that it increases the accuracy of site comparisons. Actually the vast majority of the site is open; as the summary says 'mainly used as a growing area'.
5. There are apparently no significant landscape constraints to development yet the retaining the existing perimeter vegetation is considered key for this site. These two points are inconsistent. A consistent approach to screening is required to all sites in the area which is largely flat but highly visible from vantage points such Credenhill. The landscape effects would be particularly noticeable given the potential scale of development if the adjacent sites Thr19 and Thr35 (which could proceed independently) were to be merged with this one. The adopted Breinton NDP policy B16 identifies a number of important views for protection including the landscape currently to be observed from Breinton Ridge. These would all be adversely affected by development of sites such as these as would a number of views from other locations. Para 170a of the 2018 NPPF talks about protecting and enhancing valued landscapes.....in a manner commensurate with their statutory status . These views are from a number of the designated local green spaces in north Breinton as described in policy B9 on the NDP.
Contrary to the site summary, this site certainly should not come forward in isolation.
6. There is mention of potential improvements to the current junction between the A480 and A438. This is something that the Parish Council has campaigned for repeatedly and is on our S106 'wish list'. To date our concerns have been dismissed. However rather than following the site summary's observations; we feel that a totally new roundabout junction slightly to the west of Kings Acre Halt would be infinitely better given visibility, current speed limits and bends on the existing roads. Fundamental improvement would be essential if other sites in the area e.g. Thr35 were also to be considered for development. Access via Thr19 or by modifications to the existing business park access onto the A480 are not acceptable

7. The meaning of the 'proposed' cap on housing numbers on the SUEs' (until such time as the river crossing section of the proposed relief road is in place) is unclear as is the actual impact of preference being given to the strategic sites on other sites under consideration.
 - a. First surely the cap is enforceable? It is part of MM018 of the Public Inquiry into the Core Strategy and is contained in Appendix 5 to the adopted Core Strategy documents that sets out the relationship of infrastructure development and the SUEs'
 - b. Secondly as we understand it there are a number of 'caps'. First there is a limit of 2400 new homes in Hereford to 2020 unless the NMP succeeds in reducing phosphate levels in the Wye catchment which the various summaries ignore. This cap rises to 3250 by 2022 assuming that both the Southern Link Road and the river crossing mentioned above are completed. The cap rises still further by 2025 if improvements are made to water treatment and supply capacity and by 2027 if the rest of the proposed bypass to the A49 is completed. There are individual caps to each SUE presumably within the Hereford wide cap.
 - c. The two that are most relevant to Breinton are 3 Elms (580/1000 by 2022) and Holmer West (300/500 by 2022). Are the site summaries really saying that none of the green shaded sites being considered for inclusion in the HAP cannot be developed until the strategic sites reach their caps? There appears to us to be more than sufficient headroom within the Hereford wide cap for all four SUEs' to reach their individual cap, for there to be background growth and some of the sites under consideration to come forward. It does not appear possible to prevent this. If they are prevented then the homes apparently required will simply not be provided within the desired timescales despite sites being potentially available.
8. What is meant by the phrase 'the scope and developments to be considered will need to be confirmed'? (NB this comment also applies to Thr19 and possibly other sites)
9. We agree that a transport assessment is required but, as we say in our general opening comments this should not be confined just to this site but to the whole north-western segment of the city and the routes in and out of the city it contains. To say that the Hereford Transport Package (HTP) may provide additional network capacity once completed completely misses the point. The HTP proposes a bypass not additional capacity of use to NW Hereford residents trying to get to local services
10. Contrary to the site summary, there is no 'urban form' to this area of the city. The Parish Council objects most strongly to this assertion. Even if the site were developed eventually it would be an outer suburb of Hereford i.e. suburban. The comment about urban form is even more difficult to understand since the site description includes the phrases 'mainly a growing area...open countryside to the east... remaining land is generally open countryside' that contradict the idea of an urban form. We need to plan the fringes of Hereford city and its relationship with the surrounding countryside very carefully and the indiscriminate use of terms like urban does not inspire confidence that this is currently the case particularly as the word urban is not used in connection with other, adjacent sites. Our general comments about the need for a masterplan for the north-west segment of the city apply here
11. The public transport comments in the technical summary make it very clear that this site is not sustainable development with poor access currently by anything other than by car. This

uncomfortable fact is not included in the site summary. This site will require significant investment in active travel infrastructure for it to be sustainable

Thr19 – Land opposite Conifer Walk

1. This site is described as open countryside as should the site above (see Cre25/4 and Cre 25/10)
2. Reference is made to ‘ribbon development’ along the roadside to the south of the site. This is actually on the opposite side of the Kings Acre Road to the site and is a form of development that the adopted Breinton Neighbourhood Development Plan which covers the area seeks to minimise in future. (Policy B2). Any development of this site in the future should not add more of this undesirable suburban feature to what already exists in the area
3. This site is also Grade 2 agricultural land (of very good quality like Cre25 and other sites) but, inconsistently there is no mention of mineral reserves even to dismiss their existence/use
4. From a landscape perspective this site is considered unacceptable if it was to be developed on its own and very strong reasons are given in the technical summary – ‘no logic to development on this site.....no possible mitigation for the harm caused.....extensive boundary planting would be required to assist in screening’

The Parish Council would point out that even with screening this site – and many others under consideration to the west of Hereford – would be hugely visible from the surrounding higher vantage points including Credenhill and the former drove road along the Breinton ridge. The adopted Breinton NDP policy B16 identifies a number of important views for protection including the landscape currently to be observed from Breinton Ridge. These would all be adversely affected by development of sites such as these as would a number of views from other locations. See also Cre25/5

Large scale development here on top of what is already proposed for the Three Elms strategic urban extension (SUE) would have a cumulative and significant impact on the current landscape whatever local screening was involved. Destroyed would be more accurate. However; without any documented support the technical summary’s conclusions (which are carried forward as the site summary) speculates that the natural environment will be altered by the nearby SUE and planned western bypass and suggests that this site should be considered in that context. It is not inevitable that the natural environment is altered and a supposedly balanced assessment should not fly hypothetical kites.

5. There is mention of the ‘nearby strategic site’ which is either irrelevant or should be made in relation to Cre25 as well as other sites along Kings Acre Road
6. A full assessment and field evaluation of the potential for significant archaeology is considered essential by the Parish Council – see also Thr21/6
7. There is reference to the (road) junction format dictating if third party land is required. The meaning of this is unclear particularly as the site could be self-contained. The summary goes onto say that ‘junction spacing may potentially be an issue’. It certainly will be given the number of potential housing sites under consideration to the west of Hereford for inclusion in the HAP. The parish council objected most strongly to an excessive number of junctions along the Kings Acre Road in its representations on the proposed 3 Elms development (Ref P162820/F). At that stage only one of the sites being considered here for inclusion in the HAP, the proposed western bypass and the 3 Elms SUE were being considered. Now many more sites are possible locally along King’s Acre Road. If development proceeds on any of

these only the minimum number of junctions should be allowed. Each additional junction will disrupt traffic flow still further, increase risks to pedestrians and cyclists as well as the danger of additional accidents. Estate access points should be combined. There are only two major junctions on the Belmont Road between Asda and Tesco and their impact on disrupting traffic flows is plain to see. This kind of disruption should not be increased along Kings Acre Road by planning each site in isolation.

8. Our opening general comments on the need for a strategic transport assessment (also in Cre25/9) and on the relevance of a cap on site by site housing development (Cre25/7) are also relevant to this site
9. Our question in Cre25/8 also applies to this site
10. There are areas of medium to high flood risk on this site identified by the Environment Agencies (EA) maps of overland flows. They are ignored in the various summaries and will need to be managed carefully if the site is ever developed especially to avoid increasing flood risk down-stream at the 3 Elms SUE and further into the city centre. The flood risk assessments apparently commissioned by Herefordshire Council/EA should confirm these risks and should be reach conclusions on any necessary investment before this site is carried forward into the HAP

Thr 21 – Land west of Huntington Lane

1. Our comments on minimising the number site accesses/road junctions (Thr19/7) are relevant here and are not repeated. Additionally however separate access to this site and the adjacent Thr22 would have particularly detrimental impacts on the avenue of lime trees along the A438. While a tree lined road is at least mentioned in the site summary it singularly underplays their local and city wide significance. It fails to mention that these trees are worthy individually of protection orders and collectively form a very distinctive and unique feature of the Hereford city street-scene. The cohesive avenue of trees is already under threat from both the proposed 3 Elms access road and the preferred red route for the proposed western bypass. If these were to proceed they would together remove at least ten of the sixty plus trees in the avenue, effectively destroying a significant landscape feature to the west of Hereford. Thr21 and Thr22 must not be allowed to do even more damage. The Parish Council agrees with the site summary that access can only be via 3 Elms.
2. This site is correctly described as open countryside (unlike Cre25)
3. As a large part of the SUE at 3 Elms lies west as well as east and north of this site, shouldn't the site summary also say east of the SUE at 3 Elms and not just west?
4. Like Cre25 and Thr19, this site is also Grade 2 agricultural land but the summary does not say that this is very good quality which should be mentioned in every case. This is inconsistent
5. The summary refers to the impact on the Huntington conservation area to the north. This is largely irrelevant. This site is completely bounded by trees – which are not mentioned apart from those at the main road side – and an ancient hedgerow already providing more than adequate screening, In addition any impact on the conservation areas would be minor compared to that of the 3 Elms SUE which completely surrounds it. The 3 Elms mitigation measures should include any additional impacts of this site if any additional ones exist We agree with the landscape comments that 'development in its current state would be wholly incongruous and harmful to Huntington Lane through the loss of vegetation to facilitate. It makes no sense currently '

6. Breinton Parish Council agrees that archaeology on this site and Thr19 could be important but considers that this should be assessed and investigated prior to the granting of any planning permissions. It is not something to be mitigated for in retrospective once approval has been granted
7. This site is acknowledged as being in the source protection zone (SPZ). In fact it covers part of the innermost (red, 1) zone and the outer (green, 2) zone. Any study of this, and any subsequent work required to prevent harm from the development on this site, should be included in the studies already underway to assess the impact of the 3 Elms SUE on the SPZ in order that all sites are considered at once and sufficient capacity and assurance is provided to eliminate any/all adverse effects. This is another example of how sites along King's Acre Road should be considered together and not individually, potentially as part of a masterplan for the north-west of Hereford as we suggest in our opening, general comments.
8. Our comments on the cap on housing numbers (Cre25/7) apply equally to this site. It is unclear how it might operate. Our view is homes on sites such as this one may not be deliverable in sufficient quantity by 2031 if the cap were applied, even if the infrastructure deemed necessary is provided on schedule which currently seems unlikely
9. There is nothing about a transport assessment being required for this site unlike Cre25 and Thr19 previously. This is inconsistent. Is the impact of this site being considered as part of the 3 Elms studies? If not its relatively small additional impact should be included in these studies or one that examines all of the approaches to the north western segment of the city (See our opening, general comments)
10. Unlike the site summaries for Cre25 and Thr19, the words here go on to say that once the bypass route is known The red route has now been chosen, its alignment is known and is causing considerable disquiet locally especially for those whose homes and/or businesses will be destroyed. This wording is unnecessarily inconsistent between sites

Thr 22 – Land east of Huntington Lane

1. Our point about conserving what remains of the avenue of lime trees along Kings Acre Road (Thr21/1) is equally relevant to this site. Access to this site could be via 3 Elms and from there either to the Kings Acre, Roman or 3 Elms Roads
2. Soils – our point under Thr21/4 is also relevant to this site
3. Open countryside – our point under Thr21/2 is also relevant to this site. However to say that there will be no loss of open space (should it be developed) is disingenuous. It is already open space and is currently used informally by local dog walkers etc.
4. The Parish Council agrees that the removal of the historic hedge along Huntington Lane would be harmful to the character of the lane and should be prevented by conditions applied to any permission for this site. This is important given various concerns about wider landscape impacts of potentially developing so many sites bordering Kings Acre Road
5. SPZ – our point under Thr21/7 is also relevant to this site but the wording used in the summary is much more detailed. Why? Both sites include areas within the red and green zones although this site has potentially more of the red (innermost) zone
6. See also Thr21/10 which is equally relevant to this site
7. Archaeology - See our comments under Thr21/6 which are also relevant to this site
8. Huntington conservation area – See our comments under Thr21/5 which are also relevant to this site

9. The Parish Council agrees that this site requires a transport assessment along with all the other potential sites along Kings Acre Road as part of a comprehensive approach to this radial road corridor. Our opening, general comments make this point.
10. There is no mention of a cap or pause in developing this site while infrastructure is provided that might resolve transport issues on the network locally. (see Thr21/8) – Why is this site not being treated in the same manner as others under consideration? This is inconsistent. This is a landlocked site as the access comments make clear and access would be required via another increasing their impact on the transport network.

Thr26a – Land at Huntington

1. The site summary mentions the 3 Elms SUE to the east and north and accepts that any development here will change the natural environment. In this connection what does 'revisit to assess the landscape implications' mean? Shouldn't the landscape implications be assessed before either site is considered as a possible housing site? We re-iterate our opening, general comment about a master plan being needed for this whole area to the west of Hereford city. Cre25/10 comment is also relevant here.
We note the landscape comments that 'this site has no capacity on its own for housing due to its openness and isolation from other residential development.....in its current status any development would be illogical' and feel that these together with the poor access to facilities and active travel facilities (shared with Cre25 amongst others and contained in the public transport comments within the technical summaries) make this site undeliverable in the next decade. These sites are simply not sustainable development.
2. There is no mention of this site being in the green (zone2) of the SPZ and there should be. This is a major constraint on the development potential of this site and the risks should be assessed now, along with those posed by the 3 Elms SUE already under consideration
3. Soils – like other sites under consideration this is identified as grade 2 agricultural land which is very good quality.
4. Archaeology – in view of the importance attached to this site in particular and the likelihood that these significant features have already been damaged, there should be one study covering this site and also Thr21 and Thr22.
5. The mention of the historic Brecon railway also applies to Thr19 but is not carried forward into its site summary. This is inconsistent. However we do not believe the comment to be particularly relevant in either case – unlike some other comments that are missed altogether in the summaries- as the line of the railway is only preserved in hedgerows and the occasional isolated bridge. Employment site ES1 would completely obliterate the remaining traces if it were to go ahead.
6. Our comments on the unlikely impacts on the Huntingdon conservation area are also relevant here. (Thr21/5, Thr22/8 etc.) As the site summary says the 3 Elms SUE is to the east and north of this site and thus shields the conservation area from any impacts. To the best of our knowledge none of the buildings in Huntington hamlet closest to this site are listed – they are modern farm buildings. Of much more concern to the parish council is the potential for inappropriate design such as three storey town houses in any of these locations especially along the Kings Acre Road frontage.

7. We do not understand the comments about the preferred red route for the proposed bypass reducing the housing potential of this site. This should be explained more clearly as the preferred red route alignment is completely within the 3 Elms SUE
8. There should not be a separate access to this site from Kings Acre Road. Our general opening comments and those at Thr19/7 and Thr21/1 about junctions along Kings Acre Road are also relevant to this site
9. Site Thr28 borders this site, it is dismissed as a potential housing site yet it is considered to have potential for a variety of junction/access points to this site or to provide land for the red route, proposed western bypass junction.
 - a. First, any such use would completely destroy the thriving businesses on Thr28 and reduce local facilities considerably.
 - b. Second our view is that if there is insufficient room for a junction large enough to serve a development of this size (520) on this site through Thr28 and that there is potential for an even bigger development in combination with Thr19 (an additional 260 units) then access should be to the north via ES1. The proposed western bypass will simply not work if housing sites feed into bypass junctions immediately. We will be repeating the mistakes made at other towns like Worcester.
 - c. Finally, this site meets the arbitrary size requirements to be considered a SUE (particularly if combined with Thr19) and should be master-planned in a similar way. In fact the whole NW quadrant of Hereford city must have its own master plan as we say in our opening, general comments.
10. We note what the site summary says about proposed caps on development and preference being given to the strategic sites. Our opening general comments and those at Cre25/7 are relevant here.
11. There is nothing about a transport assessment being required for this site unlike the some other sites under consideration locally. This is inconsistent. As previously noted there should be a holistic transport assessment of the impact that traffic from all these sites might have on the routes into Hereford from the west.
12. The Open Space requirements 'contribution will be asked for towards outdoor sports provision in Hereford City etc.' does not appear in the technical summaries of other potential housing sites along Kings Acre Road and this is, once again, inconsistent.
13. Our comments about the flood risk from overland flow at Thr19/10 also apply to this site

Thr 35 Wyevale Garden Centre

1. Permanent employment opportunities locally would be lost if this site were to be developed for housing like Cre25
2. While there may not be any landscape constraint on the development of this site, the meaning of the green buffer – which is to be retained - is unclear unless you read the technical summary. Our previous comments highlight the need to be consistent with comments on boundary screening (Cre25/5, Thr19/4, Thr22/4 etc.)
3. There is an implication that the existing access/exit of the garden centre is inadequate. Surely this currently generates as much traffic as a potential 80 home development??
4. Please see our Cre25/6 point about the need for a completely new junction on the A438. We would not want a separate junction onto the A480 followed closely by another at the

- A480/438. The transport assessment that is apparently required for this site – but not others – should be extended to the whole western approaches to Hereford
5. As with Cre25/10 the Parish Council disagrees most strongly with the use of the term ‘urban form’ here. It is wrong and misleading. It does not capture the nature of this area at all.
 6. We note what the site summary says about proposed caps on development and preference being given to the strategic sites. Our opening general comments and those at Cre25/7 are relevant here.
 7. Our comments that the meaning of the phrase ‘the scope and developments to be considered will need to be confirmed’ is unclear apply here. See also Cre25 and Thr19. Presumably this applies to every site but not every site summary includes it.
 8. We note that this is one of the few potential housing sites being considered in the area that apparently requires a contribution towards outdoor sports and, in this case, on site provision. Inconsistent. Such is the potential scale of housing development in the NW quadrant of Hereford to 2031 and beyond that there should be one strategy for the whole area to which all developments contribute
 9. Like so many site summaries this one says ‘until finalisation of this section of the route for the relief road is completed, its impact on this development is unknown’. The preferred red route is known, only the detailed alignment, engineering and final confirmation remains. This is inconsistent. As previously noted by the Parish Council the HTP – as long as it focusses almost entirely on the proposed bypass – will not provide any meaningful additional network capacity for developments such as these unless future residents wish to leave the city.
 10. Our comments under Cre25/11 about poor public transport and active travel connections/infrastructure currently making development here totally unsustainable are equally relevant to this site. A wonderful opportunity to develop a sizeable park and ride facility serving the whole NW segment of Hereford is being missed. One of these sites should be designated for this purpose. Once again we stress the need for a master plan for the NW segment.

3. Site specific comments – River Wye Special Area of Conservation (SAC)

Bel 08 Former Belmont Golf Course – we will focus primarily on the landscape and heritage objections to any development on this site but not that there are also serious constraints on access, sustainability and that the HTP may negatively impact on current connectivity

1. We are surprised that this site is even being considered for housing. It borders the SAC which forms the southern boundary of Breinton parish. It is an elevated site, overlooking the valley, an area of high, picturesque, landscape value and would be highly visible, not least from the Wye Valley Walk. Development here would adversely affect the setting of Warham House on the northern bank of the river in Breinton which shares a parkland setting – possibly designed by Repton - with Grade 2 listed Belmont House to the south. This is not mentioned in the summary. We would not support the extraction of sand and gravel from this site. We agree with the site summary that there are significant constraints to the more intensive use of this site; in fact we believe that the constraints are overwhelming and

insurmountable. How can the listed building designation box say 'n' when the same summary talks about listed Belmont House?

2. There should not be a 'minimal desire to introduce additional development here'; there should not be any desire at all to develop in this highly sensitive and historic setting. A potential capacity of 50 units is ludicrous
3. However if development were ever to be allowed in future it should not only be limited to the footprint of the modern building but also include restoring the Listed Belmont House.
4. The highway appraisal concludes that the site is suitable but no improvements should be necessary if there is a minimal desire to develop. If access was sufficient for any traffic generated by the former hotel and golf club then it should also be adequate for any development on the site unless standards have changed.

4. Site specific comments – Adams Hill

Thr23 – Land north of Lower Hill Farm. WE DO NOT BELIEVE THIS SITE IS SUITABLE FOR FURTHER INCLUSION IN THE HEREFORD AREA PLAN

1. We believe that the site map is badly drawn as it includes the allotments. Presumably this is a mistake?
2. As with previous site comments the Parish Council would support a thorough archaeological assessment of the site prior to any development should it be continued further as being suitable for housing in the future.
3. We agree totally that this site forms part of a sensitive landscape. The landscape and visual impacts of developing this area would be significant as it forms part of the raised rim of the bowl in which Hereford city sits and they should be assessed. There are especially fine views of the city and cathedral from Adams Hill. The fine 'long distance views in all directions' referred to in the site description of Thr24 – which is rightly dismissed as a potential housing site – are shared by Thr23
4. We fundamentally disagree with the comment that 'the only likely acceptable location for access is onto the A438 Kings Acre Road. There is no evidence given to support this conclusion nor is the source of this opinion made clear. Indeed there are other possible access points including the purpose built roundabout at the Wordsworth Rd/Westfaling Street junction. Our comments about the need to minimise the number of junctions along Kings Acre Road (See Cre25/65 for instance) are relevant here. Such an access road would reach Kings Acre Road directly opposite the putative access to sites Thr21 and Thr22.
 - a. The field through which any access road would pass is already the location of a new water storage pond. The flood alleviation scheme which drains into this pond seeks to prevent the recurrence of surface water flooding from the steep hillside to the south into the Fayre Oaks static caravan park and the Huntsman's Drive/Bridle Way housing estate. It has not proved adequate to prevent the field continuing to flood (2018 pictures can be provided).
 - b. Our comments under Thr21/1 regarding the avenue of lime trees along Kings Acre Road are also relevant here. Any road access/junction necessary to facilitate development of this site would destroy a good number of these trees on both sides of the road

- c. The northern part of this site by Kings Acre Road is right on the historic western boundary of Hereford city. At this point Kings Acre Road is unfortunately largely a finger of ribbon development extending westward out of the city. This ribbon acts as a physical and visual barrier to the rural area south of Kings Acre Road. The adopted Breinton NDP seeks to retain the last few remaining gaps in the Kings Acre Road frontage to retain brief glimpses of the countryside beyond it and access to it. This countryside is enjoyed by locals as well as residents from the Whitecross and Greyfriars wards of the city for informal recreation and has a good number of public rights of way. It is a wedge of open countryside extending deep into the city. It would be detrimental if the HAP allowed the infill of this last remaining gap in the Kings Acre Road frontage that is in Hereford and allowed ribbon development right up to the city boundary.
5. There are acknowledged road capacity issues in the area yet no transport assessment for this site is considered necessary apparently (like Thr26a/11). This is inconsistent compared to other sites locally. We note uniquely, that this site does not currently have Highways support according to the technical summary.
 6. What exactly is meant by the statement 'area extending close to Kings Acre Road south just past the caravan site is considered to have less (landscape) impact'? If it means more suitable for housing then this is exactly the area that remains prone to flooding (see point 4 above). As the Environment Agency overland flow flood risk maps show, this is an area of high risk. A road here, plus potentially housing along it could easily make matters worse. Breinton residents along the south side of Kings Acre Road would be particularly concerned at any worsening of the current situation in the fields behind their homes. Water ponds up in these every year. Development on land north of Lower Hill Farm could easily exacerbate existing problems
The open farm land south from the continuous boundaries of the caravan site and the Huntsman's Drive/Bridle Way estates rises straight away towards Lower Hill Farm itself and development here would become highly visible almost immediately. We do not agree that it would have less impact.
 7. There is no mention whatsoever of soil quality for this site in the site summary. This is inconsistent
 8. The site description mentions development south of the cemetery being suitable and then says that the cemetery needs to expand. These two statements potentially conflict – does the estimated site capacity (420) include the possible land take for the cemetery or not?
 9. We note that the site capacity (420) is close to the arbitrary 500 units used to define a SUE in the Core Strategy.
 10. We note what the site summary says about proposed caps on development and preference being given to the strategic sites. Our opening general comments and those at Cre25/6 are relevant here.
 11. This site is not acknowledged as being in the source protection zone (SPZ) – a major omission. In fact it covers part of the innermost (red, 1) zone and the outer (green, 2) zone. Our comments under Thr21/7 apply with equal force to this site. The SPZ is a major constraint on the development potential of this site and its 'only acceptable access point'. The risks should be assessed now like Thr26a/2 and certainly before the site is adopted by the HAP

4A Former Whitecross SUE

1. The site above - Thr23 - is essentially a re-presentation of the urban expansion area that was rejected in the Core Strategy (Revised Preferred Options background paper) dated October 2011. The reasons for rejection were
 - a. General - 'much of the land at Whitecross is elevated and forms a green corridor which is not as well suited to development as the other proposed sites for urban expansion. Breinton Ridge marked by a green lane and bridleway is the area that has high landscape value as a particularly visible landscape resource.....In access terms most traffic would use the Barton and Whitecross roads which are already heavily used with over capacity junctions entering the city at peak times'
 - b. Access - 'The Three Elms site could be accessed by the existing highway network (*including Kings Acre Road*) but some junction improvements would be required. There are concerns expressed within the SHLAA that the existing road network is not suitable to support the Whitecross site and a greater reliance on public transport would be required.
 - i. Using the existing available information regarding traffic modelling and local highway requirements, the Whitecross site would have the greatest implications on the network of all the strategic sites proposed'
 - c. Landscape character – 'Specific landscape character analysis has been undertaken on the strategic sites which highlights areas (as Homer West) and Whitecross as the least favourable in landscape terms'..... 'therefore if the protection of landscape were the most important factor in determining the choice of sites then the areas to the.....and west at Whitecross would be the least favourable'
 - d. Flood Risk - The surface water flooding information shows that access to the Whitecross site could be constrained by surface water flooding'. The sites that would be viewed as least favourable on flood risk include Whitecross.
 - e. Minerals – Parts of the Whitecross sites are covered by safeguarding minerals policy within the UDP
 - f. Consultation response – The western expansion area (Whitecross) would be the least favoured if the public response to the strategic sites was the only basis for choice. On the free write text the strongest concerns regarding why sites were unfavourable were the loss of farmland (consistently an important factor) followed by landscape character.
 - g. Overall conclusions – Whitecross and Three Elms do appear to be the least favourable sites when taking a variety of factors into consideration. Further assessment of the landscape character highlighted areas of Holmer West and Whitecross as being particularly vulnerable to change.
2. When the Core Strategy was examined in 2015 the Inspector agreed with these conclusions saying in para 20 of her report 'The location of the strategic sites has been carefully considered over a long period of time. Other sites put forward were less sustainable, were of greater landscape sensitivity, had greater infrastructure demands or were not preferred by locals'

3. This conclusion has not changed. None of these reasons for rejecting the Whitecross site have altered, nor has there been further work to show that they are misplaced. What has changed is that development of housing at both the Holmer West and 3 Elms SUEs' is now approved Core Strategy policy. Even at a reduced size it makes no sense to develop the Whitecross site in addition to these two SUEs' given the strong reasons for rejection in 2011, the Inspector's confirmation of these reasons in 2015 and the scale of development for the NW segment of Hereford that is already in the planning process.
4. The above October 2011 paper says that 'the remaining houses (outside the SUE's) would be dispersed within and around the city and mainly identified through the preparation of the Hereford Area Plan (HAP)'. This dispersal is patently not being followed by the HAP now given the proximity of Thr23 to Three Elms and the contribution all the other sites discussed here are clearly anticipated to make to the inflated housing totals for the city. The north west of the city is obviously expected to provide the sites for the majority of the new housing proposed by 2031.

4. Employment sites

ES1 – Livestock market

1. This is the only one of the five sites under consideration to be supported as a future employment site. It's additional to the 10ha of land for employment in the 3 Elms development. The consultation document justifies the need for still more land by saying at paragraph 2.22 that 'employment land at Rotherwas is quickly filling up as the take up rate for businesses wishing to locate here since the Enterprise Zone and Local Development order designation has been higher than historic building rates. It is likely that the land will be full to capacity in the next 5 years'. However the Parish Council sees no sign yet that this rapid take up rate is generating the number of jobs anticipated @6000 much less the traffic flows that a workforce of this size might be expected to generate if they did not live locally. It would appear that the need for the extra land that this site could provide is to
 - a. Try and cover the shortfall in job creation that is now becoming apparent and
 - b. as part of a deliberate plan to re-balance the city with more work and housing north of the river i.e. NW quadrant. Why is the Moreton on Lugg site not being considered in this context?
2. Paragraph 2.25 of the consultation document lists the criteria for choosing employment sites. Amongst these are 'proximity to A Roads suitable for heavy goods vehicles with access other networks'. Highways England's own data makes it very clear that this area has very few road dependent businesses nor are they likely to attract the low land use, high tech, well paid jobs that the city needs. This criterion should be deleted since employment sites that generate heavy vehicle traffic and which are car dependent are exactly the opposite of what is needed.

5 Summary answers to your questions

Question 1 Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response

1. The Parish Council has many concerns about the potential scale of housing growth over the next decade in the NW segment of the city in addition to the 3 Elms and Holmer SUEs'. This is not the strategy of dispersing new housing outside the SUEs' within and around the city i.e. dispersal that the public have repeatedly voted for during various consultations is in danger of being ignored.
2. If all – or even a majority of these sites were to be developed even in the medium to long term then there should be a master plan for the entire NW segment to deal comprehensively with the infrastructure needed and in particular the environmental consequences. The transport implications of some 4000 homes trying to access city services would be a priority topic – the proposed western bypass will not address these access is SUEs', it will simply help anyone who wishes to avoid the city.
3. We have concerns about all of the sites in this response – see our individual site by site comments but in particular
 - a. Thr23 and Bel08 should not proceed any further and should not appear in the final HAP
 - b. Thr19, Thr26a, Thr35 and Cre25 should not be developed in isolation from each other and should be subject to a separate master planning exercise if any were considered suitable.
 - c. Thr21 and Thr22 should not proceed independently of the 3 Elms SUE
4. The urban village (Cen21) should be developed so that it contains the maximum number of homes in this sustainable location. The 800 contained in the Core Strategy should be a minimum number like the other SUEs' (Our general comment 1.2 refers)

Question 2 Do you think that there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Not in the NW segment of Hereford city which is the area we have focussed on

Question 3 Do you think any particular sites should be developed in the short, medium or long term?

Given the potential impact of 'caps' and the priority being afforded to the SUEs' (Our comments under 1.8 and Cre25/7 refer) none of the sites we discussed in detail earlier should be developed in anything other than the long term and only then if it requires master plan and transport studies are done covering all the sites and surrounding areas. Thr23 and Bel08 should never be developed

Question 4 Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

No. See our detailed comments on ES1. If this site were to be developed it should be for high technology, valued added businesses and not those that rely on road transport to ship goods

Question 5 Do you think that there are other more suitable sites not shown on the plan that could be considered as future employment allocations

Yes – Moreton on Lugg. Although this is clearly outside the HAP area employment opportunities should not be solely assessed within the city boundary and the Moreton on Lugg site has direct access onto the A49 as well as potential rail links

Q6 Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Not amongst the sites we have considered

Q7 Do you think there are other more suitable sites not shown in the plan that could be considered for other uses as set out in questions 6 above?

No, not in the NW segment of the city

Q8 Do you have any comments on the document and the approach use to identify potential sites?

Please see our general points in paragraphs 1.1 to 1.9 inclusive

Yours sincerely

Tony Geeson
Chair Breinton Parish Council

Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address:
www.herefordshire.gov.uk/herefordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herefordareaplan as well as at libraries and information centres across the county.

Complete the questions for as many sites as you would like to comment on.

Please include the site reference for any you are making a specific comment on.

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

If no, please explain:

With regard to TU25, I fully endorse the concerns raised & feel the loss of amenity to the immediate community would be an unacceptable price to pay.

Access & egress would be problematic given the narrowness of Eign Mill Road.

The area has been used for many years as an informal play area for local children who otherwise would have to cross busy roads to access any similar facility.

Older children congregate on the area & can socialise freely without concerns of traffic, or upsetting local residents.

Dog walkers use the area regularly & it is generally appreciated as a local open space by residents.

It is believed the area has previously been used as a land-fill site & would need thorough evaluation before any residential development occurred.

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer:

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

If yes, please supply site details:

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain:

(Please use additional box at the back of questionnaire if you need more space to comment)

About you:

Name:.....**Ian Broom**.....

Address.....

Email:

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (FoI) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways:
Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to:
Forward Planning
Herefordshire Council Offices
Plough Lane
Hereford
HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Question 8 continued...



Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address:
www.herefordshire.gov.uk/herfordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herfordareaplan as well as at libraries and information centres across the county.

**Complete the questions for as many sites as you would like to comment on.
Please include the site reference for any you are making a specific comment on.**

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

If no, please explain: WITH REFERENCE SPECIFICALLY TO ~~TOP 26~~ TOP 26
WE CONSIDER THIS AREA UNSUITABLE FOR THE FOLLOWING REASONS:
THE ROAD NETWORK WILL NOT COPE WITH THE AMOUNT OF VEHICLES GENERATED
BY ANY ADDITIONAL HOUSES THE ROADS IN THIS AREA ARE DEFINITELY NOT
WIDE ENOUGH FOR THE AMOUNT OF VEHICLES THAT WILL INEVITABLY BE
PARKED ON THE ROADSIDE, DENYING RESIDENTS EASY ACCESS TO THEIR
OWN PROPERTY, CAUSING A SAFETY HAZARD AND THIS PROBLEM WILL BE MADE
EVEN WORSE ON DAYS WHEN SENIOR AND JUNIOR FOOTBALL MATCHES ARE TAKING
PLACE. THERE IS ALSO A PROBLEM WITH FLOODING ON THE BORDER OF
TOP 26.

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

NO COMMENT

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer: THE DEVELOPMENT OF TUP 26 SHOULD NOT BE CONSIDERED AT ALL FOR REASONS AS STATED IN QUESTION 1. BUT ALSO BECAUSE THIS AREA OF LAND WAS GIFTED TO THE COMMUNITY AS RECREATIONAL LAND NOT TO BE USED FOR ANY HOUSING DEVELOPMENT.

FOR REFERENCE SEE –

LAND REGISTRY DOCUMENT TITLE NO. HW89427

CONVEYANCE: 06/04/1984

TRANSFER: 13/07/1984

TRANSFER: 05/06/1985

TRANSFER: 03/04/1990

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

WITH REFERENCE TO JLP Q6 SEE COMMENTS MADE
IN QUESTIONS 1 2 3 :

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

NO COMMENT

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

If yes, please supply site details:

No COMMENT

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

No COMMENT

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain: I AM TOTALLY SHOCKED BY THE WAY IN WHICH ALL YOU HAVE ACHIEVED IS TO IDENTIFY AREAS OF GREEN LAND WITHOUT TAKING INTO CONSIDERATION THE IMPACT OF THESE PROPOSALS ON THE LIVES OF THE PEOPLE THAT ARE CURRENTLY LIVING IN THE AREA. YOU HAVE SHOWN COMPLETE DISREGARD IN THIS MATTER AND ESPECIALLY FOR THE LACK OF INFORMATION SUPPLIED TO THE AFFECTED RESIDENTS.

(Please use additional box at the back of questionnaire if you need more space to comment)

About you:

Name:..... MR & MRS K BURGE.....

Address [REDACTED].....

.....

Email:.... [REDACTED].....

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (Fol) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways:
Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to:
Forward Planning
Herefordshire Council Offices
Plough Lane
Hereford
HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Question 8 continued...