

Neighbourhood Planning Team

From: Turner, Andrew
Sent: 08 March 2019 14:57
To: Neighbourhood Planning Team
Subject: RE: Lyonshall Regulation 16 submission neighbourhood development plan consultation

RE: RE: Lyonshall Regulation 16 submission neighbourhood development plan consultation

Dear Neighbourhood Planning Team,

I refer to the above and would make the following comments with regard to the above proposed development plan.

It is my understanding that you do not require comment on Core Strategy proposals as part of this consultation or comment on sites which are awaiting or have already been granted planning approval.

Having reviewed records readily available, I would advise the following regarding the five (A-E) site allocations identified for new housing (Policy LH1) as outlined in red on: 'Map 4; Lyonshall Village Policy Map'

- Site A: Orchard behind Howe Terrace

A review of Ordnance survey historical plans indicate the site has historically been used as an orchard. By way of general advice I would mention that orchards can be subject to agricultural spraying practices which may, in some circumstances, lead to a legacy of contamination and any development should consider this

- Site E: Land opposite the Memorial Hall

A review of Ordnance survey historical plans indicate a railway track historically ran along the east side of the site boundary.

It is possible that unforeseen contamination may be present at the above mentioned site. Consideration should be given to the possibility of encountering contamination as a result of its former use and specialist advice be sought should any be encountered during the development.

General comments:

Developments such as hospitals, homes and schools may be considered 'sensitive' and as such consideration should be given to risk from contamination notwithstanding any comments. Please note that the above does not constitute a detailed investigation or desk study to consider risk from contamination. Should any information about the former uses of the proposed development areas be available I would recommend they be submitted for consideration as they may change the comments provided.

It should be recognised that contamination is a material planning consideration and is referred to within the NPPF. I would recommend applicants and those involved in the parish plan refer to the pertinent parts of the NPPF and be familiar with the requirements and meanings given when considering risk from contamination during development.

Finally it is also worth bearing in mind that the NPPF makes clear that the developer and/or landowner is responsible for securing safe development where a site is affected by contamination.

These comments are provided on the basis that any other developments would be subject to application through the normal planning process.

Kind regards

Andrew

Andrew Turner
Technical Officer (Air, Land and Water Protection)
Environmental Health & Trading Standards,
Economy and Place Directorate
Herefordshire Council,
8 St Owen Street,
PO Box 233
Hereford HR1 2PJ.
Direct Tel: 01432 260159
email: aturner@herefordshire.gov.uk

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 Save paper - please only print out this message if you really need to.

From: Neighbourhood Planning Team <neighbourhoodplanning@herefordshire.gov.uk>
Sent: 25 January 2019 10:57
Subject: Lyonshall Regulation 16 submission neighbourhood development plan consultation

Dear Consultee,

Lyonshall Parish Council have resubmitted their Regulation 16 Neighbourhood Development Plan (NDP) to Herefordshire Council for consultation.

The plan can be viewed at the following link:
https://www.herefordshire.gov.uk/directory_record/3084/lyonshall_neighbourhood_development_plan

Once adopted, this NDP will become a Statutory Development Plan Document the same as the Core Strategy.

The consultation runs from 25 January 2019 to 8 March 2019.

If you wish to make any comments on this Plan, please do so by e-mailing:
neighbourhoodplanning@herefordshire.gov.uk , or sending representations to the address below.

If you wish to be notified of the local planning authority's decision under Regulation 19 in relation to the Neighbourhood Development Plan, please indicate this on your representation.

Kind regards

Herefordshire.gov.uk

James Latham
Technical Support Officer
Neighbourhood Planning and Strategic Planning teams
Herefordshire Council
Plough Lane
Hereford
HR4 0LE

Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment

From Herefordshire Council Strategic Planning Team

Name of NDP: Lyonshall NDP Regulation 16

Date: 06/03/18

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
Draft Policy LH1 Settlement Boundaries	Policy RA3; RA2; SD3; SD1; SS2; MT1; H1;	(Y)	
Draft Policy LH2 House Types and Sizes	SD1; SS2; RA5	(Y)	
Draft Policy LH3 Promoting High Quality Design	E3; SD1; SS1; LD4;	(Y)	
Draft Policy LB1 Protecting and Enhancing Local Employment Opportunities in Lyonshall	Policies SS5; RA5; RA6; E1; E2; E3; E4; MTI; SS4	(Y)	
Draft Policy LB2 Supporting Rural Diversification	Policy RA5	(Y)	
Draft Policy LB3 Large Agricultural Buildings and Extensions	Policy RA6; MTI	(Y)	
Draft Policy LB4 Local Energy Schemes	SD2	(Y)	
Draft Policy LE1	Policies LD4;	(Y)	

Protecting and Enhancing Local Landscape Character and Built Heritage	SD1		
Draft Policy LE2 Protecting and Enhancing Local Wildlife	LD2	(Y/N)	<p>'All development in Lyonshall will be required to have no detrimental impact on the Curl Brook watercourse and, where possible, aid in it achieving 'good status' by 2027.'</p> <p>This provision is unnecessary as it duplicates the requirements of CS policy SD4; SD3 and ensure that development does not undermine the achievement of water quality.</p> <p>There is no need for the NDPs to include addition mitigation covered within these policies as it is within the higher level plan (the Core Strategy).</p>
Draft Policy LC1 Memorial Hall	SC1	(Y)	
Draft Policy LC2 Open Space	OS1, OS2; OS3	(Y)	
Draft Policy LT1 Transport & Accessibility	Policies SS4; MT1	(Y)	



The Coal
Authority



INVESTOR IN PEOPLE



RTPI
Learning Partner

200 Lichfield Lane
Berry Hill
Mansfield
Nottinghamshire
NG18 4RG

Tel: 01623 637 119 (Planning Enquiries)

Email: planningconsultation@coal.gov.uk

Web: www.gov.uk/coalauthority

For the Attention of: Neighbourhood Planning and Strategic Planning
Herefordshire Council

[By Email: neighbourhoodplanning@herefordshire.gov.uk]

15 February 2019

Dear Neighbourhood Planning and Strategic Planning teams

Lyonshall Neighbourhood Development Plan - Submission Draft

Thank you for consulting The Coal Authority on the above.

Having reviewed your document, I confirm that we have no specific comments to make on it.

Should you have any future enquiries please contact a member of Planning and Local Authority Liaison at The Coal Authority using the contact details above.

Yours sincerely

Christopher Telford BSc(Hons) DipTP MRTPI
Principal Development Manager

Neighbourhood Planning Team

From: David Oram
Sent: 08 March 2019 19:26
To: Neighbourhood Planning Team
Subject: Lyonshall NDP at Regulation 16 stage
Attachments: Comments on Regulation 16 NDP.docx

Please see attached document.

Regards,

David Oram

Comments on Regulation 16 version of Lyonshall Parish NDP

8th March 2019

Reference: NDP/105

There is a major and fundamental misconception held by Lyonshall Parish Council regarding housing needs within the parish.

Many people agree with 'Consultee 5.0' in Table 3 of the 'Residents Comments on the Consultation Responses 25th October – 7th December 2018', that 'We need to keep small villages small' otherwise 'we will destroy the countryside'. This is a self-evident truth. The 'Parish Council's Consideration' (also in Table 3) that this view is 'not accepted' serves to show the intransigent and unrepresentative attitude of the current parish council. New housing should be sparing, and well considered in both style and location. Two houses per annum, as considered to be suitable at one time in the near past, would seem to be appropriate today, and is likely to meet with parish residents' approval.

Many rural villages contain voids between houses where the fields reach the roads. To in-fill them amounts to creeping urbanisation which will eventually destroy the characters of our villages and hamlets. An example in Lyonshall is Fishpools where the medieval pools could have been restored, and the surrounding area made into a small park which is sadly missing in Lyonshall.

The land surrounding the village hall could also have been identified as a suitable site for a small recreational area (which was once one of the parish council's ambitions but no longer seems to be so). This would have preserved some of the remains of the medieval village which have already been located at this site, in particular as an opportunity for further excavations that future residents of the village may wish to be available to them. Where possible, we should not prejudice the needs of future citizens just because of our own present parochial inclinations.

There is little mention of future investigation of the remains of the medieval village, which must be considerable, particularly near to Lyonshall castle. If suitable, exposure of these could be a tourist attraction particularly if the castle and its environs were to be subject to some judicious restoration.

It is noted that nowhere in the NDP is the number of new properties ring fenced. This then seems to make the NDP a developers' charter and is not, therefore, as it stands, a document primarily for the benefit of the community.

Neighbourhood Planning Team

From: Norman Ryan <Ryan.Norman@dwrwymru.com>
Sent: 05 March 2019 10:16
To: Neighbourhood Planning Team
Cc: Evans Rhys
Subject: RE: Lyonshall Regulation 16 submission neighbourhood development plan consultation

Dear Sir/Madam,

I refer to the below consultation and would like to thank you for consulting Welsh Water.

As you will be aware, we were consulted and provided a response to the Regulation 14 consultation last year. We are pleased to note that the Parish Council has taken on board our comments and included our recommendations within the Neighbourhood Plan document – as such we have no further comment to make at the current time.

Should you require any further information, then please let me know.

Kind regards,



Ryan Norman
Forward Plans Officer | Developer Services | Dwr Cymru Welsh Water
Linea | Cardiff | CF3 0LT | T: 0800 917 2652 | www.dwrwymru.com

We will respond to your email as soon as possible but you should allow up to 10 working days to receive a response. For most of the services we offer we set out the timescales that we work to on our Developer Services section of our website. Just follow this link <http://www.dwrwymru.com/en/Developer-Services.aspx> and select the service you require where you will find more information and guidance notes which should assist you. If you cannot find the information you are looking for then please call us on 0800 917 2652 as we can normally deal with any questions you have during the call.

If we've gone the extra mile to provide you with excellent service, let us know. You can nominate an individual or team for a Diolch award through our [website](#).

From: Neighbourhood Planning Team [mailto:neighbourhoodplanning@herefordshire.gov.uk]
Sent: 25 January 2019 10:57
Subject: Lyonshall Regulation 16 submission neighbourhood development plan consultation

***** External Mail *****

Dear Consultee,

Lyonshall Parish Council have resubmitted their Regulation 16 Neighbourhood Development Plan (NDP) to Herefordshire Council for consultation.

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Once adopted, this NDP will become a Statutory Development Plan Document the same as the Core Strategy.

The consultation runs from 25 January 2019 to 8 March 2019.

If you wish to make any comments on this Plan, please do so by e-mailing:

neighbourhoodplanning@herefordshire.gov.uk, or sending representations to the address below.

Herefordshire Council
Neighbourhood Planning
Plough Lane
Hereford
HR4 0LE

Our ref: SV/2018/109876/OR-
29/PO1-L01

Your ref:

Date: 04 March 2019

F.A.O: Mr. James Latham

Dear Sir

LYONSHALL REGULATION 16 NEIGHBOURHOOD PLAN

I refer to your email of the 25 January 2019 in relation to the above Neighbourhood Plan (NP) consultation. We have reviewed the submitted document and would offer the following comments at this time.

As part of the adopted Herefordshire Council Core Strategy updates were made to both the Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS). This evidence base ensured that the proposed development in Hereford City, and other strategic sites (Market Towns), was viable and achievable. The updated evidence base did not extend to Rural Parishes at the NP level so it is important that these subsequent plans offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period.

We provided comments on the Regulation 14 consultation, noting that Site B was partially located within Flood Zone 2, the medium risk zone. Whilst the Regulation 16 NP has not provided detailed assessment of the adjacent ordinary watercourse, to ascertain a more accurate indication of flood risk, it has revised the site boundary so that the allocated area is wholly within Flood Zone 1, low risk.

As previously stated, the Flood Map at this location has not been produced from a detailed hydraulic model but by using a national, generalised mapping technique. Whilst this is the best data available at the current time, this is for indicative purposes only and may not be an accurate representation of the floodplain in this location as this type of mapping does not include the presence of structures such as bridges and culverts on flooding.

It should be noted that the river network that impacts Lyonshall, the Curl Brook in this instance, is classified as 'ordinary watercourse' and falls under the jurisdiction of Herefordshire Council and the Lead Local Flood Authority. Therefore, in consideration

Environment Agency
Hafren House, Welshpool Road, Shelton, Shropshire, Shrewsbury, SY3 8BB.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

of the above, we would not maintain our concerns on the NP but would recommend you seek the views of your Land Drainage team with regard to the suitability of the proposed development. Similarly Site C, whilst shown to fall wholly within Flood Zone 1, may have flood risk associated with it that is not shown on the Flood Map. Planning applications for the development of these two sites will require site specific Flood Risk Assessments (FRA's) to provide more a more detailed indication of flood risk. This may include focusing development on the Western Portion of the sites with a sufficient buffer zone between the housing and the watercourse which will enable compliance with point 8 of your Policy LH1 which promotes a sequential approach to flood risk.

Yours faithfully

Mr. Graeme Irwin

Senior Planning Advisor

Direct dial: 02030 251624

Direct e-mail: graeme.irwin@environment-agency.gov.uk



Historic England

WEST MIDLANDS OFFICE

Mr James Latham
Herefordshire Council
Neighbourhood Planning & Strategic Planning
Planning Services, PO Box 230, Blueschool House
Blueschool Street
Hereford
HR1 2ZB

Direct Dial: 0121 625 6861

Our ref: PL00539558

28 February 2019

Dear Mr Latham

LYONSHALL REGULATION 16 NEIGHBOURHOOD PLAN CONSULTATION

Thank you for the invitation to comment on the Submission Neighbourhood Plan. Our previous comments on the Regulation 14 Plan remain entirely relevant, that is: *“Historic England are supportive of the Vision and objectives set out in the Plan and the content of the document, particularly its’ emphasis on local distinctiveness including undesignated heritage assets, the maintenance of historic rural character and the importance of good design”.*

Overall the plan reads as a well-considered document which we consider takes a suitably proportionate approach to the historic environment of the Parish.

Beyond those observations we have no further substantive comments to make on what Historic England considers is a good example of community led planning.

I hope you find this advice helpful.

Yours sincerely,

Susan Smith
Business Officer
susan.smith@HistoricEngland.org.uk

cc:



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6870
HistoricEngland.org.uk



Neighbourhood Planning Team

From: John Quinton-Adams
Sent: 11 March 2019 10:05
To: Neighbourhood Planning Team
Subject: Lyonshall NDP - Stage 16 Consultation.

Importance: High

Lyonshall Draft Neighbourhood Development Plan [NDP] Stage 16 Formal Consultation.

John Quinton-Adams

Overall Comment – belated Objection.

This is to advise you that it is with the deepest concern that I and my Partner have been unable to respond to this document by the deadline of March 8th. Unfortunately I only discovered it by chance on the Lyonshall Website [www.lyonshall.net] on March the 9th (Friday) and to-day is the first working day after that. I found it when I accessed the sub-section "NDP Home Page – Current Consultations" on another matter. No announcement had been made by the usual Email alert system, in the "News and Events" section of the website or in the February/March issue of The Parish Magazine Lyonshall CPC insert where the only references to the NDP are to its modification at the 'Regulation 14' stage and that it would "... now progress to the Regulation 15 stage of the legal process"

This is regrettably typical of NDP Consultations in The Parish of Lyonshall which have relied on the Lyonshall Website as the main, and often the sole source of information distribution. The number of Lyonshall residents who access the Website on a daily basis or who have the facilities to print off lengthy (47 pages in colour) documents is almost certainly extremely small, hence the very small number of respondents to previous consultations also – less than 10% on average. Lyonshall is not exceptionally apathetic, but we can't comment on what we don't know about.

Please accept our apologies and add this Email to your file as coming from two Registered Electors of Lyonshall.

Yours faithfully

John Quinton-Adams
(details as above)

Julia Caroline Evans MA

Late Representation

Neighbourhood Planning Team

From: Louise Edwards
Sent: 10 March 2019 20:32
To: Neighbourhood Planning Team
Subject: Re: Lyonshall Neighbourhood Development Plan

Dear Sirs

Further to my email below, I have been investigating further the background of Paul Avery, both the Chair of the Lyonshall Parish Council and Chair of the Steering Group for the NDP. Mr Avery is the main Director of Lyonshall Property Company Limited, an active company which operates in the 'real estate' sector (Companies House classification). To my knowledge, these interests have not been declared anywhere. In a steering group of only 3, Mr Avery and the Kirkwells representative account for 2 of the group. I therefore have serious concerns about conflicts of interest and poor governance practices in the drafting of the NDP for Lyonshall. As stated below, this is not a community-created plan.

Yours faithfully
Louise Edwards

From: Louise Edwards
Sent: 07 March 2019 20:41
To: neighbourhoodplanning@herefordshire.gov.uk
Subject: Lyonshall Neighbourhood Development Plan

Dear Sirs

On behalf of the Edwards family, who have been in possession of ADDRESS REDACTED, for several generations, I would like to express my concerns about the Neighbourhood Development Plan submitted by the Parish Council, supported by Kirkwells, consultants to property developers.

This Plan is, unfortunately, developer-driven for profit and not community-created.

Response rates on community consultation have been low, demonstrating that the level of engagement with the community has not acquired the dynamism that it should have done. The involvement of Kirkwells in the consultation process is particularly concerning; I urge you to look closely at the methods and tactics employed. The attitudes of some of those who did respond was only changed by the apparent offer of community facilities in return for additional housing (as acknowledged by the steering group itself). In reality, these facilities are showing very little progress. The conversion of the Royal George Inn, which was supposed to represent the heart of the village (in return for the building of 30 houses by the developer) was given planning permission in 2017, but is currently lying derelict.

We are now being asked to support additional housing, for which there appears to be little demand, as evidenced by the extremely slow rate of sales of houses recently constructed. The proposed settlement boundary will extend greatly the area allocated for housing over the coming decade, with the attendant (potentially negative) impact on the village and its environment.

Yours faithfully

Neighbourhood Planning Team
Planning Services
PO Box 4
Hereford
HR1 2ZB

Lucy Bartley
Consultant Town Planner

Tel: 01926 439116
n.grid@woodplc.com

Sent by email to:
neighbourhoodplanning@herefordshire.gov.uk

06 February 2019

Dear Sir / Madam

**Lyonshall Neighbourhood Plan Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

About National Grid

National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.

Specific Comments

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High-Pressure apparatus.

National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.

Key resources / contacts

National Grid has provided information in relation to electricity and transmission assets via the following internet link:

<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>



Electricity distribution

The electricity distribution operator in Herefordshire Council is Western Power Distribution. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Lucy Bartley
Consultant Town Planner

n.grid@woodplc.com

Wood E&I Solutions UK Ltd
Gables House
Kenilworth Road
Leamington Spa
Warwickshire
CV32 6JX

Spencer Jefferies
Development Liaison Officer, National Grid

box.landandacquisitions@nationalgrid.com

National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

Yours faithfully

[via email]

Lucy Bartley
Consultant Town Planner

cc. Spencer Jefferies, National Grid

Date: 18 February 2019
Our ref: 272687
Your ref: Lyonshall Neighbourhood Plan



James Latham
Neighbourhood Planning and Strategic Planning teams
Herefordshire Council
Plough Lane
Hereford
HR4 0LE

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

neighbourhoodplanning@herefordshire.gov.uk

T 0300 060 3900

Dear Mr Latham

Lyonshall Neighbourhood Development Plan - Regulation 16 submission

Thank you for your consultation on the above dated 25 January 2019.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made..

Natural England does not have any specific comments on this neighbourhood plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely

Victoria Kirkham
Consultations Team

Neighbourhood Planning Team

From: Tim Edwards
Sent: 08 March 2019 12:47
To: Neighbourhood Planning Team
Subject: Lyonshall NDP - Stage 16 Consultation

Lyonshall Draft Neighbourhood Development Plan (NDP) Stage 16 Consultation

Tim Edwards on behalf of Ray Edwards (owner)
ADDRESS REDACTED

Overall Comments – objection

Whilst a lot of work has gone into this document and process, it makes sad reading. A comparison with the similar plan for Eardisland (2016) is revealing. Whilst Eardisland NDP has the environment, the community and heritage at its heart, the Lyonshall plan seems to be all about new housing and an overriding desire for the village to expand, rather than about re-establishing the reason for Lyonshall and how the community might rebuild.

One is left with the view that the wishes of local landowners to sell land for housing has been a priority, rather than developing the heart of the village where a mix of people could live together as a thriving community. The number of new houses is already well ahead of those needed or required. There is no demonstration that the majority of Lyonshall owners support the big (and legally unnecessary) expansion of the village and what benefits this might bring. Indeed, one of the few arguments – that it will justify the reopening of The Royal George – is highly questionable (see below).

Already it can be seen that the take-up of housing on new developments already approved isn't happening and they don't take into account integration with neighbouring long-established properties. The Burnt Orchard/ White Lion Meadow development, in particular, has been going on for a long time as a building site with the houses still not completed and not all those that have are sold. If there was demand, surely this would have been long-since completed, sold and occupied? Thought should have been given in the plan to how new developments need to integrate with neighbouring, long-established properties. In this case, it resulted in a huge, tall solid wooden fence being erected in very close proximity to ADDRESS REDACTED and which has adversely and unnecessarily affected the setting and enjoyment of it.

There is very little in the consultation devoted to the population imbalance in Lyonshall and how this might be redressed to make for a sustainable community. It is estimated that

already, about 30% of the entire population is aged over 65. Building more luxury houses in isolation, without the necessary back-up infrastructure – nearby shops, nursery, pre-school and primary/ secondary schools (including 6th form), social facilities etc – will not encourage more younger people to move to and live in Lyonshall. Indeed, as with many villages, the drain of the young (those needing work and raising a family) and the very old (those needing specialist care) is likely to leave Lyonshall even more of a car-dependant, isolated community largely attractive only for the healthy retired 60 to 80 year olds. It is these issues that should form the basis of long-term Neighbourhood Development Plans.

Specific Objections

Page Number	4
Paragraph Number	Background
Policy Number	

Object	√
Making a Comment	√

“Our conclusion was that people had accepted the argument that a pub and a shop, both of which had closed owing to lack of use, would not be sustainable in the future without more growth in the village”.

This statement is considered by many in Lyonshall/ Holme Marsh to be hugely misleading. There is no mention about the nature of the voting and what percentage of the electorate was involved in the process – understood to be extremely low, due to poor publicity.

Page Number	17
Paragraph Number	3.1.3
Policy Number	3.1 Housing

Object	√
Making a Comment	√

“From April 2011 to April 2018 (the latest figures available from Herefordshire Council), 25 new houses were built in the parish. As at January 2019, existing commitments (where planning permission has been granted but development has not been implemented) number a further 47 houses and 6 under construction. This gives a total figure of 77 new houses already built or committed in Lyonshall parish, exceeding the minimum indicative housing growth target for Lyonshall by 41 units. However, NDPs can plan for more housing than the minimum requirement”

The plan does NOT demonstrate why there is any need to build far more houses than the growth target. There appears to be no shortage of homes in the village at the moment and no excessive demand over supply. Indeed, it is arguable that the reverse is the case (there

is more supply than demand). Building more homes where there is not the demand, is not the answer.

Page Number	17
Paragraph Number	3.1.5
Policy Number	3.1 Housing

Object	√
Making a Comment	√

“The response to the Issues and Options consultation demonstrated overwhelming local support for some further new housing development in the Parish, provided it is sensitive to local character. 77.4% of respondents supported more new housing and, of these, 39.8% favoured more than 30 units, with 37.6% preferring fewer than 30 units. 71% of respondents also supported further development which could include developer contributions towards improving community assets such as the Memorial Hall”

There is no indication as to how many respondents these figures are based upon. e.g: 77.4% of what number? We were completely unaware of any survey and therefore unable to respond. Did a majority of the population respond? Appendix 4 suggests a response rate of 25% to the Housing Survey. If this is the level, surely it is too low to be regarded as representative

Page Number	18
Paragraph Number	3.1.7
Policy Number	3.1 Housing

Object	√
Making a Comment	√

“However, leading up to and during the consultation on Issues and Options, the Parish Council was approached by local landowners proposing potential areas of land as suitable for new housing development around Lyonshall village. There was therefore a need to consider whether any or all of those areas should be included within the new settlement boundary as possible housing site allocations”

Why was there a need to extend the settlement boundary, just because local landowners proposed areas of land suitable for development, when the target number of new homes had already been met? The Burnt Orchard/ “White Lion Meadow” development is a classic case. These have (and are) struggling to sell and this has delayed the building process . Where is the need for still more houses and where is the demand?

Page Number	18
Paragraph Number	3.1.8 Map

Policy Number	3.1 Housing
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Object	√
Making a Comment	√

Even if there is demand (which is questionable), why does the village development boundary need to be extended in a linear way south along the A480? This takes away the village feel, by making a disproportionately long, overly linear village.

Linear development has blighted many villages and why so many have increasingly suffered from having no “heart”. Not so much in Lyonshall, but where linear development has occurred along a main trunk road, you now have numerous examples where a village is effectively bisected, with two halves not able to integrate due to the constant heavy lorries and traffic thundering through a village divided into two and people (especially the young and the elderly) fearful of crossing into “the other half”.

It defeats the argument about needing more houses to justify The Royal George, if people can’t quickly walk to it. If they have to drive because the village has become linear, then people can’t (by definition) then drink alcohol.

Page Number	19 and 25
Paragraph Number	3.1.9 and 3.1.21
Policy Number	3.1 Housing

Object	√
Making a Comment	√

Again, the number of respondents is not indicated. Appendix 4 suggests a response rate of 25% which is surely too low to be regarded as representative.

What has been the response rate to the surveys and questionnaires that the draft plan is based upon?