

Stretton Sugwas Neighbourhood Development Plan 2019 - 2031

Consultation Statement

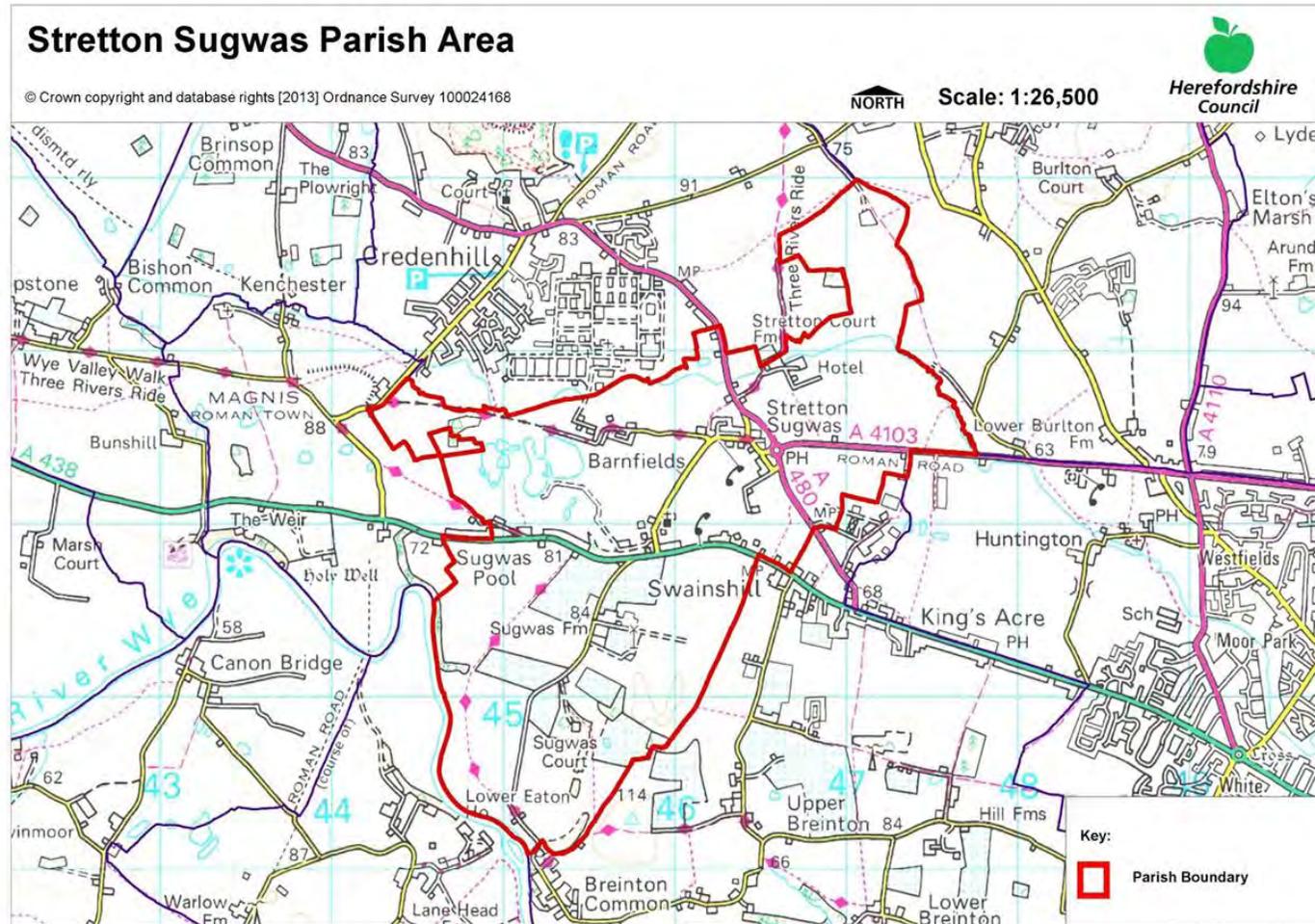


Stretton Sugwas Parish Council with assistance from



March 2019

Map 1 Stretton Sugwas Designated Neighbourhood Plan Area



Stretton Sugwas Parish Council OS Licensee Licence Number: 010054472

1.0 Introduction and Background

- 1.1 This Consultation Statement has been prepared in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Paragraph 15 (2)¹ which defines a “consultation statement” as *a document which –*
- (a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;*
 - (b) explains how they were consulted;*
 - (c) summarises the main issues and concerns raised by the persons consulted; and*
 - (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.*
- 1.2 Stretton Sugwas Neighbourhood Development Plan has been prepared in response to the Localism Act 2011, which gives parish councils and other relevant bodies, new powers to prepare statutory Neighbourhood Plans to help guide development in their local areas. These powers give local people the opportunity to shape new development, as planning applications are determined in accordance with national planning policy and the local development plan, and neighbourhood plans form part of this Framework. Other new powers include Community Right to Build Orders whereby local communities have the ability to grant planning permission for new buildings.
- 1.3 In September 2013 the Parish Council applied to Herefordshire Council for Designation as a Neighbourhood Area and the Designation was approved on 25 November 2013. The Designated Area follows the Parish Boundary and is shown on Map 1 above. The Parish Council initially made the decision to work closely with the neighbouring parish of Breinton on joint issues as the two Parishes share boundaries and have similar characteristics and challenges. A Steering Group of local residents and members of the Parish Council was established in late 2013 to oversee the preparation of the

¹ <http://www.legislation.gov.uk/uksi/2012/637/contents/made>

Plan. As work on the Plan moved forwards, the steering group met separately from the Breinton group, but close liaison and consultation between members continued throughout the process.

2.0 Draft Neighbourhood Plan Development Informal Consultation on Emerging Plan, Spring 2015

- 2.1 The Parish Council considered a First Draft Neighbourhood Plan in November 2014 and undertook some initial, informal consultation with Parishioners, landowners and local businesses during December 2014 to March 2015. Comments received on the Plan during this time were used to inform the revised Draft Plan. Publicity information is provided in **Appendix I**. About 12 people attended the drop ins. There were no significant issues raised.
- 2.2 There have been ongoing informal discussions with the Duchy of Cornwall (the principal landowner in the area) but no other landowner has raised issues apart from Morgan-Jones during the June 2018 informal consultation on settlement boundaries.
- 2.3 The results of this informal stage of public consultation were used to inform the content of the Draft Neighbourhood Development Plan.

3.0 First Regulation 14 Formal Consultation on the Stretton Sugwas Draft Neighbourhood Development Plan – Monday 14th September to Monday 26th October 2015

3.1 The public consultation on the Stretton Sugwas Draft Neighbourhood Plan was carried out in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Pre-submission consultation and publicity, paragraph 14. This states that:

Before submitting a plan proposal to the local planning authority, a qualifying body must—

(a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area

(i) details of the proposals for a neighbourhood development plan;

(ii) details of where and when the proposals for a neighbourhood development plan may be inspected;

(iii) details of how to make representations; and

(iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;

(b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and

(c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.

3.2 The Stretton Sugwas Draft Neighbourhood Plan was published for formal consultation for 6 weeks from Monday 14th September to Monday 26th October 2015. The Environmental Report for Strategic Environmental Assessment (SEA) of the Neighbourhood Plan also was published for consultation with Historic England, Natural England and the Environment Agency by Herefordshire Council when the Draft Plan was published.

3.3 The Draft Neighbourhood Plan and a copy of the Response Form were available for viewing and downloading from the neighbourhood plan website <http://www.strettonsugwasparishcouncil.co.uk/#!neighbourhood-planning/c103d> with a link from Herefordshire Council's website

<https://www.herefordshire.gov.uk/planning-and-building-control/neighbourhood-planning/submitted-draft-plans-and-adopted-neighbourhood-development-plans> . Screenshots of these web pages are provided in **Appendix II**. Consultation responses were invited using the accompanying Response Form (provided in **Appendix II**) to the Parish Clerk via an email to shirley@melconltd.co.uk or by post to: Shirley Williams, Kemeys, Swainshill, Hereford HR4 7PU.

- 3.4 An e-mail or letter was sent to all Consultation Bodies, providing information about the consultation dates, and the locations where the Draft Plan and accompanying documents could be viewed and downloaded. Copies of the letters were sent or emailed out to local businesses and local community organisations. Respondents were invited to complete the Response Form and to submit completed forms / other comments by email or by post to the Parish Clerk. A copy of the letter and the complete list of Consultation Bodies and other groups / organisations consulted is provided in **Appendix II**. The list of Consultation Bodies was kindly provided by Herefordshire Council.
- 3.5 The Steering Group (in discussion with their planning consultants) felt that a drop in event would not be the most effective way to consult with local residents in Stretton Sugwas as an event had already been organised fairly recently at the informal consultation stage, providing an opportunity to comment on and discuss the content of the emerging Plan with Steering Group members. Instead other methods of raising awareness and encouraging engagement were used including the following:
- Display of the flyer on Parish Council Notice boards and delivery to local households - see **Appendix II**
 - Notice in Stretton Sugwas Parish Council Newsletter – October 2015 – See **Appendix II**
- 3.6 A copy of the Draft Neighbourhood Plan was submitted to Herefordshire Council.

4.0 Summary of Consultation Responses to the Draft Neighbourhood Plan

- 4.1 Detailed responses were received from Herefordshire Council Neighbourhood Planning and Planning Policy Teams advising some changes to policies in the Plan. During the consultation period the Herefordshire Local Plan Core Strategy 2011-2031 was adopted by Herefordshire Council (on 16 October 2015) and therefore greater certainty was provided in terms of local strategic policy and supporting text wording, and many of the comments from the Council reflected recent changes and general conformity issues. In particular there were concerns about Draft Policy SS2 and that the Parish Council decided not to allocate sites for housing or identify a settlement boundary in the Plan. It was recommended that the Parish Council reconsiders this approach to the delivery of housing by either allocating land, identifying a settlement boundary and/or demonstrating capacity. In response the Submission Plan sets out more detailed information about existing commitments and in particular windfall sites coming forward since 2011, demonstrating that the housing target figure of at least 24 additional units should be exceeded or at least met, assuming the rate of development continues over the next 16 years. There were also concerns about the prescriptive nature of design Policy SS4 and this Policy has been amended slightly to increase flexibility - it is also worth noting that Historic England commended the approach in the Policy. The other Policy comments were largely taken on board in terms of minor amendments to wording.
- 4.2 Other detailed comments were submitted by Environment Agency included the proposed inclusion of an additional policy relating to directing development away from areas of greatest risk of flooding. This has been taken on board and included in the Submission Plan. The Coal Authority had no comments.
- 4.3 There were no responses submitted from local groups or residents.
- 4.4 Table 1 below sets out the responses submitted to the Draft Neighbourhood Plan, together with information about how these responses have been considered by the Parish Council and have informed the amendments to the revised Neighbourhood Plan.

Table 1 Summary of Consultation Responses and Consideration of Responses, Stretton Sugwas Draft Neighbourhood Development Plan.

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
Herefordshire Council Ref. No. 1	All			Comment	<p>Stretton Sugwas Neighbourhood Plan Regulation 14 – Draft (Autumn 2015)</p> <p>Herefordshire Council Service Providers responses – (26th October 2015).</p> <p>Please find attached additional comments from a number of Herefordshire Council service providers to the Draft Stretton Sugwas Neighbourhood Plan. If you have any queries regarding the comments or issues raised below, please contact the Neighbourhood Planning team in the first instance</p>	Noted.	No change.
Neighbourhood Planning Ref. No. 2	11	1.11		Comment	<p>Thank you for the opportunity to comment on your Plan. Overall the Plan is well laid out and provides detailed explanations. I have a few comments to make on individual policies and details within the Plan, which are detailed below:</p> <p>The Core Strategy has now been adopted and therefore all references to the UDP should be removed from the Neighbourhood Plan.</p> <p>Page 11, paragraph 1.11 it details local commitments for housing, one application for one house at Veldifer (141899/O) and also a</p>	<p>Accepted.</p> <p>Delete the 2 commitments which are in Breinton Parish.</p>	<p>Amend Plan.</p> <p>Amend 1.11:</p> <p>Delete the 2 commitments which are in Breinton Parish.</p>

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					current application, yet to be determined, for two dwellings at Veldifer (151786/O), both of these applications are located within the Breinton Parish and not Stretton Sugwas. Therefore they cannot be considered as commitments within the Plan.		
Ref. No. 3	14	2.6		Comment	Page 14, Para 2.6 the wording ‘figure 4.20’ needs updating following the adoption of the Core Strategy to ‘figure 4.14)	Accepted. Update references to Adopted Local Plan Core Strategy.	Amend Plan. Amend Para 2.6 to refer to Figure 4.14.
Ref. No. 4		2.8		Comment	Para 2.8 – needs updating following the adoption of the Core Strategy Table at the bottom of page 14 could be updated with the housing commitment figures.	Accepted. Update references to Adopted Local Plan Core Strategy.	Amend Plan. Amend para 2.8 to: <u>“The Adopted Herefordshire Local Plan Core Strategy 2011-2031 sets in paragraph 4.8.21 that “(neighbourhood) plans will be the principal mechanism by which new rural housing will be allocated. The proportional growth target within policy RA1 will provide the basis for the minimum level of new housing that will be accommodated in each</u>

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							<p><u>neighbourhood development plan. The target represents a level of growth for parishes, as a percentage, that is proportionate to existing HMA characteristics. The main focus for development will be within or adjacent to existing settlements indicated within fig 4.14 and 4.15. In parishes which have more than one settlement listed in Figure 4.14 and 4.15 the relevant neighbourhood development plan will have appropriate flexibility to apportion the minimum housing requirement between the settlements concerned. This will allow for a locally flexible approach that will respect settlement characteristics, the distribution of local facilities and other local factors."</u></p>

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Ref. No 5		2.9		Comment	Para 2.9 – the commitment figure will need to be revised due to the houses at Veldifer located within Breinton parish	Accepted. Amend and update paras 1.11 and 2.9.	Amend Plan. Amend para 2.9 to: <u>“Taking into account the indicative housing target growth figure of 18% for Hereford rural Housing Market Area (HMA) in the Adopted Local Plan Core Strategy, the indicative housing target figure for Stretton Sugwas neighbourhood area is at least 31 new houses from 2011 to 2031.</u> <u>Table 2 below shows that a total of 7 dwellings have been built since 2011 or have planning consent, leaving a net housing target figure of at least 24 units.”</u> Insert Herefordshire Council table as provided below. Table 2

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Ref. No 6			SS2	Comment	Policy SS2, without the allocation of neither sites, nor settlement boundaries the clarity of where the settlements end and open countryside begins is unclear, from a Development Management point of view this needs more clarity.	Accepted. Amend Policy SS2 to provide greater clarity.	Amend Plan: Amend para 6.1.10: The Parish Council supports the emerging Adopted <u>Herefordshire</u> Local Plan Core Strategy's proposed growth figure for the Hereford local housing market area and considers that an overall growth figure of around 18% would be appropriate for the Parish up to 2031. However the Parish Council is concerned that focussing all this growth on the																								

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							<p>settlements of Stretton Sugwas and Swainshill may impact adversely on the form and layout of these small, rural settlements which are characterised by fragmented smallholdings, hamlets and farmsteads. Therefore the Parish Council would prefer to see a pattern of development which compliments and supports this existing settlement pattern.</p> <p>Therefore some, limited development (as under Policy RA3 in the Adopted Local Plan Core Strategy) may also be appropriate in some, limited circumstances. and includes some, limited development around the smaller settlements and hamlets, rather than providing all the new housing in one or two larger scale development proposals.</p> <p>Amend Policy SS2 to read:</p>

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
							<p>PROPOSALS FOR NEW DEVELOPMENT WILL BE SUPPORTED ON SITES WITHIN THE IDENTIFIED SETTLEMENT BOUNDARIES OF STRETTON SUGWAS AND SWAINSHILL. AND SMALLER SETTLEMENTS THROUGHOUT THE PARISH. AS DEFINED ON MAPS x AND Y BELOW.</p> <p><u>DEVELOPMENT IN STRETTON SUGWAS AND SWAINSHILL MUST BE LIMITED TO SMALL TO MEDIUM SCALE SCHEMES OF UP TO 10 UNITS IN ANY ONE PROPOSAL IN ORDER TO MAINTAIN THE LOCAL CHARACTER OF SMALL AND FRAGMENTED GROUPS OF HOUSES AND SMALLHOLDINGS.</u></p> <p><u>PROPOSALS WILL BE REQUIRED TO DEMONSTRATE PHYSICAL AND VISUAL LINKAGES TO THE EXISTING BUILT UP AREA.</u></p> <p><u>THE RE-DEVELOPMENT AND RE-USE OF EXISTING</u></p>

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							<p><u>BROWNFIELD SITES AND BUILDINGS HAS A PRIORITY OVER GREENFIELD SITES. DEVELOPMENT PROPOSALS FOR GREENFIELD SITES WILL BE REQUIRED TO DEMONSTRATE THAT SUITABLE BROWNFIELD ALTERNATIVES HAVE BEEN EXPLORED AND THAT THEY ARE NOT DELIVERABLE WITHIN A THREE YEAR PERIOD.</u></p> <p><u>OUTSIDE OF THESE AREAS, THE NEIGHBOURHOOD AREA IS DEFINED AS OPEN COUNTRYSIDE. HOUSING DEVELOPMENT IN THE WIDER RURAL AREA (AS UNDER POLICY RA3 IN THE ADOPTED HEREFORDSHIRE LOCAL PLAN CORE STRATEGY) WILL BE REQUIRED TO ADJOIN EXISTING BUILT FORM OR OCCUPY INFILL SITES WITHIN THE SCATTERED SETTLEMENTS OF ROMAN WAY, PRIORY AND STRETTON COURT, BARNFIELDS,</u></p>

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							<p><u>RAILWAY TERRACE, MORNINGSIDE, SUGWAS AND ROMAN ROAD. PREFERENCE WILL BE GIVEN TO THE SENSITIVE CONVERSION OF EXISTING REDUNDANT BUILDINGS AND RE-USE OF BROWNFIELD SITES IN LINE WITH DESIGN POLICIES SS3 AND SS4 BELOW.</u></p> <p><u>WHERE A CASE IS MADE FOR A GENUINE LOCAL NEED AND AFFORDABLE HOUSING, A SUITABLE PROPORTION OF MARKET HOUSING WILL BE SUPPORTED IN ORDER TO MAKE THE SCHEME DELIVERABLE (AS IN POLICY H2 OF THE ADOPTED HEREFORDSHIRE LOCAL PLAN CORE STRATEGY). ALL SCHEMES SHOULD BE CAREFULLY INTEGRATED INTO THE EXISTING FARMSTEADS AND HOLDINGS AND BE OF A HIGH QUALITY DESIGN.</u></p>

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							<p><u>DEVELOPMENT ON LAND IN THE OPEN COUNTRYSIDE WILL BE RESISTED TO ENSURE THAT INDIVIDUAL SETTLEMENTS REMAIN DISTINCT FROM ONE ANOTHER AND DO NOT MERGE TOGETHER.”</u></p> <p>INSERT MAPS SHOWING SETTLEMENT BOUNDARIES.</p>
Ref. No 7			SS4	Comment	Policy SS4 – this policy is too restrictive (particularly points 5, 6, 7 and 9) and are conflicting with some Permitted Development rights, these points should be reviewed and maybe change the wording to either ‘desirable’ or ‘should be encouraged’.	Accepted. Amend Plan as suggested.	<p>Amend Plan.</p> <p>Amend Policy SS4:</p> <p>Point 5 – amend to</p> <p>“5. WINDOW DESIGN IS CRITICAL TO THE OVERALL APPEARANCE OF A BUILDING. STAINED TIMBER, UPVC, ALUMINIUM OR PLASTIC COATED TIMBER FRAMES ARE NOT ENCOURAGED. UNSTAINED TIMBER WINDOW FRAMES AND DOORS <u>SHOULD BE USED</u></p>

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							<p>WHEREVER POSSIBLE. SHOULD BE ENTIRELY OF TIMBER AND NOT STAINED WHEREVER POSSIBLE..</p> <p>Pont 6 – amend to:</p> <p>“6. PARTICULAR ATTENTION <u>IS ENCOURAGED TO BE SHOULD BE PAID TO</u> THE FOLLOWING ASPECTS OF BUILDING DESIGN:</p> <ul style="list-style-type: none"> • THE SILHOUETTE PRODUCED BY ROOF FORMS AND CHIMNEYS • BALANCE OF VERTICAL AND HORIZONTAL EMPHASIS IN BUILDING COMPOSITION • ROOF SPAN AND PITCH • DISTRIBUTION AND PROPORTION OF WINDOWS WITHIN THE OVERALL “GRID” OF THE ELEVATION

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							<ul style="list-style-type: none"> • RELATIONSHIP OF THE UPPER FLOOR WINDOWS TO THE EAVES • PROGRESSIVE CHANGES IN MATERIAL AS HORIZONTAL STRATA • THE TEXTURE OF MATERIALS AND REPETITION / TESSELATION OF SMALL ELEMENTS OF CONSTRUCTION (BRICKS, TILES, SLATES, WINDOW PANES) • CHARACTERISTIC WEATHERINGS SUCH AS HOODS AND PENTICE BOARDS • THE USE OF GARDEN WALLS, HEDGES AND OTHER APPROPRIATE BOUNDARY TREATMENT TO ESTABLISH THE BUILDING WITHN THE SITE AND CONNECT WITH OTHER BUILDINGS. TIMBER PALISADE FENCING SHOULD ONLY BE USED TO SEPARATE ADJACENT DOMESTIC REAR GARDENS AND NOT USED TO

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							<p>SCREEN FRONT ELEVATIONS FROM THE ROAD.</p> <p>Point 7 – amend to:</p> <p>“7. <u>WHEVER POSSIBLE</u> PRIVATE PAVEMENTS ADJOINING THE PUBLIC PAVEMENT SHOULD BE HARD LANDSCAPED WITH COBBLES, STONE OR SOFT LANDSCAPED WITH GRAVEL OR PLANTING IN SOIL POCKETS, OR A COMBINATION OF THESE. PRIVATE PATHWAYS, VISIBLE FROM THE STREET SHOULD BE OF GRAVEL OR STONE CONSTRUCTION..”</p> <p>Point 9 – amend to</p> <p>“9. <u>WHERE POSSIBLE</u> VEHICLES AND PARKING SHOULD NOT DOMINATE DEVELOPMENTS. ON-PLOT VEHICLE HARDSTANDINGS TO THE FRONT OF PROPERTIES SHOULD BE AVOIDED <u>ARE NOT ENCOURAGED</u> AND STRATEGIES SUCH AS THE USE OF REAR-COURT PARKING</p>

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Ref. No 8		6.2		Comment	Para 6.2 – delete references to the UDP	Accepted. Delete all references to the UDP in the Plan.	Amend Plan. Find and delete all references to the UDP including para 6.2.																														
Ref. No 9		6.2.3		Comment	<p>Para 6.2.3 – See previous comment regarding Commitments According to our database the following are your commitments within your parish since 2011 and can be used towards the housing figure numbers:</p> <table border="1"> <thead> <tr> <th>Application Status</th> <th>Application Number</th> <th>Site Address</th> <th>Parish</th> <th>Total</th> <th>Notes</th> </tr> </thead> <tbody> <tr> <td>Active</td> <td>131798</td> <td>Land at Church Cottage, Swainshill, Herefordshire.</td> <td>Stretton Sugwas</td> <td>1</td> <td>Proposed replacement dwelling</td> </tr> <tr> <td></td> <td>140664</td> <td>Meadowcroft, Swainshill, Hereford, Herefordshire, HR4 7PU</td> <td>Stretton Sugwas</td> <td>1</td> <td>Proposed variation of condition 2 of planning permission S123076/F;(Demolition of existing house and replace with new dwelling) Revised plan to enable a single storey extension to be built on west side of the dwelling to provide family room, rear entrance and cloakroom.</td> </tr> <tr> <td></td> <td>141240</td> <td>Land at the Travellers Rest, Stretton Sugwas, Herefordshire, HR4 7AL</td> <td>Stretton Sugwas</td> <td>5</td> <td>Proposed erection of 5 terraced houses and formation of parking</td> </tr> <tr> <td colspan="6">Total 7 dwellings</td> </tr> </tbody> </table>	Application Status	Application Number	Site Address	Parish	Total	Notes	Active	131798	Land at Church Cottage, Swainshill, Herefordshire.	Stretton Sugwas	1	Proposed replacement dwelling		140664	Meadowcroft, Swainshill, Hereford, Herefordshire, HR4 7PU	Stretton Sugwas	1	Proposed variation of condition 2 of planning permission S123076/F;(Demolition of existing house and replace with new dwelling) Revised plan to enable a single storey extension to be built on west side of the dwelling to provide family room, rear entrance and cloakroom.		141240	Land at the Travellers Rest, Stretton Sugwas, Herefordshire, HR4 7AL	Stretton Sugwas	5	Proposed erection of 5 terraced houses and formation of parking	Total 7 dwellings						Accepted. See above. Amend and update paragraph 6.2.3.	Amend Plan. Amend paragraph 6.2.3 to: “6.2.3 Within the <u>Adopted Local Plan Core Strategy 2011 - 2031</u> , Stretton Sugwas and Swainshill villages are identified in <u>Figure 4.14</u> as two of “ <u>the settlements which are main focal points of proportionate housing development</u> ”. Across Herefordshire’s rural areas these main focal points will have to provide for approximately 5,300 new dwellings over the plan period of 2011-2031. Within the Hereford Rural Housing Market Area, 1870 new dwellings will have to be
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					Total 7 dwellings		<p>provided over this period. Stretton Sugwas and Swainshill will have to contribute to achieving this figure of 1870 new dwellings. The emerging Herefordshire <u>Local Plan</u> Core Strategy sets a growth target for Hereford rural area of 18% and this equates to a net figure of at least 25-24 new houses over the Plan period at Stretton Sugwas and Swainshill. Neighbourhood plans have to allocate land for new housing or demonstrate delivery to provide the levels of housing required in the HMA target.”</p> <p>Amend Para 6.2.4: Update reference to Policy RA2 to wording of Adopted Plan.</p>

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Ref. No 10			SS6 3a AND 4	Comment	<p>Policy SS6 Point 3a – this can be very subjective and therefore needs more clarity, i.e noise etc.</p> <p>Policy SS6 Point 4 – the wording is confusing due to two sizes of schemes</p>	<p>Accepted.</p> <p>Amend SS6 Point 3a and Point 4 to improve clarity.</p>	<p>Amend Plan.</p> <p>Amend SS6 Point 3a to:</p> <p>“A. ADVERSELY AFFECT THE NEIGHBOURS’ ENJOYMENT OF THEIR HOMES AND GARDENS <u>THROUGH FOR INSTANCE DISTURBANCE FROM EXCESS NOISE, ODOURS, LOSS OF LIGHT,OR TRAFFIC MOVEMENTS</u>”</p> <p>Amend ss6 Point 4 to:</p> <p>“4. DEVELOPMENT SHOULD BE OF A SMALL SCALE AND SHOULD NOT EXCEED 10 HOUSES IN ANY SINGLE SCHEME.</p> <p>New point 5:</p> <p>“ WITH A LAYOUT AND DESIGN WHICH PROVIDES HOUSING IN <u>OF MEDIUM TO LARGER SCHEMES (5 TO 10 HOUSES)</u> SHOULD BREAK GROUPS OF HOUSES UP INTO SMALLER GROUPS OR CLUSTERS OF UP TO 5</p>

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							PROPERTIES WHEREVER POSSIBLE.
Development Management Ref. No 11					No comments received	Noted.	No change.
Planning Policy Ref. No 12	All - general			Comment	<p>I note that the Parish Council has decided not to allocate sites for housing or identify a settlement boundary in the Plan and has given reasons for adopting this approach. However I strongly recommend that the Parish Council reconsiders this approach to the delivery of housing by either allocating land, identifying a settlement boundary and/or demonstrating capacity. I believe this approach would provide a more robust framework for the delivery of future housing in the parish. Furthermore it would assist in the achievement of the Parish’s key aim of protecting it from adverse impacts arising from development pressures associated with its location on the urban fringe of Hereford City by providing greater certainty over the delivery of its housing requirement.</p> <p>I note that the draft plan includes reference to the proposed relief road and seeks to address negative impacts of this. The Parish Council may like to include an additional policy specifically on this issue which may</p>	<p>Noted and not accepted.</p> <p>The Parish Council does not consider that it is necessary for the Plan to identify a settlement boundary or site allocations. The criteria based policy approach supports a continuation of the patterns of development which have been characteristic of the neighbourhood area for many years; that is, small windfall sites of one or a couple of new houses, and conversions coming forward on a regular basis.</p> <p>There is no reason to suppose that the target housing figure of at least 24 new dwellings would not be reached by 2031; indeed there is evidence to show that existing commitments number 7 units since 2011 (a period of only 4 years). Projecting forward at a similar rate of approximately 1.75 units per annum, this would provide another 28</p>	<p>Amend Plan.</p> <p>Amend Para 6.2.5 to:</p> <p>“6.2.5 Assuming a target growth of around 18%, there is a need to provide around 25 24 new units of market housing in Stretton Sugwas and Swainshill. <u>Settlement boundaries are provided in the Plan but not site allocations. The criteria based policy approach supports a continuation of the patterns of development which have been characteristic of the neighbourhood area for many years; that is, small windfall sites of one or a couple of new houses, and conversions coming forward on a regular basis, together with some</u></p>

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					<p>include reference to a number of factors for example, lighting, types of materials to reduce noise, screening through landscaping etc.</p> <p>In terms of housing the Parish Council may like to include reference to the need for affordable housing in the Plan.</p>	<p>units which is well in excess of the target figure.</p> <p>The Plan should be amended to include the above information in support of its overall approach and strategy.</p> <p>The Parish Council accepts that the Plan should include a policy to guide new road schemes.</p> <p>The Parish Council does not accept that there is a need for the Plan to address affordable housing as this is dealt with adequately through the Policies in the Adopted Local Plan Core Strategy. However Policy SS6 has been amended to include a further criterion addressing local need – see Ref No 16 below.</p>	<p><u>larger schemes where appropriate. There is no reason to suppose that the target housing figure of at least 24 new dwellings would not be reached by 2031; indeed there is evidence to show that existing commitments number 7 units since 2011 (a period of only 4 years). Projecting forward at a similar rate of approximately 1.75 units per annum, this would provide another 28 units which is well in excess of the target figure.</u></p> <p>Any new development should relate well to the existing settlements and growth should be managed to ensure that the strong sense of a rural village community is maintained.</p> <p>Include additional text as para 6.3.8:</p> <p><u>“The proposed Western Relief Road will impact adversely on the quality of life of residents and wildlife in the Parish. On the advice of Herefordshire</u></p>

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							<p><u>Council at Regulation 14 consultation stage, an additional policy has been included in the Plan to address the likely negative impacts of the proposed new road and any other roads on the neighbourhood area.”</u></p> <p>Include NEW POLICY SS8:</p> <p><u>SS8 NEW ROADS</u></p> <p><u>PROPOSALS FOR ANY NEW ROADS AND IN PARTICULAR THE PROPOSED WESTERN RELIEF ROAD, WILL BE REQUIRED TO INCORPORATE THE FOLLOWING TO REDUCE ADVERSE IMPACTS ON LOCAL LANDSCAPE CHARACTER, WILDLIFE AND LOCAL QUALITY OF LIFE:</u></p> <p><u>1. NEW ROADS SHOULD BE ROUTED CAREFULLY TO INTEGRATE SYMPATHETICALLY WITH THE NATURAL LANDSCAPE, AND DESIGNED AND SITED TO AVOID ENCOURAGEMENT OF “RAT RUNNING”.</u></p>

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							<p><u>2. ANY ARTIFICIAL LIGHTING SHOULD BE MINIMISED; WHERE PROVISION OF HIGHWAY LIGHTING IS CONSIDERED ESSENTIAL, LIGHTING SHOULD BE DESIGNED THROUGH USE OF APPROPRIATE LUMINOSITY AND DIRECTION OF LIGHTFLOW TO HAVE A LOW IMPACT ON THE SURROUNDING LANDSCAPE AND HOUSING, AND SHOULD NOT LEAK UNNECESSARY LIGHT INTO THE NIGHT SKY.</u></p> <p><u>3. ANY NEW ROADS SHOULD BE PART OF A HIGH QUALITY LANDSCAPING SCHEME INVOLVING SHORT TERM AND LONG TERM PLANTING USING INDIGENOUS AND LOCALLY APPROPRIATE TREE AND SHRUB SPECIES TO PROVIDE SCREENING AND SOUND AND VISUAL BARRIERS.</u></p> <p><u>4. SUITABLE ROAD SURFACE MATERIALS SHOULD BE USED TO REDUCE NOISE IMPACTS. USE OF CONCRETE SHOULD BE AVOIDED. USE OF ARTIFICIAL EARTH BUNDING IS ENCOURAGED TO REDUCE</u></p>

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							<p><u>NOISE AND IMPROVE VISUAL AMENITY.</u></p> <p><u>5. ACCESS FOR WILDLIFE SHOULD BE PROVIDED WHERE WILDLIFE CORRIDORS ARE TRUNCATED OR SEVERED SUCH AS USE OF UNDER PASSES, BRIDGES ETC</u></p> <p><u>6. ROADS SHOULD INCLUDE PROVISION OF APPROPRIATE WATER MANAGEMENT AND STORAGE TO MINIMISE RUN OFF INTO NEIGHBOURING FIELDS AND PROPERTIES.</u></p> <p><u>7. ROADS SHOULD HAVE CONTINUED ACCESS FOR PUBLIC FOOTPATHS, CYLCLEWAYS AND BRIDLEWAYS VIA FOOT BRIDGES WHICH ARE OF A HIGH QUALITY DESIGN AND SITED APPROPRIATELY.</u></p> <p><u>8. CONTINUED ACCESS FOR LANDOWNERS AND FARMERS IS A PRIORITY PARTICULARLY WHERE LAND HOLDINGS ARE AFFECTED BY SEVERANCE.</u></p> <p><u>9. EXISTING LOCAL LANES SHOULD NOT BE SEVERED BY THE LINK ROAD IF AT ALL POSSIBLE.</u></p>

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							<p><u>PROPOSALS FOR INTRODUCING QUIET LANES, TRAFFIC CALMING AND MAXIMUM SPEED LIMITS OF 20MPH WILL BE SUPPORTED IN PRINCIPLE ON HEAVILY USED ROUTES THROUGH THE PARISH TO DISCOURAGE HEAVY TRAFFIC, IF AND WHEN THE PROPOSED WESTERN RELIEF ROAD IS COMPLETED. PARTICULAR CONSIDERATION SHOULD BE GIVEN TO REDUCING OPPORTUNITIES FOR “RAT RUNNING”.</u></p>
Ref. No 13			SS2	Comment	<p>SS2 I note that SS2 states that “proposals for new development will be supported on sites adjoining the existing settlements of Stretton Sugwas and Swainshill and smaller settlements throughout the parish”. I am concerned that this approach does not accord with Policy RA2 and the settlements identified in Tables 4.14 and 4.15. I therefore recommend that the Parish Council reconsider this approach particularly in the context of the earlier point relating to the allocation of sites and identification of a settlement boundary.</p>	<p>Accepted. SS2 has been amended – see Ref. No. 6 above.</p>	<p>No further change.</p>

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Ref. No 14			SS3	Comment	<p>SS3</p> <p>I have discussed some of the wording of this policy with the County Ecologist and we suggest that consideration is given to rewording criteria 2 and 4:</p> <p>We suggest that Criteria 2 should refer to the conserving and enhancing of biodiversity, particularly on designated sites rather than preserving of wildlife and habitats.</p> <p>It would be helpful if criterion 4 differentiated between local and traditional orchards, the latter being designated as BAP areas. We suggest that the reference to the demonstration of viability is removed in relation to traditional orchards and replaced with the requirement to consider the importance of the biodiversity value of orchards.</p>	<p>Partially accepted.</p> <p>See Ref No 26 below – Natural England comments re SS3 – these largely cover the same points.</p>	<p>Amend Plan.</p> <p>Amend Criterion 4: “4. DEVELOPERS ARE REQUIRED TO CONSIDER AND TAKE ACCOUNT OF THE IMPORTANCE OF THE BIODIVERSITY VALUE OF TRADITIONAL ORCHARDS. DEVELOPMENT WHICH INVOLVES THE REMOVAL OF EXISTING TRADITIONAL LOCAL ORCHARDS WILL BE RESISTED UNLESS DEVELOPERS CAN DEMONSTRATE THAT THE ORCHARDS ARE NO LONGER VIABLE. WHERE ORCHARDS ARE LOST AS A RESULT OF NEW DEVELOPMENT PROPOSALS, DEVELOPERS WILL BE EXPECTED TO INCLUDE FRUIT SPECIES TRADITIONAL TO THE LOCAL AREA IN LANDSCAPING SCHEMES.</p>
Ref. No 15			SS4	Comment	<p>SS4</p> <p>This policy includes some very detailed points which I am concerned may be over-restrictive and may conflict with permitted development rights. I recommend that this policy is reviewed to ensure that this is not the case.</p>	<p>Partially accepted.</p> <p>The Policy has been amended se Ref. No. 7 above to provide greater flexibility see above.</p>	<p>No further changes.</p>

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						See also comments from Historic England below commending the approach taken to design and distinctiveness.	
Ref. No 16			SS6	Comment	<p>SS6 I recommend that an additional criterion is included in Policy SS6 referring to the requirement for a mix of housing type to reflect Core Strategy Policies H1 and RA2.</p> <p>Criterion 3A would benefit from rewording to provide clarity about the ways in which the enjoyment of their homes and gardens may be adversely affected. I am concerned that as worded this policy may be difficult to apply.</p>	<p>Partially accepted.</p> <p>Insert additional criterion 7 as suggested.</p>	<p>Amend Plan.</p> <p>Amend Policy SS6.</p> <p>Insert additional criterion (8): <u>“SCHEMES SHOULD INCLUDE A MIX OF HOUSING TYPES AND SIZES TO MEET LOCAL NEEDS.”</u></p> <p>Criterion 3a has been amended – see Ref. No. 10 above – so no further change.</p>
Ref. No 17			SS7	Comment	<p>SS7 It may be useful if Policy SS7 is expanded to protect against the loss of any existing or future community facilities. This would be in line with Policy SC1 of the Core Strategy.</p>	<p>Accepted.</p> <p>Insert additional wording to Policy SS7 as suggested,</p>	<p>Amend Plan.</p> <p>Insert additional sentence at the end of the Policy: <u>“THE LOSS OF ANY EXISTING OR FUTURE COMMUNITY FACILITIES WILL BE RESISTED.”</u></p>
Landscape / Archaeology/ conservation					No comments received	Noted.	No change.
Strategic Housing					No comments received	Noted.	No change.

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Economic Development					No comments Received	Noted.	No change.
Environmental Health Ref. No 18	All			Comment	<p>Given that no specific sites have been identified in the plan I am unable to provide comment with regard to potential contamination.</p> <p>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.</p> <p>Finally 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.</p>	<p>Noted.</p> <p>Environmental Health will be consulted on planning applications as and when they come forward as part of the development management process.</p>	No change.
Parks and Countryside					No comments received	Noted.	No change.

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Transportation and Highways					No comments received	Noted.	No change.
Waste					No comments received	Noted.	No change.
Education					No comments received	Noted.	No change.
Historic England Pete Boland Historic Places Adviser E-mail: peter.boland@HistoricEngland.org.uk Ref. No 19	All		SS3 and SS4	Support	<p>Dear Sirs</p> <p>STRETTON SUGWAS NEIGHBOURHOOD PLAN – REGULATION 14 CONSULTATION</p> <p>Thank you for the invitation to comment on the draft Neighbourhood Plan. Historic England are supportive of the content of the document, particularly its’ emphasis on local distinctiveness and the maintenance of rural character and we consider it takes a suitably proportionate approach to the historic environment of the Parish.</p> <p>We particularly commend the thorough approach taken to, inter alia, landscape design (Policy SS3) and the retention of locally important buildings and orchards and the protection of archaeological remains. Equally commendable is the approach taken to Building Design (Policy SS4) and historic farmsteads and the emphasis placed on the importance of avoiding “generic schemes” in the design of new housing. Overall the plan reads as a well-considered, concise and fit for purpose document.</p>	Noted.	No change.

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			SS3		<p>There is one minor point we wish to raise in relation to paragraph 1 of Policy SS3. That is, at present the policy refers to “buildings dating from the previous century”. Taken literally that would restrict the policy to structures from the 1900’s which we presume is not the intention. We would suggest the policy is reworded to read “buildings dating from previous centuries”.</p> <p>Beyond those observations we have no further substantive comments to make on what Historic England considers is a good example of community led planning.</p> <p>I hope you find this advice helpful.</p> <p>Yours faithfully</p>	<p>Accepted.</p> <p>Amend SS3 as suggested.</p>	<p>Amend Plan.</p> <p>Amend SS3: “1. DEVELOPMENT PROPOSALS SHOULD SEEK TO PRESERVE OR ENHANCE THE CHARACTER OF THE VILLAGES AND RURAL SETTLEMENTS, ESPECIALLY THOSE WITH BUILDINGS DATING FROM THE PREVIOUS CENTURY BUILDINGS DATING FROM PREVIOUS CENTURIES. THE DEMOLITION OF BUILDINGS AND STRUCTURES THAT CONTRIBUTE TO THE CHARACTER AND APPEARANCE OF THESE AREAS WILL BE RESISTED.</p>
Environment Agency Ref. No 20	All			Comment	<p>To assist the Environment Agency in providing the most focused and accurate consultation responses through the Neighbourhood Planning process we have produced the attached pro-forma for you to complete and return to the Neighbourhood Planning team at Herefordshire Council.</p> <p>Together with Natural England, English Heritage and the Forestry Commission we have published joint advice on Neighbourhood Planning which sets out sources of environmental information and</p>	<p>Noted.</p> <p>The Neighbourhood Plan does not include site allocations and the matters raised should be addressed through the development management process as and when planning applications come forward.</p> <p>A new Policy SS3 for flood management has been included – see below.</p>	<p>No further changes.</p>

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					<p>ideas on incorporating the environment into plans. This is available at: http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf</p> <p>The below detail takes you through the issues we would consider in reviewing your Plan. We aim to reduce flood risk, whilst protecting and enhancing the water environment, land and Biodiversity. We recommend completing this to check whether we are likely to have any concerns with your Neighbourhood Plan at later stages.</p> <p>Flood Risk Your Neighbourhood Plan should conform to national and local policies on flood risk. National Planning Policy Framework (NPPF) – Paragraph 100 states that ‘Inappropriate development in areas of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere’.</p> <p>In reference to the emerging Herefordshire Council Strategy it is important that your Plan is in accordance with Policy SD3 – Sustainable Water Management and the associated text. https://beta.herefordshire.gov.uk/media/7848349/pre-submission_publication.pdf</p>		

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					<p>If your Neighbourhood Plan is proposing sites for development you should check whether any of the proposed allocations are at risk of fluvial flooding based on our Flood Map. For example are there any areas of Flood Zone 3 or 2 (High and Medium Risk). In line with National Planning Policy and, specifically, the Sequential Test, we would expect all built development to be located within Flood Zone 1, the low risk Zone.</p> <p>Our Flood Map can be accessed via the following link: http://watermaps.environment-agency.gov.uk/wiyby/wiyby.aspx?topic=floodmap#x=357683&y=355134&scale=2</p> <p>In addition to the above you should also check with the Council's Neighbourhood Planning team with regards to other sources of flooding as detailed in their Strategic Flood Risk Assessment (SFRA). Herefordshire Council, as the Lead Local Flood Authority (LLFA), now has responsibility for local flood risk management and may hold flooding information that is not identified on our Flood Map.</p> <p>Specifically, some watercourses have not been modelled on our Flood Maps (Our Flood Maps primarily show flooding from Main Rivers, not ordinary watercourses, or un-</p>		

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					<p>modelled rivers, with a catchment of less than 3km²). Herefordshire Council intend to undertake additional assessment of ordinary watercourses, or relevant unmodelled rivers, to ensure that the impact from these sources is understood and can be factored into your Neighbourhood Plan submissions.</p> <p>Where an unmodelled watercourse is present, or adjacent to a site, then it may be prudent to incorporate a buffer zone in consideration of flood risk not shown on the Flood Map. Where flooding could be extensive modelling may be necessary to confirm that the site is developable, that there will be no impact on third parties and assess any opportunities for enhancement.</p> <p>As stated above, some assessment is necessary in your Plan, to inform the deliverability of sites. Additionally all sites with flood risk issues, especially those with ordinary watercourses or unmodeled rivers within/adjacent or near to sites, are likely to need detailed modelling at the planning application stage to verify the design flood extents, developable areas and that the development will be safe.</p> <p>Flood Defences - Areas of your Parish, or proposed sites, may be afforded protection by a flood defence/alleviation scheme. Where this is the case your Plan should acknowledge this and identify the level of protection</p>		

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					<p>provided. It should be noted that flood defences are intended to protect existing properties and are not to facilitate new development in areas that would otherwise be impacted by flooding. Any assessment of development behind flood defences should consider the impacts of a breach or overtopping. Where it is determined that new development should be behind a flood defence financial contributions may be sought to maintain or improve the structure.</p> <p>Waste Water Infrastructure The Environment Agency has offered advice to Herefordshire Council, as part of their Core Strategy, to help ensure that their strategic housing growth can be accommodated in consideration of waste water infrastructure. Information on the County's treatment works and their ability to accommodate housing growth can be found in the attached spreadsheet.</p> <p>Given that local growth areas have been deferred to the local level waste water infrastructure is also of importance in your Neighbourhood Plan. Where housing is proposed you should use the pro-forma to identify the receiving treatment works and whether the housing and/or any employment growth can be accommodated without impacted the received treatment works. You</p>		

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					<p>should look at physical capacity issues (e.g. network pipes) and environmental capacity (quality of treated effluent) issues.</p> <p>Where there is an identified constraint (amber or red) you will need to demonstrate that there is a solution (it may be already programmed, or could be a possible future infrastructure upgrade) to help improve the capacity issue and enable the development to go ahead. This will require consultation with the Utility Company and we have developed a set of general questions to assist this process. The outcome of this may inform a ‘phasing’ policy within your plan where appropriate. It may also be necessary to produce an ‘Infrastructure Delivery Plan’ to set out any key milestones for waste water infrastructure upgrades and improvements. The evidence you produce should give a reasonable degree of certainty to all parties, helping demonstrate development is deliverable, and importantly ensure that your plan is ‘sound’.</p> <p>Note: Government Guidance states that sufficient detail should be provided to give clarity to all parties on when infrastructure upgrades will be provided, looking at the needs and costs (what and how much). The NPPG refers to “ensuring viability and deliverability – pursuing sustainable development requires careful attention to</p>		

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					<p>viability and costs in plan making and decision making”. Plans should be “deliverable”. Nutrient Management Plan (NMP): The River Wye and River Lugg are areas of special importance for nature conservation, with both rivers being designated as Sites of Specific Scientific Interest (SSSIs). The lower stretches of the River Lugg, along with the River Wye, are also a part of the River Wye Special Area of Conservation (SAC). Parts of the River Wye and Lugg are currently not meeting the required phosphate reduction targets for water quality and this could be further impacted by future growth within the catchment.</p> <p>In consideration of the above we have produced a Nutrient Management Plan (NMP) to identify areas of the Catchment where the receiving treatment works are vulnerable to housing growth. Potential impacts appear to relate to long term growth and Welsh Water are currently undertaking Asset Management Plan (AMP) trials to investigate methods of ensuring their treatment works can accommodate housing growth in the long term. Where development is likely to pose water quality impact upon the SAC we would expect to see confirmation that there are appropriate measures in place to help accommodate sustainable growth.</p>		

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					<p>Water Management and Groundwater Protection:</p> <p>In February 2011, the Government signalled its belief that more locally focussed decision making and action should sit at the heart of improvements to the water environment. This is widely known as the catchment-based approach and has been adopted to deliver requirements under the Water Framework Directive. It seeks to:</p> <ul style="list-style-type: none"> • deliver positive and sustained outcomes for the water environment by promoting a better understanding of the environment at a local level; and • to encourage local collaboration and more transparent decision-making when both planning and delivering activities to improve the water environment. <p>Neighbourhood Plans provide an opportunity to deliver multi-functional benefits through linking development with enhancements to the environment.</p> <p>Herefordshire County, and the Wye Catchment, falls within the Severn River Basin Management Plan area and the document highlights key issues and actions for the Wye that should be of use in developing your Neighbourhood Plan.</p> <p>https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/291442/gemi0910bssk-e-e.pdf</p>		

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					<p>http://www.catchmentbasedapproach.org/severn/wye http://www.wyeuskfoundation.org/projects/whip2.php</p> <p>Source Protection Zone: Some areas of your Parish, and specific potential site allocations, may be located within Source Protection Zone (SPZ) 1, which indicates a sensitive hydrogeological setting. You should consider this constraint within your plan and when allocating sites. Specifically your plan should consider the relevance of the designation and the potential implication on development, with reference to our Groundwater Protection: principles and Practice (GP3) policy: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297347/LIT_7660_9a3742.pdf</p> <p>Development and surface water drainage will need to be carefully located and designed to avoid pollution risks to controlled waters and address potential environmental impact associated with low flows. For example SuDS on the sites may need to provide multiple levels of treatment. To address the quantitative issues with the waterbodies, SuDS should be designed so to maximise recharge to the aquifer and support water levels in the receiving brooks.</p>		

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					For further information or advice please contact us on shwgplanning@environment-agency.gov.uk		
Environment Agency Ref. No 21	All				<p>Dear Sir STRETTON SUGWAS DRAFT NEIGHBOURHOOD PLAN I refer to your email of the 15 September in relation to the above Neighbourhood Plan (NP) consultation. We have reviewed the submitted document and would offer the following comments at this time.</p> <p>In relation to matters within our remit, Herefordshire Council have updated their Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS) documents. This evidence base sits alongside the recently adopted Core Strategy (October 2015) and seeks to ensure that the proposed development in Hereford City, and other strategic sites (Market Towns), is viable and achievable. The updated evidence base does 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.</p>	<p>Noted – see above.</p> <p>Insert additional policy to manage flood risk.</p>	<p>Amend Plan.</p> <p>Insert additional text 6.1.11: <u>“There are two areas of significant flood risk in the area; along the River Wye and around the Yazor Brook. In conformity with both the National Planning Policy Guidance (NPPG) and Herefordshire Councils Adopted Core Strategy (Policy SD3) new development should adhere to a sequential approach to flood risk with all built development being located within Flood Zone 1, the low risk Zone, in the first instance.”</u></p> <p>Insert additional policy after SS3 and renumber other policies:</p> <p><u>“POLICY SS4 MANAGING FLOOD RISK</u></p>

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					<p>It is noted that, in reference to the above, the 'Western Urban Expansion' and the relief road corridor both fall within, or partially within, the Parish of Stretton Sugwas.</p> <p>Flood Risk: As stated in the NP document there are two areas of significant flood risk in the area; along the River Wye and around the Yazor Brook. Whilst flood risk is referenced there is no accordant Policy. In conformity with both the National Planning Policy Guidance (NPPG) and Herefordshire Councils Adopted Core Strategy (Policy SD3) we would expect adherence to a Sequential approach to flood risk with all built development being located within Flood Zone 1, the low risk Zone, in the first instance.</p> <p>We would recommend a Flood Risk Management Policy be included within the plan which confirms the following: Development should be located within Flood Zone 1 (Low Risk) and accord with National Planning Policy Guidance (NPPG) and Herefordshire Council's Core Strategy (Policy SD3 - Sustainable Water Management). Where development is deemed necessary within Flood Zones 2 and 3 (in accordance with the Sequential Test) we would expect proposals to demonstrate that they are safe and will not increase flood risk to third parties, with flood-risk betterment provided where possible.</p>		<p><u>DEVELOPMENT SHOULD BE LOCATED WITHIN FLOOD ZONE 1 (LOW RISK). WHERE DEVELOPMENT IS DEEMED NECESSARY WITHIN FLOOD ZONES 2 AND 3 (IN ACCORDANCE WITH THE SEQUENTIAL TEST) PROPOSALS MUST DEMONSTRATE THAT THEY ARE SAFE AND WILL NOT INCREASE FLOOD RISK TO THIRD PARTIES, WITH FLOOD-RISK BETTERMENT PROVIDED WHERE POSSIBLE."</u></p>

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					<p>The above seeks to ensure that all built development is located within Flood Zone 1 in the first instance but that, in accordance with the NPPG and Herefordshire Councils own flood risk Policy, where it is sequentially demonstrated that such development has to be within Flood Zones 2 or 3, any proposals will be safe and not increase flood risk. Whilst conformity with the Core Strategy is vital with regards to development and flood risk there may be scope to add a locally specific flood risk policy point to address any flood risk issues the Parish has. Discussions with Herefordshire Council and their land drainage team may identify such flood risk improvements. Since the imposition of the Flood and Water Management Act the management of surface water falls under the jurisdiction of the Lead Local Flood Authority (LLFA), in this instance Herefordshire Council.</p> <p>Foul Water Drainage: With regards to foul drainage all new development throughout the Plan area should be assessed against the capacity of local infrastructure. In this instance we would expect consultation with Welsh Water to ensure that the scale of development can be accommodated. As you are aware, as part of the WSC update/addendum, an assessment of Sewage Treatment Works within the County was undertaken with data collated by both Welsh</p>		

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
					<p>Water and ourselves. The Plan should make reference to this information to provide re-assurance that there is adequate foul infrastructure to accommodate growth throughout the plan period. Whilst, due to the limited scale of development proposed, this is unlikely to cause problems clarification should be sought and provided in any future revisions to the Plan.</p> <p>To further assist you in finessing your final submission I have attached a copy of our Neighbourhood Plan Pro-Forma which contains additional information relating to the above issues and what we would expect to see in your document.</p> <p>I trust the above is of assistance at this time. We would be happy to co-operate further on the areas detailed above prior to the proposed Neighbourhood Plan adoption. Please can you also copy in any future correspondence to my team email address at SHWGPlanning@environment-agency.gov.uk</p> <p>Yours faithfully Mr. Graeme Irwin</p>		
Coal Authority Ref. No 22	All			No comment	Stretton Sugwas Neighbourhood Development Plan Thank you for consulting The Coal Authority on the above.	Noted.	No change,

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
					<p>Having reviewed your document, I confirm that we have no specific comments to make on it at this stage.</p> <p>We look forward to continuing to receive your emerging planning policy related documents; preferably in electronic format. For your information, we can receive documents via our generic email address planningconsultation@coal.gov.uk, on a CD/DVD, or a simple hyperlink which is emailed to our generic email address and links to the document on your website. Alternatively, please mark all paper consultation documents and correspondence for the attention of the Planning and Local Authority Liaison Department.</p> <p>Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our departmental direct line (01623 637119).</p> <p>Yours sincerely</p>		
<p>Natural England</p> <p>Ref 23 (late)</p>	<p>All</p>			<p>Comment</p>	<p>Re: Stretton Sugwas Draft Neighbourhood Development Plan (NDP)</p> <p>Thank you for your consultation on the above dated and received by Natural England on 15 September 2015.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that</p>	<p>Accepted.</p> <p>Amend Plan.</p>	<p>Amend Plan.</p> <p>Amend para 1.7 to include: <u>“The adopted Herefordshire Local Plan Core Strategy includes policies such as Policy LD2 that protect the River Wye SAC/SSSI and other</u></p>

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
					<p>the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Stretton Sugwas Neighbourhood Plan Part of the River Wye Special Area of Conservation (SAC) / Site of Special Scientific Interest (SSSI) falls within the plan area. As long as the Neighbourhood Development Plan (NDP) is in line with the Herefordshire Core Strategy the NDP can rely on the policies within the core strategy to ensure no likely significant effects. We would advise you consider making reference to the now adopted Herefordshire Local Plan (Core Strategy) and the policies within it that protect the River Wye SAC/SSSI.</p>		<p><u>wildlife and biodiversity assets.</u>"</p>
Ref No 24			SS1, SS2, SS3, SS4	Comment	<p>The Habitats Regulations Assessment Report advises that certain policies (Policies SS1, SS2, SS3 and SS4 in particular) should be strengthened to protect the River Wye SAC and we would generally support this. An example of additional policy wording is set out below:</p> <ul style="list-style-type: none"> - "Development can only proceed where any adverse impacts on 	<p>Accepted.</p> <p>Include additional wording as proposed to Policies SS1, SS2, SS3 and SS4.</p>	<p>Amend Plan.</p> <p>Insert additional wording as proposed to Policies SS1, SS2, SS3, SS4:</p> <p><u>"DEVELOPMENT CAN ONLY PROCEED WHERE ANY ADVERSE IMPACTS ON</u></p>

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
					<p>designated sites can be avoided or mitigated.</p> <ul style="list-style-type: none"> - Development will only be permitted when it does not compromise the ability of the nutrient management plan to deliver the necessary overall nutrient reductions along those stretches of the River Wye SAC which are already exceeding water quality targets.” 		<p><u>DESIGNATED SITES CAN BE AVOIDED OR MITIGATED.</u></p> <p><u>DEVELOPMENT WILL ONLY BE PERMITTED WHEN IT DOES NOT COMPROMISE THE ABILITY OF THE NUTRIENT MANAGEMENT PLAN TO DELIVER THE NECESSARY OVERALL NUTRIENT REDUCTIONS ALONG THOSE STRETCHES OF THE RIVER WYE SAC WHICH ARE ALREADY EXCEEDING WATER QUALITY TARGETS.”</u></p>
Ref No 25			SS2	Comment	<p>Policy SS2 New Development and Protection of Green Gaps Brownfield land can have a high ecological value. Consideration should be given to adding in additional wording to the policy for example:</p> <p><i>The re-development and re-use of existing brownfield sites and buildings has a priority over greenfield sites, provided it does not have a high environmental value.</i></p> <p>Further guidance on the ecological value of brownfield land is listed below: UK Biodiversity Action Plan- Priority Habitat Descriptions and Mosaic Approach - Brownfield or Open Mosaic Habitat On Previously Developed Land.</p>	<p>Accepted.</p> <p>Include additional wording as proposed.</p>	<p>Amend Plan.</p> <p>Amend Policy SS2 as suggested: “THE RE-DEVELOPMENT AND RE-USE OF EXISTING BROWNFIELD SITES AND BUILDINGS HAS A PRIORITY OVER GREENFIELD SITES, <u>PROVIDED THE SITE OR BUILDINGS DO NOT HAVE A HIGH ENVIRONMENTAL VALUE”</u></p>
Ref No 26			SS3	Comment	Policy SS3 Landscape Design Principles	Accepted.	Amend Plan.

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					Paragraph 2 states that “Local habitats and wildlife should be preserved and enhanced”, it may be helpful to specify habitats and or specific sites. For example ancient woodland or local wildlife sites.	Include additional wording a proposed.	Amend Policy SS3 as suggested to: “LOCAL HABITATS AND WILDLIFE <u>SUCH AS ANCIENT WOODLAND AND LOCAL WILDLIFE SITES</u> SHOULD BE PRESERVED AND ENHANCED.”
Ref No 27			SS3	Comment / Support	<p>We welcome this policy and advise expanding it to include more about green infrastructure, to protect existing green infrastructure within the boundary of the plan area and to promote creation of new green infrastructure if new development proposals come forward. Such green infrastructure could include protection and creation of traditional orchards, woodland and wildlife corridors and other environmental assets in the area to preserve and expand the existing ecosystem network.</p> <p>You may find it helpful to refer to the Herefordshire Green Infrastructure Study (2010).</p> <p>Multi-functional green infrastructure is important to underpin the overall sustainability of a development by performing a range of functions including flood risk management, the provision of accessible green space, climate change adaptation and supporting biodiversity. An</p>	<p>Accepted.</p> <p>Include additional wording as proposed.</p>	<p>Amend plan.</p> <p>Insert additional text:</p> <p>New 6.1.12 and renumber other paragraphs:</p> <p><u>“Multi-functional green infrastructure is important to underpin the overall sustainability of a development by performing a range of functions including flood risk management, the provision of accessible green space, climate change adaptation and supporting biodiversity. An example of a green infrastructure provision is sustainable drainage systems. These can deliver benefits for people and for wildlife and make a valuable contribution to the local</u></p>

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					<p>example of a green infrastructure provision is sustainable drainage systems. These can deliver benefits for people and for wildlife and make a valuable contribution to the local green infrastructure network. Actions such as re-naturalising watercourses can also bring multifunctional benefits, including benefiting flood attenuation. Woodland planting can also help mitigate flooding, see Woodland for Water: Woodland measures for meeting Water Framework Directive objectives for further information. Research indicates that green roofs/living roofs can reduce run-off and thereby the risk of surface water flooding; reducing the requirement for heating and air-conditioning; and providing habitat for wildlife. Further information can be found here: http://livingroofs.org/.</p> <p>Proposals may present opportunities to incorporate features such as roosting opportunities for bats, the installation of bird nest boxes or the use of native species in the landscape planting and we advise including within a green infrastructure policy the requirement for ecological enhancements.</p> <p>We advise including policy to protect specifically priority habitat (for example the traditional orchards, parkland and deciduous woodland) and other environmental assets in</p>		<p><u>green infrastructure network. Actions such as re-naturalising watercourses can also bring multifunctional benefits, including benefiting flood attenuation. Woodland planting can also help mitigate flooding.</u></p> <p><u>Research indicates that green roofs/living roofs can reduce run-off and thereby the risk of surface water flooding; reducing the requirement for heating and air-conditioning; and providing habitat for wildlife. Proposals may present opportunities to incorporate features such as roosting opportunities for bats, the installation of bird nest boxes or the use of native species in the landscape planting. Natural England advised during the Regulation 14 consultation that a green infrastructure policy should be included requiring ecological enhancements such as protection and creation of</u></p>

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
					the area to preserve the existing eco-system network.		<p><u>traditional orchards, woodland and wildlife corridors and other environmental assets in the area to preserve and expand the existing ecosystem network.</u> “</p> <p>Amend title of SS3 to “LANDSCAPE DESIGN PRINCIPLES <u>AND GREEN INFRASTRUCTURE</u>”</p> <p>Insert additional wording to bullet pt 2 and move to end under subheading “GREEN INFRASTRUCTURE”. Renumber points. : “<u>DEVELOPMENT PROPOSALS ARE REQUIRED TO INCLUDE MULTI FUNCTIONAL GREEN INFRASTRUCTURE SUCH AS SUSTAINABLE DRAINAGE, RE-NATURALISING WATER COURSES, WOODLAND PLANTING, GREEN ROOFS AND BIRD AND BAT BOXES.</u></p> <p><u>PRIORITY HABITAT SUCH AS TRADITIONAL ORCHARDS,</u></p>

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
							<u>PARKLAND AND DECIDUOUS WOODLAND AND OTHER ENVIRONMENTAL ASSETS IN THE AREA ARE PROTECTED TO PRESERVE THE EXISTING ECO-SYSTEM NETWORK.”</u>
Ref No 28			All	Comment	<p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p> <p>For any queries relating to the specific advice in this letter only please contact Gillian Driver on 0300 060 4335. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk. We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.</p> <p>Yours sincerley</p>	Noted.	No change.

5.0 Stretton Sugwas Neighbourhood Development Plan Update 2018/2019

- 5.1 The NDP was not submitted in 2015/2016 as originally proposed. This was due to changes to the membership of the NDP Steering Group at that time and the need to resource further consultation activity to inform the identification of settlement boundaries at Stretton Sugwas and Swainshill as advised by Herefordshire Council.
- 5.2 The work on the NDP was therefore parked for some time, and then picked up again in 2018 following renewed commitment from the Parish Council to complete the process with the support of new members of the Steering Group.
- 5.3 Following the re-appointment of planning consultants Kirkwells, the former submission (most up to date) version of the NDP was reviewed and updated. The Group decided to undertake some further informal consultation on options for settlement boundaries at Swainshill and Stretton Sugwas, before finalising the Plan and publishing it for a further 6 weeks period of formal consultation (Regulation 14).

Informal Public Consultation - Summer 2018

- 5.4 Different options for the proposed settlement boundaries were considered at two public consultation events at the Village Hall on Friday, 15th June from 6 pm to 9 pm and on Saturday, 16th June from 9 am to 12 noon. The consultation was promoted using flyers delivered to local households - see **Appendix III**. The revised and updated Draft NDP was also published for any further comments until the end of June 2018. Maps showing the different options were provided in Appendix I of the NDP. There was a low level of responses but the results showed the following level of support:

Swainshill - Sugwas Pool

Option 1 2

Option 2 3

Swainshill - Church Road

Option 1 3

Option 2 2

Stretton Sugwas

Option 1 4

Option 2 5

5.5 The steering group took into consideration the results of the public consultation (including any discussions with parishioners at the events) and proposed the following settlement boundaries in the Regulation 14 Draft Plan:

Stretton Sugwas (former Option 2)

The settlement boundary included the existing core of Stretton Sugwas with Roman Way and Morningside as well as the Travellers Rest which has planning consent for 8 dwellings. The boundary also includes land to the north of the Travellers Rest on both sides of the A480, for which planning applications are anticipated. At an informal public meeting for the parish, the older residents were supportive of land being developed to provide affordable housing. Therefore some of the land identified in the Strategic Housing Land Availability section of the Local Plan Evidence Base has been included within the settlement boundary. This comprises land to the rear and south of Stretton Sugwas Academy.

Swainshill—Sugwas Pool (former Option 2)

The settlement comprises ribbon development along the A438 between the parish boundary and Brockhall Coppice as well as ribbon development down Sugwas Pool Lane. There have been opportunities to utilise infill plots within the ribbon development. Most of the infill plots have been developed or have planning consent. The settlement boundary is defined by the property boundaries of the houses forming the ribbon development.

Swainshill—Church Road (former Option 1)

The settlement boundary encloses the existing built environment together with land at the Lakes where there is planning consent for 8 houses. No further expansion on to green field land is envisaged.

5.6 This consultation was used to inform and justify Draft Policy SS7 and the accompanying maps identifying settlement boundaries.

6.0 Second Regulation 14 Public Consultation - Monday 10th December 2018 to 5pm Monday 4th Feb 2019

- 6.1 The Draft Neighbourhood Development Plan (NDP) for Stretton Sugwas Parish was published for 8 weeks formal public consultation (Regulation 14) from Monday 10th December 2018 to 5pm Monday 4th Feb 2019.
- 6.2 Copies of the Stretton Sugwas Draft NDP could be viewed and downloaded from the Parish Council's website www.strettonsugwasparishcouncil.co.uk . Screenshots are provided in **Appendix IV**.
- 6.3 Hard copies were placed in Stretton Sugwas Village Hall and Stretton Sugwas Church and were available on request to borrow from the Parish Council Clerk at the address shown below.
- 6.4 Responses were invited in writing, by email or using the Response Form which was provided on the website, and was available as a hard copy from Stretton Sugwas Village Hall and Stretton Sugwas Church. All responses to were returned to the Clerk to the Parish Council.
- 6.4 Copies of the letter / email, list of organisations contacted, including consultation bodies, response form and publicity are provided in **Appendix IV**.

7.0 Summary of Responses

- 7.1 Responses were submitted by 7 organisations. These included overall support and some detailed suggestions for minor amendments to policy wording and a deletion of a policy on Green Infrastructure due to duplication with the Core Strategy from Herefordshire Council and supportive comments from Historic England. Two landowner / developers submitted comments: the Duchy of Cornwall provided supportive comments and a suggestion for an amendment to a settlement boundary (however this was outside the neighbourhood and parish area) and some detailed comments from Gladman suggesting changes to policy wording, some of which have been taken on board. A neighbouring parish council Credenhill noted that a flood map was out of date, and this has been replaced with the most up to date version available from Herefordshire Council.
- 7.2 Overall the changes to the submission NDP have been fairly minor in nature. More detailed information is provided in Table 2.

Table 2 Responses to Second Regulation 14 Pubic Consultation, December 2018 - February 2019

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
1. Herefordshire Council							
1.1 Neighbourhood Planning 28/1/19	All	1.11	SS1 SS3 SS4 SS7	Comment	<p>Overall a well-structured plan, updates to providing settlement boundaries to the two identified settlements for proportionate growth are welcomed.</p> <p>Update para 1.11- As of April 2018- 2 have been built and 33 have been granted planning permission. This leave a residual figure of -4.</p> <p>Policy SS1-Could further define, breaking the skyline? Maybe rephrase this for clarity.</p> <p>Policy SS3-Instead of 'required' could replace with 'encouraged'.</p> <p>Policy SS4- Add 'Where possible' development should be located within flood zone 1.</p> <p>Policy SS7-please note that restricting development up to 11 units will miss out potential affordable housing in the settlements</p>	<p>Accepted.</p> <p>Amend NDP as suggested.</p>	<p>Amend NDP</p> <p>Update para 1.11 to:</p> <p><u>"There have been a number of planning consents and completed developments for new housing in Stretton Sugwas NDP area since 2011 (the start of the plan period) and these count towards the housing target growth figure as set out in the adopted Herefordshire Local Plan Core Strategy 2011 - 2031. As of April 2018 two houses have been built in the parish and 33 have been granted planning permission. This leave a residual figure of -4, meaning that the housing target has been exceeded."</u></p>

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
							<p>Update para 6.44 with above information.</p> <p>Policy SS1- amend first sentence of second paragraph to:</p> <p>" <u>Development should be designed to take account of local topography and should not break the skyline when viewed from public rights of way or highways within the parish</u>"</p> <p>Policy SS3 is deleted - see below.</p> <p>Policy SS4- Add '<u>Where possible</u>' development should be located within flood zone 1.</p> <p>Policy SS7 increase to 12 units and check with other policies for consistency.</p>
1.2	All			No comments	Development Management No comments received	Noted.	No change.

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
					<p>Planning Policy 1/1/19 No conformity issues raised. Please find full response in appendix 1.</p> <p>Landscape / Archaeology/ conservation No comments received.</p> <p>Strategic Housing No comments received.</p> <p>Economic Development No comments received.</p>		
1.3			SS6	Comment	<p>Environmental Health 29/1/19</p> <p>Our comments are with reference to the potential impact on the amenity – in terms of noise, dust, odours or general nuisance to residential occupants that might arise as a result of any new residential development or any new commercial or industrial development.</p>	<p>Noted and Accepted.</p> <p>Amend NDP as suggested.</p>	<p>Amend NDP.</p> <p>Amend Policy SS6 para 3 to: <u>" Adequate noise attenuation measures and others measures where necessary are provided to prevent nuisance and measures to mitigate the effects of external lighting</u> " –</p>

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
					<p>In this context, I would like to suggest an amendment to para 3 in SS6 which currently reads ' Adequate noise attenuation measures and measures to mitigate the effects of external lighting are provided' to say 'Adequate noise attenuation measures, others measures where necessary to prevent nuisance and measures to mitigate the effects of external lighting are provided'</p> <p>Our department has no objections to new housing from a noise and nuisance aspect of new residential development within the settlement boundary of Stretton Sugwas.</p> <p>However, new development along the A438 at Swainshill will be impacted by road traffic noise. We would expect to see the sites along this stretch of road to be subject to a road traffic noise risk assessment and noise factors taking into account in the design and layout of any new residential site.</p> <p>SS9 Housing in the open countryside, we suggest a further amendment 'Preference will be given to the sensitive conversion of existing redundant buildings and re-use of brownfield sites' the amendment to read 'provided that the amenity of new</p>		<p>Add additional paragraph to Policy SS7:</p> <p><u>"New development along the A438 at Swainshill will be impacted by road traffic noise and any proposals along this stretch of road will be subject to undertake a road traffic noise risk assessment and noise factors, taking into account in the design and layout of any new residential site."</u></p> <p>Amend Policy SS9:</p> <p>Amend paragraph 3:</p> <p>"Preference will be given to the sensitive conversion of existing redundant buildings and re-use of brownfield sites <u>provided that the amenity of new residential occupants will be not be adversely impacted by existing agricultural or commercial activity "</u></p>

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
					residential occupants will be not be adversely impacted by existing agricultural or commercial activity.		
1.4	All			Comment	<p>Environmental Health</p> <p>Air Water protection</p> <p>22/1/19</p> <p>I refer to the above and would make the following comments with regard to the above proposed development plan.</p> <p>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.</p> <ul style="list-style-type: none"> Given that no other specific sites have been identified in the plan I am unable to provide comment with regard to potential contamination. <p>General comments:</p> <p>Developments such as hospitals, homes and schools may be considered 'sensitive' and as such consideration should be given to</p>	<p>Noted.</p> <p>These are detailed matters and should be addressed through the development management process if and when planning applications come forward.</p>	No change.

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
					<p>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.</p> <p>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.</p> <p>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.</p> <p>These comments are provided on the basis that any other developments would</p>		

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
					be subject to application through the normal planning process.		
1.5	All			No comments	Parks and Countryside No comments received Education No comments received	Noted.	No change.
1.6		2.6	SS5 SS8 SS10	Comments	Transportation and Highways 31/1/19 2.6- This is now superceded. The red route was agreed to by the cabinet in July 2018. Policy SS5- Need to include provision for cycle storage and will need to ensure safe access to highway network. PARA 9 L2-I would strongly suggest this is clarified with highway development control to ensure it is within our design guide. Policy SS8- Point 5 Can also support walking and cycling. Policy SS10-I1. Check this is within Stretton Sugwas Parish.	Accepted. Amend and Updated NDP as suggested. Re Policy SS5 criterion 9 - no comments were submitted by Development Management.	Amend NDP. Update paragraph 2.6 and map. Delete last sentence "The route has not yet been finalised ..." and replace with: <u>"The route of the new proposed Hereford Bypass was approved by Hereford Council in July 2018. The Bypass is still undergoing technical assessment and further public consultation will be undertaken in 2019. For further information see Hereford Transport Package (reference footnote</u>

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
							<p>https://www.herefordshire.gov.uk/info/200196/roads/252/hereford_2020/4 ."</p> <p>Amend Policy SS5: Add further sentence to criterion 9:</p> <p>" <u>Schemes should include provision for cycle storage and will need to ensure safe access to highway network.</u> "</p> <p>Amend Policy SS8 criterion 5 to:</p> <p>" <u>Development should seek to reduce the environmental impacts of traffic and transport and support walking and cycling.</u>"</p> <p>Amend Policy SS10, first sentence to:</p>

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
							" Proposals for any new roads and in particular the proposed Hereford Bypass within Stretton Sugwas Parish ..."
1.7	All			No comments	Waste No comments received	Noted.	No change.
1.8 Strategic Planning Team	All			Neighbour- hood Develop- ment Plan (NDP) – Core Strategy Conformity Assessment	<p>Policy SS1 Protecting Sensitive Landscapes</p> <p>Policy LD1 –Landscape and townscape, Policy LD3 – Green infrastructure, Policy LD2 – Biodiversity and geodiversity, Policy SD3 – Sustainable water management and water resources continued</p> <p>(Y)</p> <p>Draft Policy SS2 Landscape Design Principles</p> <p>Policy LD3 – Green infrastructure</p> <p>Policy SS6 - Environmental quality and local distinctiveness,</p>	<p>Noted and accepted.</p> <p>Delete Policy SS3 and supporting text 6.1.11 to 6.1.13 as duplicates Core Strategy Policy and does not add any local detail.</p>	<p><u>Delete Policy SS3 and supporting text and renumber others.</u></p> <p>Amend Policy SS6 Criterion 4 to:</p> <p><u>" The amenity of nearby residential occupants will be protected from any adverse impacts resulting from additional traffic such as noise, disturbance and pollution."</u></p>

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
					<p>Policy LD1 –Landscape and townscape, Policy SS4 - Movement and transportation</p> <p>(Y)</p> <p>Draft Policy SS3 Green Infrastructure</p> <p>Policy LD3 – Green infrastructure</p> <p>(Y)</p> <p>The policy is generic and tends to add little to the CS equivalent. It broadly echoes the same criteria without any attempt at tailoring, to fit the localised context or address local issues. This is not a conformity issue but Inclusion of this policy seems superfluous, when the issues are already addressed in the same manner in the CS policy.</p> <p>Draft Policy SS4 Managing Flood Risk</p> <p>Policy SD3 – Sustainable water management and water resources,</p> <p>(Y)</p> <p>Draft Policy SS5 Building Design Principles and Protecting Heritage</p>		

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
					<p>Policy SS6 - Environmental quality and local distinctiveness,</p> <p>Policy LD4 – Historic environment and heritage assets,</p> <p>Policy SD1 – Sustainable design and energy efficiency,</p> <p>Policy RA5 – Re-use of rural buildings,</p> <p>SS1 - Presumption in favour of sustainable development</p> <p>(Y)</p> <p>Draft Policy SS6 Managing New Business Development in Former Agricultural Buildings</p> <p>SS1 - Presumption in favour of sustainable development,</p> <p>RA5 – Re-use of rural buildings,</p> <p>RA6 - Rural economy,</p> <p>MT1 -Traffic management, highway safety and promoting active travel</p> <p>(Y)</p> <p>Please note that the NDP cannot put in place Traffic Regulation Orders.</p>		

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
					<p>Draft Policy SS7 Settlement Boundaries</p> <p>SS1 - Presumption in favour of sustainable development, RA1 – Rural housing distribution</p> <p>(Y)</p> <p>Draft Policy SS8 Criteria for New Housing Sites</p> <p>SS1 - Presumption in favour of sustainable development</p> <p>SS2 – Delivering new homes</p> <p>RA1 – Rural housing distribution</p> <p>RA2 – Herefordshire’s villages</p> <p>H3 – Ensuring an appropriate range and mix of housing</p> <p>MT1 – Traffic management, highway safety</p> <p>and promoting active travel</p>		

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					<p>(Y)</p> <p>Draft Policy SS9 Housing in the Countryside</p> <p>RA3 – Herefordshire’s countryside, H2 – Rural exception sites</p> <p>(Y)</p>		
2.0 Highways England	All			Comment	<p>Consultation on the pre-submission version of the Stretton Sugwas Neighbourhood Plan</p> <p>We welcome the opportunity to comment on the Pre-submission version of the Draft Stretton Sugwas Neighbourhood Plan which covers the period 2018-2031. It is noted that the document provides a vision for the future of the area and sets out a number of key objectives and planning policies which will be used to help determine planning applications.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient</p>	Noted.	No change.

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					<p>operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Stretton Sugwas Neighbourhood Plan, our principal interest is in safeguarding the operation of the A49 which routes 2 miles east of the Plan area.</p> <p>We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Plan for the parish of Stretton Sugwas is required to be in conformity with the adopted Herefordshire Local Plan Core Strategy (2011 – 2031) and this is acknowledged within the document.</p> <p>We note that Stretton Sugwas and Swainshill is identified as part of the Hereford rural area in the Core Strategy and has been allocated a proportionate scale of development growth of at least 31 new houses in small developments over the Plan period. Considering the limited level of growth proposed across the Neighbourhood Plan area we do not expect that there will be any impacts on the operation of the SRN.</p>		

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					We have no further comments to provide and trust that the above is useful in the progression of the Stretton Sugwas Neighbourhood Plan.		
3.0 Welsh Water	All		SS1 SS3 SS4	Comment / Support	<p>REGULATION 14 PUBLIC CONSULTATION ON STRETTON SUGWAS NEIGHBOURHOOD DEVELOPMENT PLAN, JANUARY 2019</p> <p>I refer to your email dated the 6th December 2018 regarding the above consultation. Welsh Water appreciates the opportunity to respond and we offer the following representation which we hope you will consider in your deliberations:</p> <p>Given that the Neighbourhood Development Plan (NDP) has been prepared in accordance with the Herefordshire Council Core Strategy, we are generally supportive of the aims, objectives and policies set out.</p> <p>We particularly welcome the content of Draft Policy SS1, which seeks to ensure that the targets set out in the Nutrient Management Plan are met. We also welcome the provisions of Draft Policies SS3 and SS4 in ensuring that sustainable</p>	Noted.	No change.

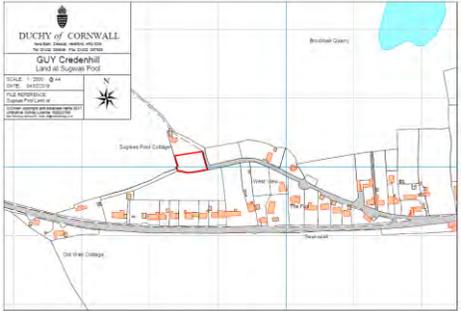
Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
					<p>drainage is required in all new development. This will reduce the risk of surface water flooding, as well as ensuring there is sufficient capacity in the public sewerage network for foul flows.</p> <p>We understand that the settlements of Stretton Sugwas and Swainshill are the main focus of development within the NDP, but that owing to completions and commitments there is a residual requirement of 2 dwellings and as such the NDP does not propose any allocations.</p> <p>Wastewater treatment</p> <p>As you will no doubt be aware, the settlements of Stretton Sugwas and Swainshill are served by the Hereford Eign Wastewater Treatment Works (WwTW). There are no issues with the WwTW accommodating the foul only flows from the level of growth proposed within the settlement, including potential windfalls over and above the residual requirement.</p> <p>We hope that the above information will assist you as you continue to progress the Neighbourhood Plan. In the meantime, should you require any further</p>		

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					information please do not hesitate to contact us at....		
4.0 Historic England	All		SS1 SS2 SS5	Support	<p>STRETTON SUGWAS NEIGHBOURHOOD PLAN - REGULATION 14 CONSULTATION</p> <p>Thank you for the invitation to comment on the draft Neighbourhood Plan.</p> <p>Historic England is supportive of both the content of the document and the vision and objectives set out in it.</p> <p>We are pleased to note its’ emphasis on local distinctiveness and the maintenance of rural character and we consider it takes a suitably proportionate approach to the historic environment of the Parish.</p> <p>We particularly commend the thorough approach taken to, inter alia, protecting sensitive landscapes (Policy SS1) landscape design (Policy SS2) and the retention of locally important buildings and orchards and the protection of archaeological remains. Equally commendable is the approach taken to Building Design (Policy SS5) and historic farmsteads and the emphasis placed on the importance of avoiding “generic schemes” in the design of new housing.</p>	Noted.	No change.

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					<p>Overall the plan reads as a well-considered, concise and fit for purpose document.</p> <p>Beyond those observations we have no further substantive comments to make on what Historic England considers is a good example of community led planning.</p> <p>I hope you find this advice helpful.</p>		
5.0 Credenhill PC	All			Comment	<p>Hi,</p> <p>Thanks for sending us this, I will forward it to the council for review.</p> <p>One thing too note that you may not aware if is that the flood zone data around Yazor brook is inaccurate, map on page 8 of your document (it is inaccurate on the EA website as well). The reason for this is that it has not been updated since the implementation of the flood defences installed at the community centre in Credenhill (Flood Alleviation Scheme); I will forward my correspondence with the EA on this matter.</p>	<p>Noted.</p> <p>The Map on page 8 was provided by Herefordshire Council and includes the most up to date information at that time.</p> <p>The Map could be replaced by the SEA Map 2 in the Environmental Report for: Stretton Sugwas Neighbourhood Area November 2018, but planning applications will be required to use the most up to date flood map at any one time and this information is available at https://flood-map-for-planning.service.gov.uk/ .</p>	<p>Amend NDP.</p> <p><u>Replace Map on p8 with more up to date one p26 Appendix 1 Environmental Report for: Stretton Sugwas Neighbourhood Area November 2018 and update text in 1.7 to refer to the most up to date SEA Report.</u></p>

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					<p>Essentially the new flood model data is currently held by Herefordshire Council and the EA are waiting for this information before incorporating it into there online maps - the areas that are flood zone 3 on your map are now more likely to be flood zone 1 or 2 at worst - this is because the overflow at Credenhill is set so low & the pipe diameter (2m) is large enough to cope with significant flood events - everything downstream is now fully protected.</p> <p>I will let you know if there are any comments from the parish council</p>		
6.0 Duchy of Cornwall	All			Support	<p>The Duchy of Cornwall welcomes the publication of the Draft Neighbourhood Development Plan (December 2018), which is well written. We welcome the inclusion of the design policies which are in tune with the Duchy’s approach to reflecting local distinctiveness and character in new developments. We note that the residual requirement for housing is currently two dwellings (depending on whether current planning consents are implemented in time) but it is prudent to allocate additional land in case housing</p>	<p>Noted.</p> <p>Proposed change not accepted.</p> <p>The proposed amendment to the settlement boundary at Swainshill lies outside the NDP and parish boundary and so cannot be addressed in the Stretton Sugwas NDP.</p>	No change.

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					<p>requirements increase in the next Plan period for the Herefordshire Local Plan, which National Planning Policy requires to be reviewed every five years.</p> <p>We support the Settlement Boundary for Stretton Sugwas as drawn on Map 6, which includes the opportunity for small scale development well related to the settlement each side of the A480.</p> <p>However, there is an opportunity for a single dwelling at Sugwas Pool well related to existing development. We would ask that Map 7 (Swainshill Settlement Boundary) be amended to include land outlined in red on the enclosed plan, which would be brought forward in keeping with the local area and Neighbourhood Plan policy.</p>		

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7.0 Gladman	All			Comment	<p>This letter provides Gladman Developments Ltd (Gladman) representations in response to the draft version of the Stretton Sugwas Neighbourhood Plan (SSNP) under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy. Gladman has considerable experience in neighbourhood planning, having been involved in the process during the preparation of numerous plans across the country, it is from this</p>	Noted.	No change.

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					experience that these representations are prepared.		
7.1	All			Comments.	<p>Legal Requirements</p> <p>Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the SSNP must meet are as follows:</p> <p><i>(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.</i></p> <p><i>(d) The making of the order contributes to the achievement of sustainable development.</i></p> <p><i>(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</i></p>	Noted. The Basic Conditions Statement provides in some detail how the NDP meets the required basic conditions. This in line with National Planning Practice Guidance Neighbourhood Planning paragraph 066 which sets out that <i>'The basic conditions statement is likely to be the main way that a qualifying body can seek to demonstrate to the independent examiner that its draft neighbourhood plan or order meets the basic conditions.'</i>	No change.

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					<i>(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.</i>		
7.2	All			Comment	<p>Revised National Planning Policy Framework</p> <p>On the 24th July 2018, the Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework. The first revision since 2012, it implements 85 reforms announced previously through the Housing White Paper.</p> <p>Paragraph 214 of the revised Framework makes clear that the policies of the previous Framework will apply for the purpose of examining plans where they are submitted on or before 24th January 2019. Given the date of this consultation the submission of the SSNP will occur after this date, and therefore the comments below reflect the relationship between Neighbourhood Plans and the National Planning Policy Framework adopted in 2018.</p>	<p>Noted.</p> <p>The Basic Conditions Statement sets out how the NDP has regard to national planning policies and advice and refers to the revised NPPF published in July 2018.</p>	No change.
7.3				Comment	<p>National Planning Policy Framework and Planning Practice Guidance</p>	Noted.	No change.

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					<p>The National Planning Policy Framework (the Framework) sets out the Government’s planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role they play in delivering sustainable development to meet development needs.</p> <p>At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through plan-making and decision-taking. This means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.</p> <p>The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account of and most up-to-date evidence</p>		

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					<p>of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.</p> <p>The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 13 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.</p> <p>Paragraph 15 further makes clear that neighbourhood plans should set out a succinct and positive vision for the future of the area. A neighbourhood plan should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency.</p> <p>Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding</p>		

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					<p>positively to the wider opportunities for growth.</p> <p>Paragraph 29 of the Framework makes clear that a neighbourhood plan must be aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.</p>		
7.4				Comment	<p>Planning Practice Guidance</p> <p>It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements of the wider area as confirmed in an adopted development plan. The Framework requirements have now been supplemented by the publication of Planning Practice Guidance (PPG).</p> <p>On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.</p>	Noted.	No change.

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					<p>On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG, providing clarity on the measures a qualifying body should take to review the contents of a neighbourhood plan where the policy evidence base becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying body's anticipated timescales in this regard.</p> <p>Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded.</p>		
7.5				Comment	<p>Relationship to Local Plan</p> <p>To meet the requirements of the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.</p>	<p>Noted.</p> <p>Herefordshire Council has provided detailed comments and suggested some minor amendments to policies to bring the wording more in line with policies in the Core Strategy. Herefordshire Council has also undertaken an</p>	No change.

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					<p>The adopted development plan relevant to the preparation of the Stretton Sugwas Neighbourhood Plan area, and the development plan which the SSNP will be tested against is the Herefordshire Core Strategy (HCS). This document was adopted in October 2015 and sets out the visions, objectives, spatial strategy and overarching policies to guide development in the Herefordshire from 2011 – 2031.</p> <p>Policy SS2 sets out a minimum requirement of 16,500 homes that will be delivered over the plan period with a reliance on the rural areas to deliver a minimum 5,300 dwellings over the plan period that will be delivered through either neighbourhood planning or the emerging Rural Areas and Site Allocations Development Plan Document (RASA DPD). Policy RA1 of the HCS identifies an indicative housing growth target of 18% for the Hereford Rural HMA, inclusive of Stretton Sugwas.</p>	<p>assessment of general conformity - see 1.8 above.</p>	
7.6			SS3	Comment	<p>Policy SS3 of the HCS determines that where housing completions fall below the annual requirement this could lead to one of the following mechanisms being introduced;</p>	<p>Noted. Herefordshire Council has confirmed that the minimum housing target for Stretton Sugwas has been exceeded through completions (2) and existing</p>	<p>No change.</p>

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					<p>- A partial review of the Local Plan</p> <p>- Preparation of new Development Plan Documents or,</p> <p>- utilising evidence from the Strategic Housing Land Availability Assessment to identify additional housing land.</p> <p>With this in mind and given that Herefordshire Council cannot demonstrate a 5-year supply, Gladman suggest sufficient flexibility is provided in the policies of the plan to safeguard the SSNP from conflicting with future development proposals should they be required.</p>	<p>commitments (33) giving a residual figure of -4.</p> <p>The NDP includes a suitable degree of flexibility to allow for further development by supporting further development subject to criteria, within identified settlement boundaries.</p>	
7.7	All			Comment	<p>Stretton Sugwas Neighbourhood Plan</p> <p>This section highlights the key issues that Gladman would like to raise with regards to the content of the SSNP as currently proposed. It is considered that some policies do not reflect the requirements of national policy and guidance, Gladman have therefore sought to recommend a series of alternative options that should be explored prior to the Plan being submitted for Independent Examination.</p>	Noted.	No change.

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7.8			SS1	Comment	<p>Draft Policy SS1 Protecting Sensitive Landscapes</p> <p>Gladman are concerned with the following reference in policy SS1; <i>“Development will only be permitted when...”</i>. We would like to remind the Parish Council that it is Herefordshire Council who is the decision maker and therefore the neighbourhood plan should not be using the term permitted. We recommend a simple change so the policy reads as follows; <i>“Development will only be supported when...”</i>.</p>	<p>Not accepted.</p> <p>This wording was provided for the policy in the first Regulation 14 public consultation by consultation body Natural England (Ref No 24 in Table 1 of the Consultation Statement).</p>	No change.
7.9			SS1	Comment	<p>In addition, Gladman submit the policy as currently drafted lacks clarity and consistency. The revised Framework is clear that policies should be clearly written and unambiguous, to allow the decision maker to apply a policy confidently. In this case policy SS1 states development proposals which impact on medium and high landscape sensitive areas will be expected to adhere to certain criteria, the policy then directs the reader in the direction of map 5. Map 5 has four categories of landscape sensitivity; ‘medium low’, ‘medium’, ‘high medium’ and ‘high’. Gladman believe the</p>	<p>Accepted.</p> <p>Amend Policy SS1 to provide greater clarity linking to Map 5.</p>	<p>Amend Policy SS1.</p> <p>Amend first sentence to: “Development proposals which impact on areas of <u>medium, high medium and high sensitivity landscapes as identified on Map 5...</u>”</p>

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					policy as currently drafted is unclear whether it is referring to all 4 categories of landscape sensitivity. Gladman suggest revising this policy to ensure it is clearly written and unambiguous.		
7.10				Comment	<p>Draft Policy SS5 Building Design Principles and Protecting Heritage</p> <p>Policy SS5 details 11 design criteria that all new development proposals will expect to adhere to. Whilst Gladman recognise the importance of high-quality design, planning policies should not be overly prescriptive and need flexibility in order for schemes to respond to sites specifics and the character of the local area. There will not be a ‘one size fits all’ solution in relation to design and sites should be considered on a site by site basis with consideration given to various design principles. Gladman therefore suggest that more flexibility is provided in the policy wording to ensure that a high quality and inclusive design is not compromised by aesthetic requirements alone. We consider that to do so could act to impact on the viability of proposed residential developments.</p>	<p>Not accepted.</p> <p>Policy SS5 is not overly prescriptive. The Policy provides useful detail in terms of setting out how developers might achieve higher quality design in development and is supported by Herefordshire Council, the Duchy of Cornwall (a major landowner and developer n the area) and Historic England.</p>	No change.

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7.11			SS7	Comment / Objection	<p>Draft Policy SS7 Settlement Boundaries</p> <p>Policy SS7 states that development will be supported on sites that fall within the identified settlement boundaries of Stretton Sugwas and Swainshill.</p> <p>The use of a settlement boundary to preclude otherwise sustainable development from coming forward does not accord with the positive approach to growth required by the previous Framework and is contrary to basic condition (a). To ensure greater flexibility and to give the SSNP a degree of contingency, Gladman suggest that wording should be added to the policy to state that development adjacent to the settlement boundary will also be considered. Gladman would also like to remind the Parish Council that by failing to support development adjacent to the settlement boundary, policy SS7 is also in direct conflict with HCS Policy RA2 which states sustainable housing growth will be supported in or adjacent to identified settlements.</p>	<p>Not accepted.</p> <p>Settlement boundaries have been identified for the 2 settlements in the NDP area identified in the Core Strategy as "the main focus of proportionate housing development". This was in response to Herefordshire Council's advice and helps to provide certainty in terms of applying the relevant policies RA2 or RA3 in the determination of planning applications.</p>	No change.

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7.12				Comment	<p>Draft Policy SS8 Criteria for New Housing Sites</p> <p>Gladman raise issue with criterion (3) of policy SS8 which proposes a cap on the size of new developments at 11 dwellings.</p> <p>Whilst we acknowledge that this cap meets the affordable housing threshold as required by the HCS, Gladman consider as currently drafted criterion (3) is overly restrictive and provides no flexibility for a prospective developer/house builder. This restriction and lack of flexibility would likely impact on the viability of potential developments. Gladman suggest amending criterion (c) to read as follows; <i>“Development should be of a modest scale and commensurate to the size of the settlement”</i></p>	<p>Partially accepted.</p> <p>Herefordshire Council also raised concerns that the upper limit of 11 units could constrain the provision of affordable housing as part of development schemes.</p> <p>It is proposed to increase the upper limit to 12 units - see 1.1 above, and the suggested additional wording provided by Gladman could also be included to improve the policy further.</p>	<p>Amend NDP.</p> <p>Amend Policy SS8 third paragraph to:</p> <p><u>“Housing development in Stretton Sugwas and Swainshill should be limited schemes of up to 12 units in any one proposal in order to maintain the local character of small and fragmented groups of houses and smallholdings. Overall development schemes should be of a modest scale and commensurate to the size of the existing settlement.”</u></p>
7.13				Comments	<p>.Conclusions</p> <p>Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this</p>	Noted.	No change.

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					<p>consultation response, Gladman has sought to clarify the relation of the SSNP as currently proposed with the requirements of national planning policy and the strategic policies for the wider area.</p> <p>Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.</p> <p>Yours faithfully,</p>		

Appendix I

Informal Consultation on Emerging Draft Plan

Leaflet / Flyer informal consultation on emerging plan 2015 - published in Parish magazine and on website



STRETTON SUGWAS
DRAFT NEIGHBOURHOOD
PLAN

February 2015

Public Consultation and Information Event

Saturday, 7th March 2015

Drop in: 10 a.m. — 2 p.m.

Sunday, 8th March 2015

Drop in: 10 a.m. — 1 p.m.

in Stretton Sugwas Village Hall

For all Stretton Sugwas/Swainshill residents. Come along and give your views on the Draft Neighbourhood Plan and help to decide how you wish to see the parish evolve over the next few years.

The full Draft Neighbourhood Plan document can be seen on the parish website: www.strettonsugwasparishcouncil.co.uk If you require a hard copy prior to the Drop-in Event, please contact: Gail - 01432 340220



STRETTON SUGWAS
DRAFT NEIGHBOURHOOD
PLAN

February 2015

Public Consultation and Information Event

Saturday, 7th March 2015

Drop in: 10 a.m. — 2 p.m.

Sunday, 8th March 2015

Drop in: 10 a.m. — 1 p.m.

in Stretton Sugwas Village Hall

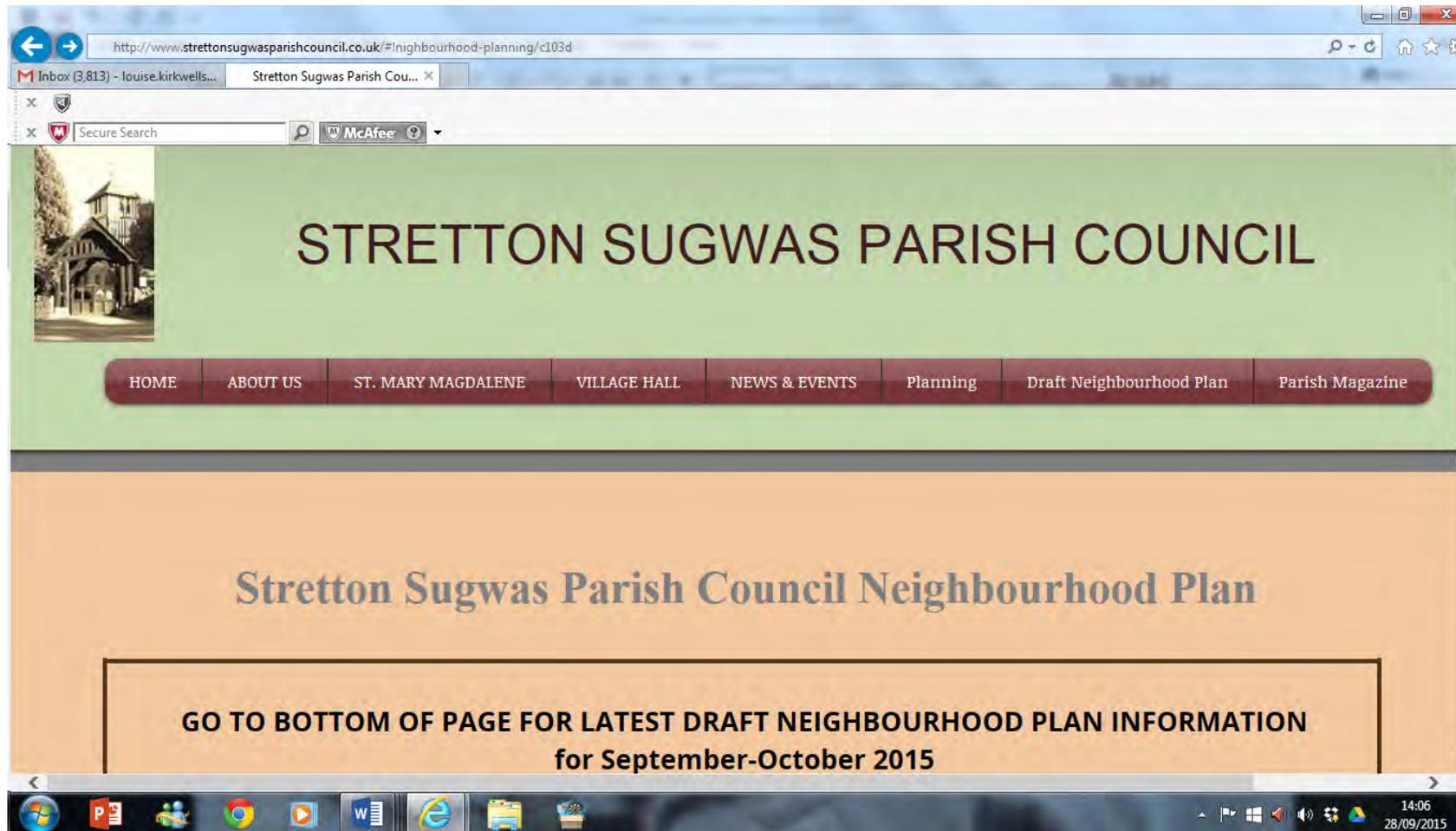
For all Stretton Sugwas/Swainshill residents. Come along and give your views on the Draft Neighbourhood Plan and help to decide how you wish to see the parish evolve over the next few years.

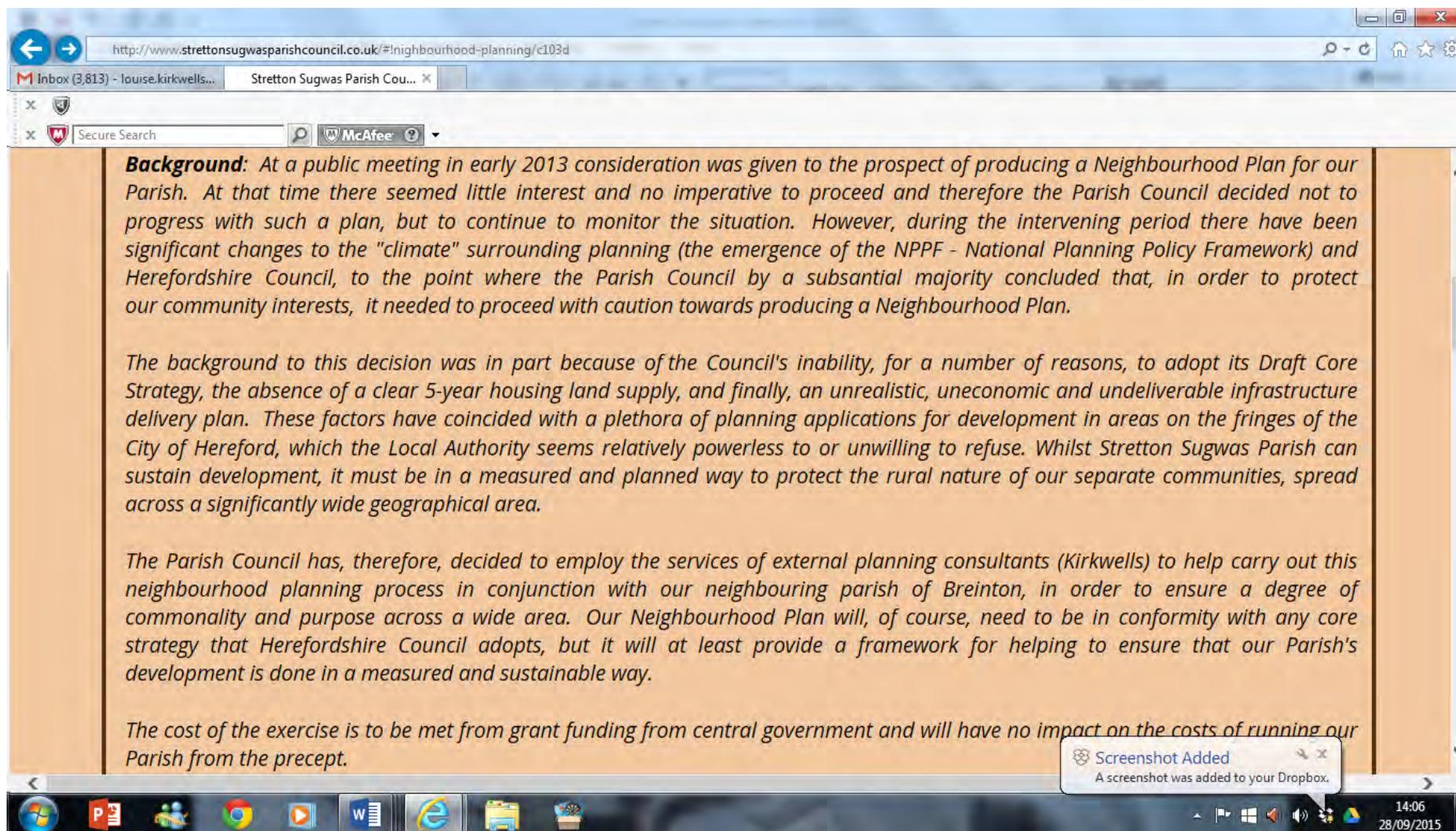
The full Draft Neighbourhood Plan document can be seen on the parish website: www.strettonsugwasparishcouncil.co.uk If you require a hard copy prior to the Drop-in Event, please contact: Gail - 01432 340220

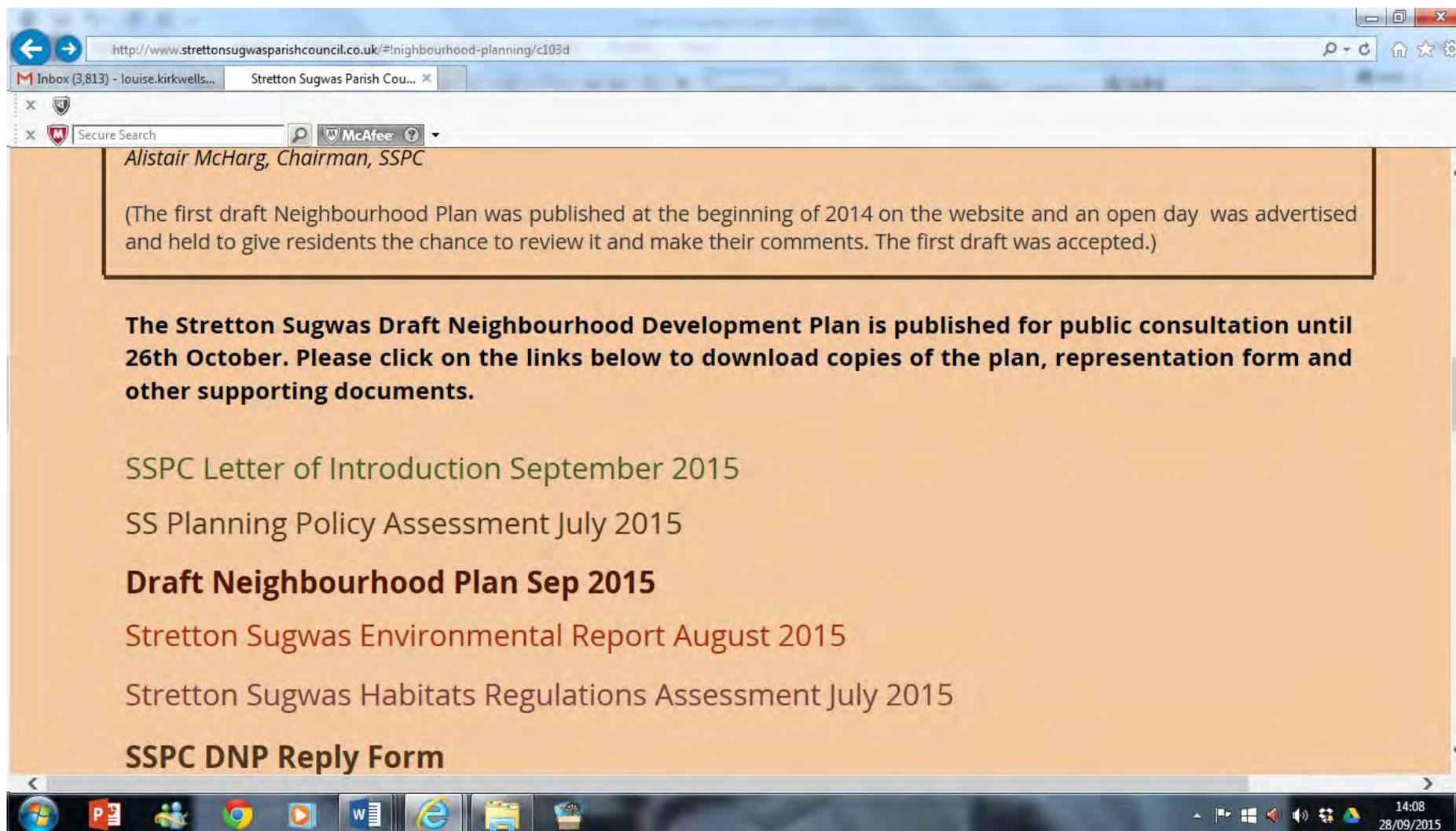
Appendix II

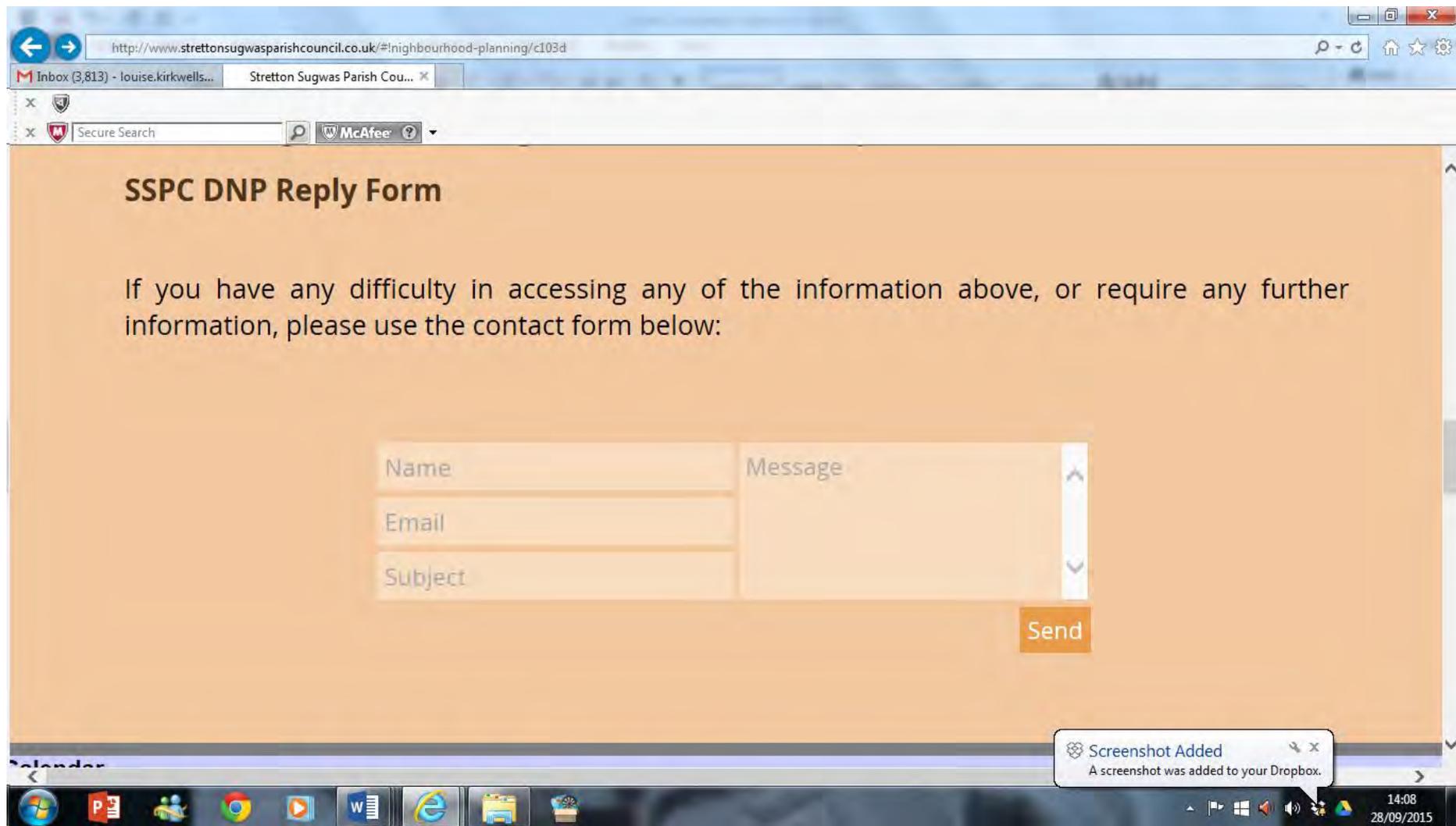
First Regulation 14 Public Consultation

Screenshots









Copy of Letter / Email

STRETTON SUGWAS PARISH COUNCIL

Dear Consultee

Notification of Formal Public Consultation on the Stretton Sugwas Draft Neighbourhood Development Plan (Regulation 14 Town and Country Planning, England Neighbourhood Planning (General) Regulations 2012) from Monday 14th September to 5pm Monday 26th October 2015.

I am writing to advise you that the Stretton Sugwas Draft Neighbourhood Development Plan has been published for consultation by Stretton Sugwas Parish Council.

The Draft Neighbourhood Development Plan has been prepared by a neighbourhood planning group of local parish councillors and interested residents on behalf of the Parish Council, following informal public consultation on the emerging Draft Plan in Autumn 2014.

The consultation period runs for 6 weeks from Monday 14th September to 5pm Monday 26th October 2015.

The Draft Neighbourhood Plan and other supporting documents can be viewed and downloaded from the Parish Council's website:

<http://www.strettonsugwasparishcouncil.co.uk/>

Hard copies are available on request from the Parish Clerk shirley@melconltd.co.uk and are available for viewing at St Magdalen Church and village hall when open.

A Representation Form is provided for comments, but the Parish Council also welcomes comments by email or in writing.

Please submit all comments on the Draft Neighbourhood Development Plan to shirley@melconltd.co.uk or by post to: Shirley Williams, Kemeys, Swainshill, Hereford HR4 7PU **by 5pm 26th October 2015.**

Following the public consultation process on the Draft Neighbourhood Development Plan, the Plan will be amended and submitted to Herefordshire Council together with supporting documentation, including a Basic Conditions Statement and Consultation Statement setting out who has been consulted, how the consultation has been undertaken and how the representations received have informed the Plan.

Herefordshire Council will then re-consult, before the Plan is subjected to an Examination by an Independent Examiner. Once any further amendments have been made the Plan will be subjected to a local Referendum, and then Made by Herefordshire Council and used to determine planning applications in Stretton Sugwas Parish.

If you require any further information please contact the Parish Clerk at the address provided above.

Yours Sincerely

Shirley Williams – Clerk to the Parish Council

Copy of Flyer - Delivered to local households and on Parish notice boards

Stretton Sugwas Draft Neighbourhood Development Plan —September 2015 | Stretton Sugwas Parish Council

STRETTON SUGWAS DRAFT NEIGHBOURHOOD DEVELOPMENT PLAN

REGULATION 14 PUBLIC CONSULTATION

14th SEPTEMBER to 26th OCTOBER 2015

Your comments are invited on this Draft Neighbourhood Development Plan for Stretton Sugwas Neighbourhood Area until 5pm 26th October 2015.

The Draft Neighbourhood Plan and other supporting documents can be viewed and downloaded from the Parish Council's website:

<http://www.strettonsugwasparishcouncil.co.uk/>

Hard copies are available on request from the Parish Clerk shirley@melconltd.co.uk and are available for viewing at St Magdalen Church and village hall when open.

Please submit any comments in writing or by email, preferably using the Response Form which can be downloaded from the Parish Council's website, or can be provided on request from the Parish Clerk.

Please return all comments to the Parish Clerk by email to: shirley@melconltd.co.uk or by post to: Shirley Williams, Kemeys, Swainshill, Hereford HR4 7PU by 5pm 26th October 2015.

Copy of Response Form

**Stretton Sugwas Draft Neighbourhood Development Plan
Regulation 14 Public Consultation From 14th Sept to 26th October 2015**

Representation Form

PLEASE COMPLETE AND RETURN ONE FORM FOR EVERY COMMENT MADE

Office Use Only Consultee No. Representation No.
--

Name	
Organisation	
Address	
Email	
Tel. No.	

Please state to which part of the Draft Neighbourhood Plan your representation refers.
(Please tick ✓)

Page Number	
Paragraph Number	
Policy Number	

Are you supporting, objecting, or making a comment? (Please Tick ✓)

Support	
Object	
Making a Comment	

Please Turn Over

Please use the box below for any comments.

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Thank you for your time and interest. Please return this form and any other comments to the Parish Clerk by email to: shirley@melconltd.co.uk or by post to: Shirley Williams, Kemeys, Swainshill, Hereford HR4 7PU **by 5pm 26th October 2015.**

List of Consultation Bodies and Other Consultees contacted by email / letter

Duchy of Cornwall

Wyevale Trees

TJ Crump Oakwrights, Swainshill

Sugwas Farm, Swainshill (Mr Morgan Jones)

Stretton Sugwas Academy (Parents & Governore)

St Mary Magdalene Church Congregations

Stretton Sugwas Village Hall and all users

All residents of Stretton Sugwas and Swainshill through the parish magazine and the website

Stretton Nursing ome

Herefordshire Council NP Department

Herefordshire Council Planning Department

The Coal Authority

Homes and communities agency

Natural England

The Environment Agency

Natural Resources Wales

Historic England

English Heritage

National Trust

Network Rail West

Highways England

Wye Valley NHS Trust

Amec environment and Infrastructure UK

Npower Renewables Ltd

Welsh Water Authority

Severn Trent Water

Campaign to Protect Rural England

Woodland Trust

Hereford Civic Trust

Herefordshire Nature Trust

Parish Council Newsletter – October 2015

STRETTON SUGWAS NEWS



OCTOBER, 2015

STRETTON SUGWAS PARISH COUNCIL

Dear Consultee

Notification of Formal Public Consultation on the Stretton Sugwas Draft Neighbourhood Development Plan (Regulation 14 Town and Country Planning, England Neighbourhood Planning (General) Regulations 2012) from Monday, 14th September to 5pm Monday, 26th October, 2015.

I am writing to advise you that the Stretton Sugwas Draft Neighbourhood Development Plan has been published for consultation by Stretton Sugwas Parish Council.

The Draft Neighbourhood Development Plan has been prepared by a neighbourhood planning group of local parish councillors and interested residents on behalf of the Parish Council, following informal public consultation on the emerging Draft Plan in Autumn 2014.

The consultation period runs for 6 weeks from Monday, 14th September to 5pm Monday, 26th October, 2015.

The Draft Neighbourhood Plan and other supporting documents can be viewed and downloaded from the Parish Council's website:

<http://www.strettonsugwasparishcouncil.co.uk/>

Hard copies are available on request from the Parish Clerk: shirley@melconltd.co.uk and are available for viewing at St. Magdalene Church and village hall when open.

A Representation Form is provided for comments, but the Parish Council also welcomes comments by email or in writing.

Please submit all comments on the Draft Neighbourhood Plan to shirley@melconltd.co.uk or by post to: Shirley Williams, Kemeys, Swainshill, Hereford, HR4 7PU by **5pm 26th October, 2015.**

Following the public consultation process on the Draft Neighbourhood Development Plan, the Plan will be amended and submitted to Herefordshire Council together with supporting documentation, including a Basic Conditions Statement and Consultation Statement setting out who has been consulted, how the consultation has been undertaken and how the representations received have informed the Plan.

Herefordshire Council will then re-consult, before the Plan is subjected to an Examination by an Independent Examiner. Once any further amendments have been made the Plan will be subjected to a local Referendum, and then Made by Herefordshire Council and used to determine planning applications in Stretton Sugwas Parish.

If you require any further information please contact the Parish Clerk at the address provided above.

Yours sincerely,

Shirley Williams - Clerk to the Parish Council

Appendix III
Settlement Boundary Informal Consultation 2018

Copy of Flyer

STRETTON SUGWAS NEIGHBOURHOOD DEVELOPMENT PLAN (REVISION)

PUBLIC CONSULTATION (INFORMAL)

JUNE 2018

Your comments are invited on this revised Neighbourhood Development Plan for Stretton Sugwas Neighbourhood Area until the end of June 2018.

The Plan as well as proposed options for settlement boundaries at Swainshill and Stretton Sugwas may be viewed at drop-in events at the Village hall on Friday June 15th from 6pm to 9pm and Saturday June 16th from 9am to 12am. (Settlement boundaries not on-line)

The revised Neighbourhood Plan can be viewed and downloaded from the Parish Council's website:

<http://www.strettonsugwasparishcouncil.co.uk>

Hard copies are available for viewing at the church and village hall when open,

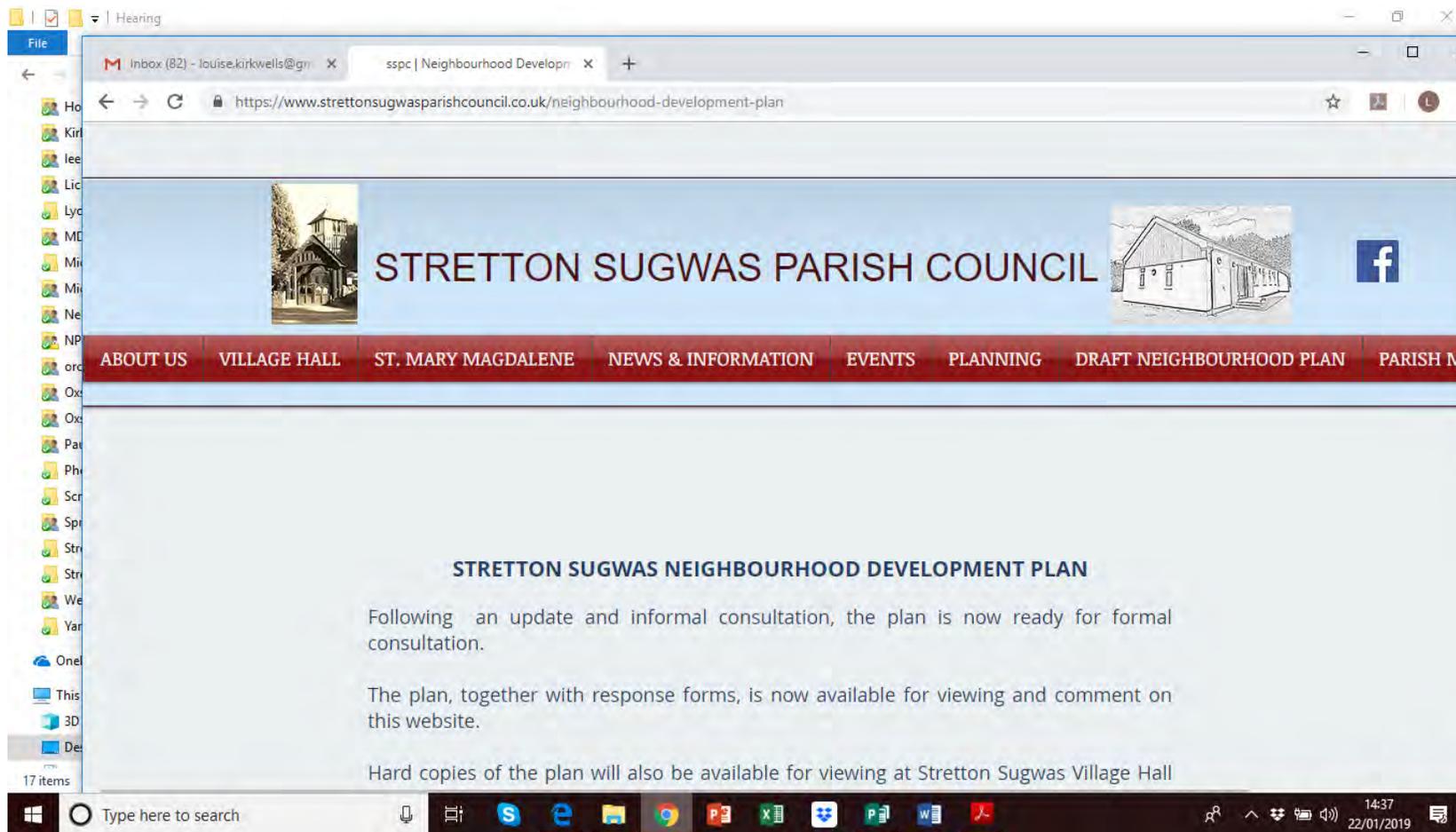
Please submit any comments in writing or by e-mail, preferably using the Response Form which can be downloaded from the Parish Council website,

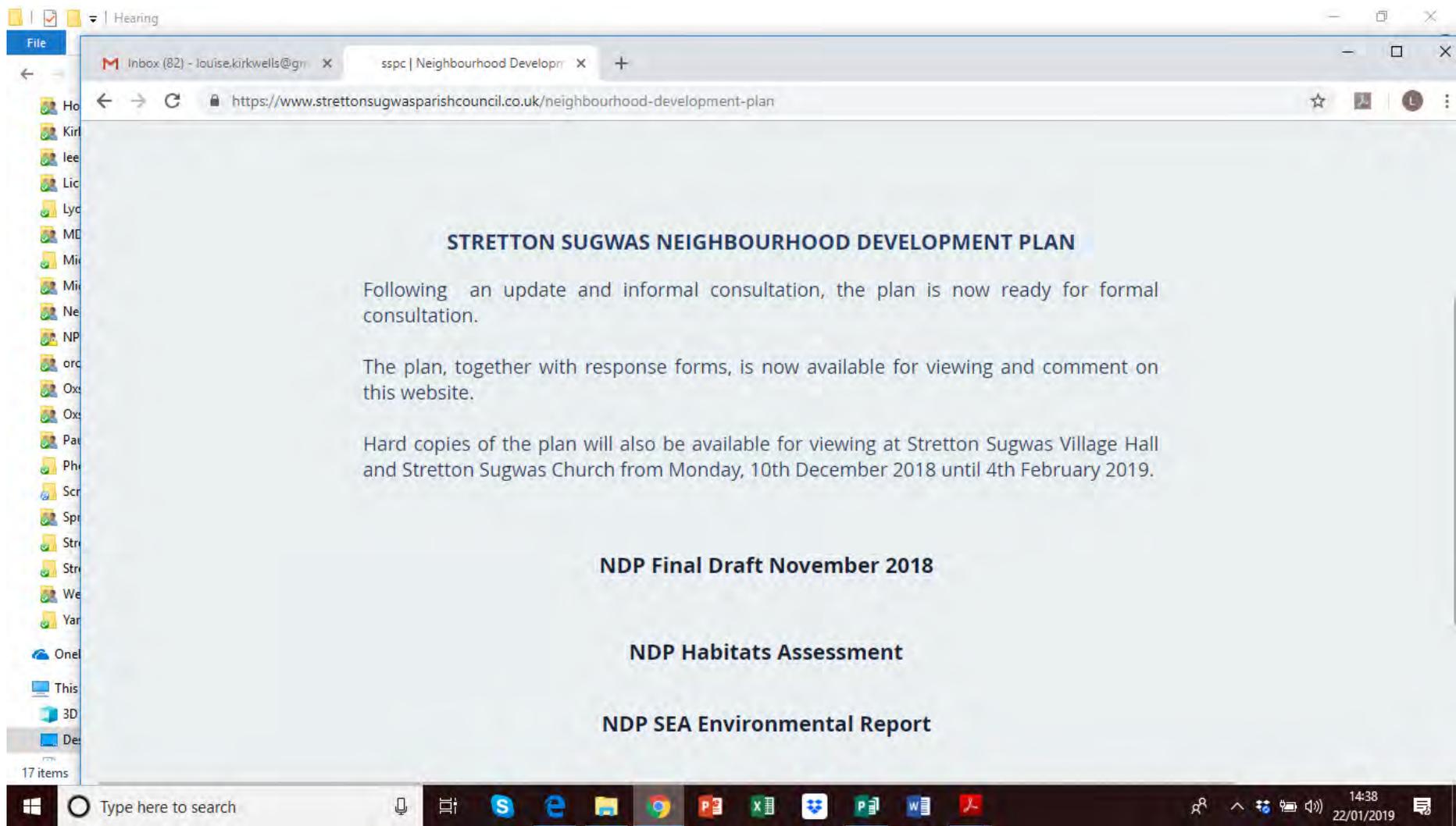
Please return all comments to the Parish Clerk by e-mail to shirley.kemevs@btinternet.com

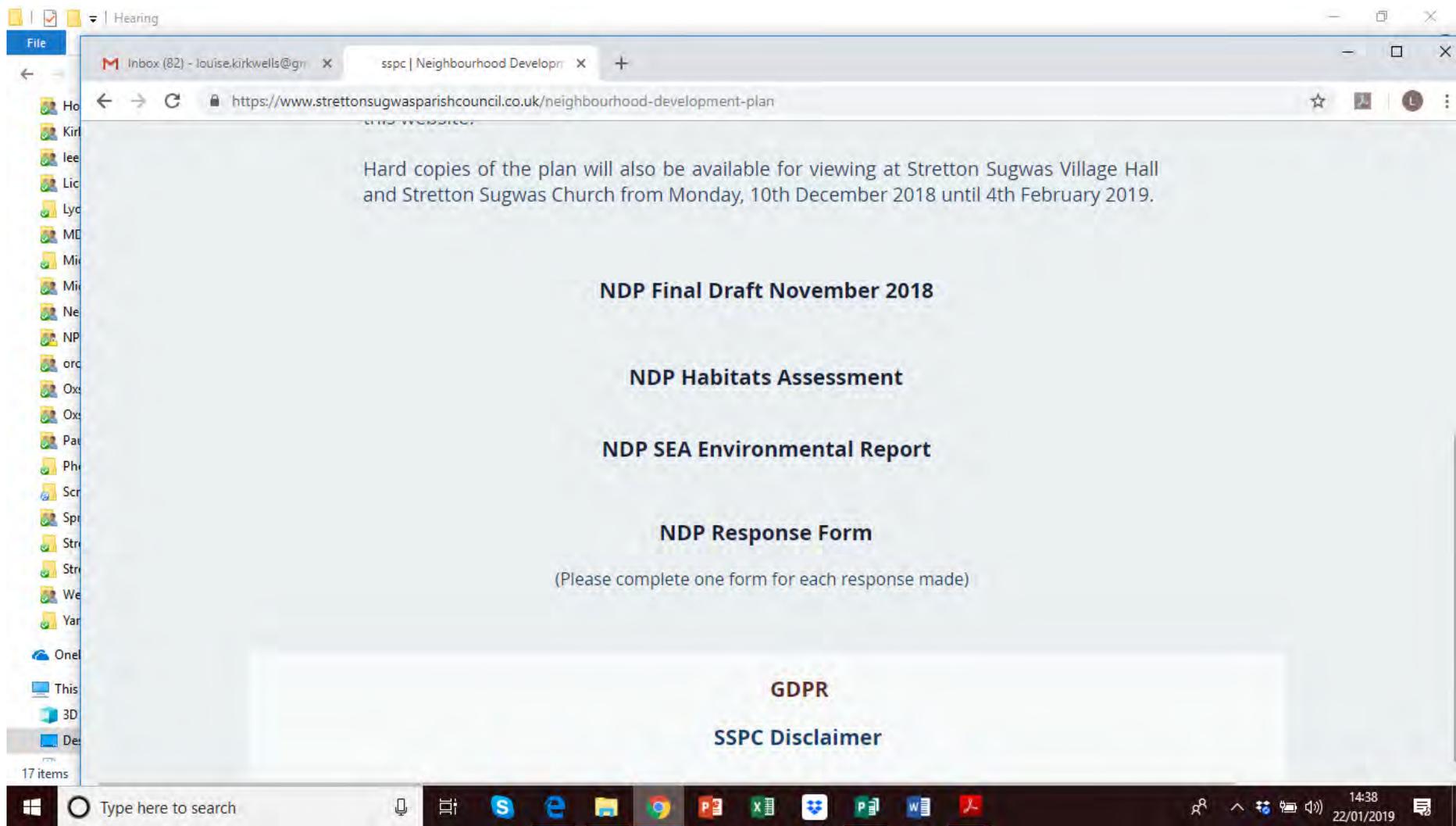
Or by post to: Shirley Williams, Kemeys, Swainshill, Hereford, HR4 7PU by 5pm June 30th 2018.

Appendix IV Regulation 14 Consultation Process

Screenshots







Copy of Flyer delivered to local households

STRETTON SUGWAS NEIGHBOURHOOD DEVELOPMENT PLAN

Following an update and informal consultation, the plan is now ready for formal consultation.

The plan together with response forms will be available for viewing and comment on the Stretton Sugwas website:-

www.strettonsugwasparishcouncil.co.uk

Hard copies of the plan will also be available for viewing at Stretton Sugwas Village Hall and Stretton Sugwas Church

The plan will be available for viewing and comment from December 10th till February 4th.

Copy of formal letter / email to consultation bodies

STRETTON SUGWAS PARISH COUNCIL

Dear Consultee

Notification of Formal Public Consultation on the Stretton Sugwas Draft Neighbourhood Development Plan (Regulation 14 Town and Country Planning, England, Neighbourhood Planning (General) Regulations 2012)

I am writing to advise you that the Stretton Sugwas Draft Neighbourhood Development Plan (NDP) has been published for consultation by Stretton Sugwas Parish Council.

The Draft Neighbourhood Development Plan has been prepared by a neighbourhood planning steering group of local parish councillors and interested residents on behalf of the Parish Council, building on extensive informal public consultation and engagement since 2014, and an earlier Regulation 14 public consultation in 2015.

The consultation period runs for 8 weeks from Dec 10th 2018 until Feb 4th 2019.

The Draft Plan and other supporting documents can be viewed and downloaded from the Neighbourhood Plan website: www.strettonsugwasparishcouncil.co.uk

Hard copies of all Neighbourhood Plan can be viewed in the following locations at normal opening times:
Stretton Sugwas Village Hall
Stretton Sugwas Church

A Representation Form is provided for comments, but the Parish Council also welcomes comments by email or in writing.

Please submit all comments on the Draft Neighbourhood Development Plan to:

Mrs S Williams, Kemeys, Swainshill, Hereford, HR4 7PU

shirley.kemeys@btinternet.com

By February 4th 2019

Following the public consultation process on the Draft Neighbourhood Development Plan, the Plan will be amended and submitted to Herefordshire Council together with supporting documentation, including a Basic Conditions Statement and Consultation Statement setting out who has been consulted, how the consultation has been undertaken and how the representations received have informed the Plan.

Herefordshire Council will then re-consult, before the Plan is subjected to an Examination by an Independent Examiner. Once any further amendments have been made the Plan will be subjected to a local Referendum, and then Made by Herefordshire Council and used to help determine planning applications in the two parishes.

If you require any further information, please contact the Parish Clerk at the address provided above.

Yours Sincerely

Shirley Williams

Shirley Williams

List of consultation bodies and other organisations contacted

Appendix 1

Relevant key stakeholders that may need to be consulted include:

The Coal Authority: Should be consulted to make sure any plans you have would not effect or be effected by existing or previous coal mining activity in Herefordshire. **Contact details:** planningconsultation@coal.gov.uk

Homes and Communities Agency: The Government's housing, land and regeneration agency and regulator of social housing providers in England. They are interested in increasing the numbers of new and affordable homes being built and or made available, and the amount of land being made available for development. **Contact details:** mail@homesandcommunities.co.uk

Natural England: The Government's adviser on the natural environment, providing practical scientific advice on how to look after England's landscapes and wildlife. They will have a view on all Neighbourhood Development Plans. **Contact details:** consultations@naturalengland.org.uk

The Environment Agency: Established to protect and improve the environment and have a statutory duty to support sustainable development. They are responsible for regulating industry and waste, treating contaminated land, water quality and resources, fisheries, inland river navigation and conservation and ecology. Consequently they will have a view on all Neighbourhood Development Plans. **Contact details:** graeme.irwin@environment-agency.gov.uk and SHWGPPlanning@environment-agency.gov.uk

Natural Resources Wales: Performing a similar role in Wales that Natural England does over the border. Will need to be consulted if your Neighbourhood Area adjoins the Welsh border. **Contact details:** enquiries@naturalresourceswales.gov.uk

Historic England: The public body that looks after England's historic environment. They are responsible for listing buildings and monuments and provide advice to Government and Local Authorities. They will have a view on all Neighbourhood Development Plans that contain listed buildings or Scheduled Ancient Monuments. **Contact details:** west.midlands@HistoricEngland.org.uk

English Heritage: A charity that is responsible for looking after over 400 historic buildings, monuments and sites. They should be consulted if your Neighbourhood Area has one of their properties within it. **Contact Details:** customers@english-heritage.org.uk

National Trust: A charity that preserves and protects historic places and spaces across the UK. These include archaeological remains, buildings, gardens, and natural habitats such as woodlands and meadows. **Contact details:** mi.customerenquiries@nationaltrust.org.uk

Arriva Trains Wales: Responsible for running trains through the county on the line between Ludlow and Abergavenny. Should be consulted if your area includes, or is adjacent to any part of this route or if your plan has an interest in transport connections that include this line. **Contact details:** michael.vaughan@arrivatw.co.uk

Great Western Trains Co. Limited: Responsible for running trains through the County on the line between Worcester and Hereford. Should be consulted if your area includes, or is adjacent to any part of this route or if your plan has an interest in transport connections that include this line. **Contact details:** <https://www.firstgreatwestern.co.uk/About-Us/Contact-us>

Network Rail (West): The company that owns and manages the rail infrastructure throughout the County that the two train operators run their trains on. Their interests include the railway itself and the land on which it is built, the stations and network buildings and structures (signal boxes, foot-bridges etc), and include bridges, level crossings, and current redundant lines or railway land. Should be consulted if your area includes, or is adjacent to any part of this route or if your plan has an interest in transport connections that include this line. **Contact details:** barbara.morgan@networkrail.co.uk

Highways England: They operate, maintain and improve the strategic road network in England. They are an executive agency funded by the Department for Transport. In Herefordshire their responsibility therefore applies to the A49, A40 and the M50. However they will have a view on all Neighbourhood Development Plans irrespective of whether your area includes these major roads. **Contact details:** info@highwaysengland.co.uk

Wye Valley NHS Trust: A provider of health services in Herefordshire. They provide community services and hospital care (acute and community) across the County as well as urgent and elective care to more than 40,000 people in mid-Powys. **Contact details:** john.burnett@wvt.nhs.uk

AMEC Environment and Infrastructure UK Ltd: Private company providing environmental, engineering and related consultancy services to the public sector, including in Herefordshire. **Contact details:** <http://www.amec-ukenvironment.com/index.html>

RWE Npower Renewables Limited: A private company dealing with the generation, supply and distribution of electricity and gas to the Herefordshire population. **Contact details:** jeremy.smith@rwe.com

Dwr Cymru Welsh Water: Provide all the water supply infrastructure across large parts of the County, from collection, storing, purifying, distribution through the mains network, and disposal through the sewerage system. Dwr Cymru Welsh Water will have a view on all Neighbourhood Development Plans so will need to be one of your statutory consultees. **Contact details:** forward.plans@dwrcymru.com

Severn Trent Water: Provide all the water supply infrastructure across large parts of the County, from collection, storing, purifying, distribution through the mains network, and disposal through the sewerage system. Severn Trent Water will have a view on all Neighbourhood Development Plans so will need to be one of your statutory consultees. **Contact details:** growth.development@severntrent.co.uk

Campaign to Protect Rural England: Campaign organisation lobbying on behalf of "a beautiful and living countryside". Would be interested to be consulted on your Neighbourhood Development Plan. **Contact details:** <http://www.cpreherefordshire.org.uk/contact-us.aspx>

Hereford and Worcester Chamber of Commerce: A not for profit organisation that supports the local business community and has a network of 1400 member businesses. They lobby to make sure the interests of local businesses are heard. **contact details:** goodbusiness@hwchamber.co.uk

Woodland Trust: A national charity that works to influence others who are in a position to improve the future of native woodlands. They own over 1000 woods across the UK. Would be particularly interested to be consulted on any matters related to these sites or woodlands as a whole within your Neighbourhood Development Plan. **Contact details:** justinmliward@woodland-trust.org.uk

Hereford Civic Society: Is an independent charity that promotes high standards of architecture and town planning in the city; stimulates public interest and debate in the subject; and encourages the preservation and improvement of features that are of public amenity or historic interest. Would only be interested in being a consultee if your Neighbourhood Area is within Hereford City or the surrounding area. **Contact details:** herefordcivicsociety@hotmail.co.uk

Herefordshire Nature Trust: The largest membership-based wildlife organisation in the County. It is dedicated to inspiring people about wildlife, being a champion on its behalf and creating or protecting wildlife havens. **Contact details:** enquiries@herefordshirewt.co.uk

Ledbury and District Civic Trust: See details for Hereford Civic Society. Would only be interested in being a consultee if your Neighbourhood Area is within Ledbury or the surrounding area. **Contact details:** chairman@ledburycivicsociety.org

Ross-on-Wye and District Civic Trust: See details for Hereford Civic Society. Would only be interested in being a consultee if your Neighbourhood Area is within Ross-on-Wye or the surrounding area. **Contact details:** secretary@rosscivic.org.uk

Leominster Civic Trust: See details for Hereford Civic Society. Would only be interested in being a consultee if your Neighbourhood Area is within Leominster or the surrounding area. **Contact details:** c/o Leominster Community Centre, Leominster, HR6 9HA

Madley Communications Centre: A British Telecom Earth satellite tracking station which is used for international telephone, fax and television transmission and reception. **Contact details:** Madley Earth Satellite Station, Madley, Herefordshire, HR2 9NH

STRETTON SUGWAS NDP REGULATION 14 CONSULTEES DECEMBER 2018

Highways Agency
Environment Agency
Coal Authority
Network Rail
Natural England
Welsh Water
Historic England
Herefordshire Council
Bishopstone PC
Burghill PC
Credenhill PC
Breinton PC
The Duchy of Cornwall
Wyevale Trees
KTH
Oakwrights
Stretton Nursing Home
Morgan Jones & Son
Stephen Price
Councillor Bob Matthews

Copy of Representation Form (Online version from Website)

STRETTON SUGWAS NEIGHBOURHOOD PLAN			
RESPONSE FORM			
NAME			
ADDRESS			
e-MAIL			
PHONE			
Please tick boxes to support /object to or comment on the following draft Policies			
SS1	Protecting sensitive landscapes	Support <input type="checkbox"/>	Object <input type="checkbox"/>
	Comment		
SS2	Landscape design principles	Support <input type="checkbox"/>	Object <input type="checkbox"/>
	Comment		
SS3	Green infrastructure	Support <input type="checkbox"/>	Object <input type="checkbox"/>
	Comment		
SS4	Managing flood risk	Support <input type="checkbox"/>	Object <input type="checkbox"/>
	Comment		
SS5	Building Design principles and protecting heritage	Support <input type="checkbox"/>	Object <input type="checkbox"/>
	Comment		
SS6	Managing new business development in former agricultural buildings	Support <input type="checkbox"/>	Object <input type="checkbox"/>
	Comment		
SS7	Settlement boundaries	Support <input type="checkbox"/>	Object <input type="checkbox"/>
	Comment		
SS8	Criteria for new housing sites	Support <input type="checkbox"/>	Object <input type="checkbox"/>
	Comment		
SS9	Housing in the countryside	Support <input type="checkbox"/>	Object <input type="checkbox"/>
	Comment		
SS10	New roads	Support <input type="checkbox"/>	Object <input type="checkbox"/>
	Comment		
Any general comment			
NB Your data will be only be used for responding to your comments and then deleted It will be used for no other purpose			

Copy of Response Form - Word Version

Stretton Sugwas Draft Neighbourhood Development Plan (NDP)

Public Consultation from Dec10th 2018 to Feb 4th 2019

Representation Form

PLEASE COMPLETE AND RETURN ONE FORM FOR EVERY COMMENT MADE

Office Use Only Consultee No. Representation No.

Name	
Organisation	
Address	
Email	
Tel. No.	

To which part of the Stretton Sugwas Draft Neighbourhood Development Plan does your representation refer?

Page Number	
Paragraph Number	
Policy Number	

Are you supporting, objecting, or making a comment? (Please Tick v)

Support	<input type="checkbox"/>
Object	<input type="checkbox"/>
Making a Comment	<input type="checkbox"/>

Please use the box below and overleaf for any comments. PTO



Thank you for your time and interest.

Please return this form by 5pm February 4th 2019 to:

Mrs S Williams

Kemeys

Swainshill

Hereford

HR4 7PU

shirley.kemeys@btinternet.com

