

Latham, James

From: Turner, Andrew
Sent: 18 July 2019 11:08
To: Neighbourhood Planning Team
Subject: RE: Longtown Group Regulation 16 submission neighbourhood development plan consultation

RE: Longtown Group Regulation 16 Neighbourhood Development Plan

Dear Neighbourhood Planning Team,

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

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

Having reviewed records readily available, I would advise the following:

Policies LGPC2 and LGPC3:

Regarding the proposed housing sites polices 'LGPC2'(Land South East of Greyhound Close) and' LGPC3' (Land North of Penbailey) indicated in brown on the 'Longtown village Policies Map':

- A review of Ordnance survey historical plans indicate the proposed sites appear to have had no previous historic potentially contaminative uses.

Policy LGPC 4: Residential Use Associated with Historic Farmsteads

- Some farm buildings may be used for the storage of potentially contaminative substances (oils, herbicides, pesticides) or for the maintenance and repair of vehicles and machinery. As such it is possible that unforeseen contamination may be present on the site. Consideration should be given to the possibility of encountering contamination on the site as a result of its former uses and specialist advice be sought should any be encountered during the development.
- Regarding sites with a historic agricultural use, I would mention that agricultural practices such as uncontrolled burial of wastes or excessive pesticide or herbicide application may be thought of as potentially contaminative and any development should consider this.

Please note it would make it easier to reference and identify sites in the next NDP if the proposed housing sites are labelled on the plans.

General comments:

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

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

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

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

Kind regards

Andrew

Herefordshire.gov.uk

Andrew Turner
Technical Officer (Air, Land & Water Protection)
Economy and Place Directorate,
Herefordshire Council
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Hereford.
HR1 2PJ

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From: Neighbourhood Planning Team <neighbourhoodplanning@herefordshire.gov.uk>
Sent: 13 June 2019 10:37
Subject: Longtown Group Regulation 16 submission neighbourhood development plan consultation

Dear Consultee,

Longtown Group Parish Council have submitted their Regulation 16 Neighbourhood Development Plan (NDP) to Herefordshire Council for consultation.

The plan can be viewed at the following link:
https://www.herefordshire.gov.uk/directory_record/3081/longtown_group_neighbourhood_development_plan

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

Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment

From Herefordshire Council Strategic Planning Team

Name of NDP REG 16: Longtown Group NDP

Date: 01/08/19

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
LGPC1 Housing within Longtown village	RA2; LD1; SD1; MT1; E1; E3; LD3	Y	
LGPC2 Land south east of Greyhound Close	RA2; LD3; SS6; LD1; H3	Y	
LGPC3 Land north of Penbailey	SC1; OS1; MT1	Y	
LGPC4 Residential use associated with historic farmsteads	SS1; RA3; RA4; RA5; H2	Y	
LGPC 5 Providing for local housing need	N/A	Y	LGPC 5 has echoes of Policy H1 (Affordable housing) but is largely a housing allocation policy, which is not in the CS ; never the less it does not conflict with the CS .
LGPC 6 Supporting local enterprise	E3; RA4; MT1; SS1;	Y	
LGPC 7 Broadband and mobile telephone infrastructure	SS5; E1	Y	
LGPC8 Highway design requirements	SS4; MT1	Y	
LGPC9 Protection and development of public rights of way	OS1	Y	

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
LGPC10 Protection and enhancement of community facilities and services	OS3; OS2; SC1	Y	
Policy LGPC 11: Contributions to Community Services, Youth Provision and Recreational Facilities	OS2	Y	
Policy LGPC 12: Protecting and Enhancing the Landscape and its Features	SS1; LD1; LD2; SS6; LD3; OS3; LD4	Y	
LGPC13 Protecting heritage assets	SS6; LD4	Y	
LGPC14 Foul and storm water drainage	SD3	Y	
LGPC15 Proposals for renewable energy	SD1; SD2	Y	

Other comments/conformity issues:

Latham, James

From: Donotreply
Sent: 07 August 2019 16:50
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Charles
Last name	O'Neill
Which plan are you commenting on?	Longtown
Your comments	<p>Firstly, the proposed number of possible addition dwellings is un sustainable for a village like Longtown. Access to and from is very narrow and limited, in addition to its very poor state of road surface. At times is downright dangerous with high risk of collision. (V narrow lanes, blind corners etc) No only would additional dwellings increase local people traffic, but associated increases in service vehicles, deliveries, trades etc. Longtowns very important status as a historical site (especially with the recent discovery of Roman origins) would be adversely affected, and all this in full view from Offas Dyke. Specifically, the proposals for the field to SE of Greyhound Close. There is very limited access, the entrance to the close is narrow and there is insufficient room for 2 cars to pass, meaning one is partially blocking the road through the village when this happens. Because of dwellings either side of the entrance, widening is not an option. If additional traffic were coming through there, there could be problems and increased risk of collision. There also a number of young children who play in the close, and so a very big increased risk to their safety! From a nature point of view, the field is a source for a number of local Red Kites, any development would obviously have huge impact on their habitat. It is also used by a number of lesser horseshoe bats, particularly towards the lower end near the sewage plant. Talking of the sewage plant, there are a number concerns about the capacity, and its ability to cope. Overall, Longtown is a</p>

	<p>beautiful, fairly isolated location, some miles for mainstream requirements, especially for families. So lots of additional cars journeys and significant increase in carbon footprint. Additional housing needs siting closer to these mainstream facilities and certainly not where you are forcing them to use their cars more.</p>
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The Coal
Authority



INVESTOR IN PEOPLE



RTPI
Learning Partner

200 Lichfield Lane
Berry Hill
Mansfield
Nottinghamshire
NG18 4RG

Tel: 01623 637 119 (Planning Enquiries)

Email: planningconsultation@coal.gov.uk

Web: www.gov.uk/coalauthority

For the Attention of: Neighbourhood Planning
Herefordshire Council

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

08 August 2019

Dear Neighbourhood Planning

(2) Longtown Group Regulation 16 Submission NDP Consultation

Thank you for consulting The Coal Authority on the above.

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

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

Yours sincerely

Christopher Telford BSc(Hons) DipTP MRTPI
Principal Development Manager

Latham, James

From: Norman Ryan <Ryan.Norman@dwrwymru.com>
Sent: 16 July 2019 14:39
To: Neighbourhood Planning Team
Subject: RE: Longtown Group Regulation 16 submission neighbourhood development plan consultation
Attachments: DCWW consultation response - Longtown NDP - March 2019.pdf

Dear Sir/Madam,

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

As you may be aware, we were consulted as part of the Regulation 14 consultation earlier this year (see attached) and are pleased to note that the Parish Council has considered our comments within the Consultation Report. As such, we have no specific comments to make at the current time.

Should you require any further information, then please do not hesitate to contact me.

Kind regards,



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

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

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

From: Neighbourhood Planning Team [mailto:neighbourhoodplanning@herefordshire.gov.uk]
Sent: 13 June 2019 10:37
Subject: Longtown Group Regulation 16 submission neighbourhood development plan consultation

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

Dear Consultee,

Longtown Group Parish Council have submitted their Regulation 16 Neighbourhood Development Plan (NDP) to Herefordshire Council for consultation.

The plan can be viewed at the following link:

https://www.herefordshire.gov.uk/directory_record/3081/longtown_group_neighbourhood_development_plan

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

The consultation runs from 13 June 2019 to 8 August 2019.

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

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

Longtown Group Parish Council
Neighbourhood Development Plan

Enquiries: Rhys Evans/Ryan Norman
0800 917 2652

FAO Longtown Group Parish Clerk

Sent via email

12th March 2019

Dear Sir/Madam

REGULATION 14 PUBLIC CONSULTATION ON LONGTOWN GROUP PARISH COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN, MARCH 2019

I refer to the above consultation that is currently underway. Welsh Water appreciates the opportunity to comment and we offer the following representation:

Given that the Neighbourhood Development Plan (NDP) has been prepared in accordance with the Adopted Herefordshire Local Plan Core Strategy we are supportive of the aims, objectives and policies set out.

We are particularly pleased with the provisions of Policy LGPC14, which seeks to ensure there is sufficient capacity within the public sewerage network and Wastewater Treatment Works (WwTW) before allowing new developments to connect. As you will be aware, the settlement of Longtown is the only area of the Group Parish that is served by public sewerage, and there should be no issues in the network or WwTW accommodating the foul-only flows from the number of dwellings proposed.

We understand that the indicative housing target for the NDP is 32 dwellings, but that when taking account of completions to date, commitments, site allocations and windfall the NDP will deliver a potential of 68 dwellings over the Plan Period. With particular regard to the two housing allocations, we can advise the following:

LGPC2 – Land south east of Greyhound Close – 8-12 dwellings

Water supply

There are currently isolated water pressure issues across the network in this area, and as such we are undertaking ongoing investigations. If a developer wishes to bring this site forward in advance of our future regulatory investment, they may need to fund the reinforcement works themselves by undertaking a hydraulic modelling assessment and carrying out the required upgrades in order to ensure their site can be accommodated without causing detriment to existing customers' supply.

Sewerage and WwTW

There should be no issues in the public sewerage network or WwTW accommodating the foul-only flows from this development site.

LGPC3 – Land north of Penbailey – 12-16 dwellings

Water supply

There are currently isolated water pressure issues across the network in this area, and as such we are undertaking ongoing investigations. If a developer wishes to bring this site forward in advance of our future regulatory investment, they may need to fund the reinforcement works themselves by undertaking a hydraulic modelling assessment and carrying out the required upgrades in order to ensure their site can be accommodated without causing detriment to existing customers' supply.

Sewerage and WwTW

There should be no issues in the public sewerage network or WwTW accommodating the foul-only flows from this development site.

The site is traversed by a 150mm public foul sewer for which protection measures will be required by way of an easement/protection zone or diversion.

We hope that the above information will assist you as you continue to progress the NDP. In the meantime, should you require any further information please do not hesitate to contact us at Forward.Plans@dwrcymru.com or via telephone on 0800 917 2652.

Yours faithfully,

Ryan Norman
Forward Plans Officer
Developer Services

Our Reference: SHARE/617238
Your Reference: Longtown NP

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

via Email: jlatham@herefordshire.gov.uk

Priya Sansoy
Assistant Asset Manager

The Cube
199 Wharfside Street
Birmingham B1 1RN

Direct Line: 0300 470 8130

19 July 2019

Dear James,

LONGTOWN GROUP PARISH NEIGHBOURHOOD DEVELOPMENT PLAN CONSULTATION

Thank you for forwarding me details of the above Neighbourhood Development Plan (NDP) received on 13th June 2019.

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 operation of the SRN whilst acting as a delivery partner to national economic growth. The strategic road network closest to the site consists of the A49, approximately 10 miles away.

We have reviewed the consultation documents and can confirm that the policies set out within the Neighbourhood Plan are unlikely to have implications for the continued safe operation and functionality of the SRN. This is due to the distance of the area from the SRN and the relatively small number of dwellings to be built over the plan period.

We support the commitments of the Parish to sustainable development principles contained within the Plan but have no further comments to make on its contents.

Please do not hesitate to contact me if you require any more information or clarification.

Yours sincerely,

Priya Sansoy
OD Midlands

Email: Priya.Sansoy@highwaysengland.co.uk



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

Direct Dial: 0121 625 6887

Our ref: PL00021490

7 August 2019

Dear Mr Latham

**LONGTOWN GROUP NEIGHBOURHOOD PLAN - REGULATION 16
CONSULTATION.**

Thank you for the invitation to comment on the Regulation 16 Neighbourhood Plan. As noted in our previous consultation response at the Regulation 14 stage:

“Historic England is generally extremely supportive of both the content of the document and the vision and objectives set out in it.

The emphasis on the conservation of local distinctiveness through good design and the protection of locally significant buildings and landscape character including archaeological remains, farmsteads and important views is to be applauded.

However, in the Regulation 14 response we also registered our significant concern in relation to the allocated housing site “south-east of Greyhound Close” (Site reference No. 3) pointing out that Historic England could not support the allocation of this site in the Neighbourhood Plan for housing development.

As stated previously, in the view of our Assistant Inspector of Ancient Monuments, Alison Macdonald:

“The siting of 8-12 houses on this plot would change the character of this part of the village and therefore the setting of the Scheduled Monument. Although it is acknowledged that the re-development of the adjacent farmyard has already had a negative impact on the character of the village this should not set a precedent. It is acknowledged in the site assessment (pg 32) that “the development of this site would exacerbate the uncharacteristic form of development in this location”. Housing within the core of historic Longtown of which this is part (as acknowledged by the SM parcel on the other side of the road) faces the road and is within the burgage plot divisions. This plot has no street frontage and access would be through the farm development (Greyhound Close). The landscape of this area is also highly sensitive in this location, with views of the village, showing its historic form, from the Brecon Beacons National Park”.

Alison concluded that, with further detailed discussion with both the neighbourhood plan team and the local planning authority, it may be possible for a sensitive design to be arrived at for a small number of houses on this site, but not the numbers suggested and it would very much depend on layout and design.

Unfortunately, no such detailed discussion about the proposed allocation has since



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

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HistoricEngland.org.uk





taken place and the current Regulation 16 iteration of the Plan still contains the allocation (Policy LGPC2: Land South East of Greyhound Close) with the same suggested quantum of development.

The issues raised in our Regulation 14 response, therefore, remain to be addressed.

To these ends Alison is still happy to be contacted to progress this further at this address (or can be reached on 07557 014 697) and you will see I am copying her, our Principal Historic Environment Planner and the Herefordshire County Archaeologist, Julian Coton into this response.

In conclusion, Historic England cannot support this housing allocation in its present form but remain hopeful that further discussions will prove productive.

Yours sincerely,

Peter Boland
Historic Places Advisor
peter.boland@HistoricEngland.org.uk

cc:



Latham, James

From: Knight, Matthew
Sent: 01 July 2019 11:31
To: Neighbourhood Planning Team
Subject: RE: Longtown Group Regulation 16 submission neighbourhood development plan consultation

Thank you for consulting the Historic Environment Team.

We would have concerns about the potential for harm to a non-designated heritage asset by the southern housing site within the NDP.

Longtown is a Roman Fort, later adapted to a Motte & Bailey castle with a linear town extending from this. The site is highly important, although not designated as a Conservation Area.

The southern site has the potential to affect the understanding of the history of the wider settlement as the layout already established by the cul-de-sac would not be characteristic of the wider settlement. This would harm the setting of 'The Old Greyhound' Listed at Grade 2: <https://historicengland.org.uk/listing/the-list/list-entry/1078156>. It may be possible to carefully design a scheme which reinforces the linearity of both historic plots and the village, a specific policy or a Conservation Area designation, to help to control the nature of development on this site may be beneficial.

We note that the site does not benefit from an area designation other than the Scheduling of the Castle.

Regards

Matthew Knight

Principal Building Conservation Officer

From: Neighbourhood Planning Team <neighbourhoodplanning@herefordshire.gov.uk>
Sent: 13 June 2019 10:37
Subject: Longtown Group Regulation 16 submission neighbourhood development plan consultation

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The consultation runs from 13 June 2019 to 8 August 2019.

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

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

18 July 2019

Dear Sir / Madam

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

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

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales and National Grid Electricity System Operator (NGESO) operates the electricity transmission network across the UK. The energy is then distributed to the eight electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid previously owned part of the gas distribution system known as 'National Grid Gas Distribution limited (NGGDL). Since May 2018, NGGDL is now a separate entity called 'Cadent Gas'.

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

Specific Comments

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines.

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



Electricity Distribution

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

Appendices - National Grid Assets

Please find attached in:

- Appendix 1 provides a map of the National Grid network across the UK.

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

Lucy Bartley
Consultant Town Planner

n.grid@woodplc.com

Wood E&I Solutions UK Ltd
Nicholls House
Homer Close
Leamington Spa
Warwickshire
CV34 6TT

Spencer Jefferies
Development Liaison Officer, National Grid

box.landandacquisitions@nationalgrid.com

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

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

Yours faithfully

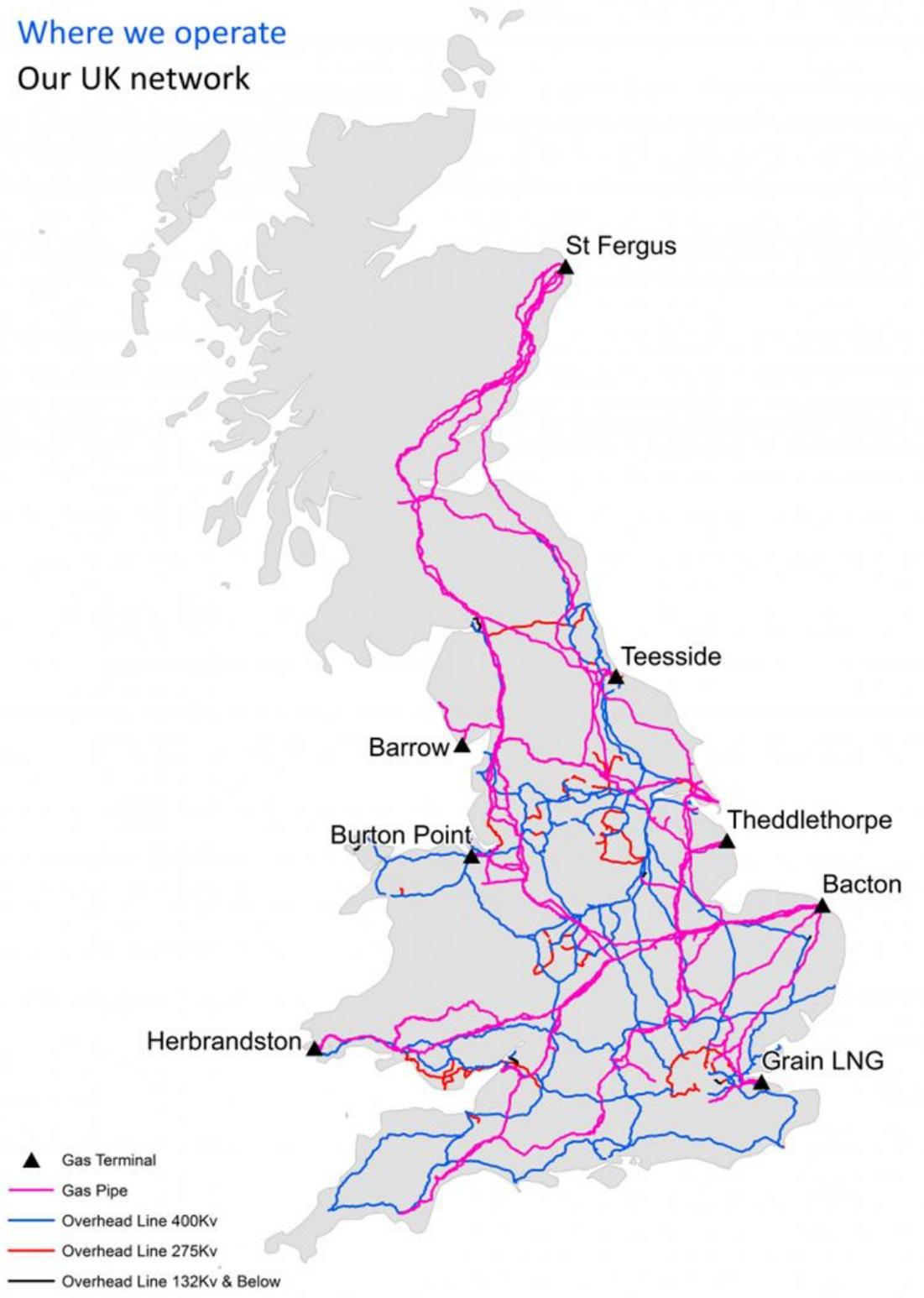
[via email]

Lucy Bartley
Consultant Town Planner

cc. Spencer Jefferies, National Grid

APPENDIX 1: NATIONAL GRID'S UK NETWORK

Where we operate
Our UK network



Latham, James

From:
Sent: 08 August 2019 22:58
To: Neighbourhood Planning Team
Subject: Longtown NDP Reg 16 plan comment
Attachments: Longtown NDP Reg 14 comment.pdf

Dear Sir/Madam

I wish to make brief comments on the NDP.

The introduction of additional clarity and explanation in policies LGPC1 and LGPC 4 (which we commented on at reg 14 stage and our letter is attached as some of the concerns remain) is welcomed. However, we remain of the view that permitting infill ribbon development running northwards out of the village is not necessary to fulfill the CS housing requirements and moreover, will adversely affect the character and setting of the village. We have no objections to additional housing but consider the modest level of housing delivery that will arise from extending the settlement boundary so far north does not justify the adverse impact that will raise.

Whilst the policy reference and intention to retaining green gaps is an improvement, this will be difficult to enforce in practice and over time, it is inevitable that there will be a continuous run of properties from the far northern end of the settlement boundary into the village. The character of this end of the village is primarily clusters of properties orientated to both address the road and at 90 degrees to the road with generous gaps/fields between them. This character will be lost with infill development.

The settlement boundary should not therefore extend north of the Penbailly allocation.

In terms of policy LGPC 4, this is still a little ambiguous and could be interpreted that new build housing is permitted on farms beyond the allowance within national policy for enabling development or exceptional design.

Also, the Longtown settlement boundary has now be drawn to exclude The Crown Public House and properties in this immediate area which I assume is an error as this was not the case at the reg 14 stage. Perhaps the shop should also be within the village settlement boundary?

Thank you for the consideration of these comments

Kind Regards

Russell and Jeanatte Pryce

Longtown Group NDP
Via e-mail

11th March 2019

Longtown Group NDP Regulation 14 consultation

Dear NDP Steering Group

My family and I write as residents of the village in response to the above consultation.

We have belatedly noted the closing date for comments was midday today and therefore apologise for this slightly late response. However, the closing date for comments on Herefordshire Council website is 12th March with no time specified which based on other similar NDP consultations is taken to be midnight on the last date. In light of this inconsistency, I trust my comments will still be considered.

On the whole, the NDP appears well considered in terms of the growth targets and wording of key policies. However, we ask the following changes be considered:

Longtown Settlement Boundary

We object to the settlement boundary extending up beyond the northern housing allocation (LGPC Policy 3). The houses beyond this allocation comprise primarily wayside dwellings with green gaps between. This is a distinctively different character to the village itself which has a more close knit pattern and scale of development. The inclusion of these properties within the settlement boundary will inevitably mean the infilling of the gaps between the houses for a considerable length up the Craswall road to the detriment of the character and setting of the village.

The village is already very elongated, which clearly contributes to its character but this is not justification to exacerbate this pattern of development. To create an accessible and sustainable community, the focus of the settlement boundary should be on creating a more compact village. If a housing buffer is required, there is other land that should be considered for inclusion in a revised settlement boundary. For example, a small pocket of development south of the shop car park would relate well to existing facilities and have an existing built development context. This could be an allocation for say 3-5 houses or simply land included within an enlarged settlement and considered as windfall.

Another option is to enlarge the settlement boundary to allow a small frontage development west and directly opposite the northern housing allocation but not extending beyond the northern boundary of this allocation.

Policy LGPC 3 – Land north of Penbaily

Discussions are ongoing regarding the creation of a new play area next to the village hall. This will provide a much more centralised facility with capacity to accommodate equipment and facilities for different age groups. The Council funding formulae for play equipment off the back of the market housing only on this development will deliver minimal facilities and space on site.

A better solution will be for this development to contribute to the new play area on the village hall site and we recommend this policy wording is amended accordingly.

Similarly, land adjacent to and behind the existing stone barn north of Roman Way would provide a much more accessible overspill car park for the school than this allocation. This landowner should be approached to enquire if this is an option.

Policy LGPC 4 – Residential use on Historic Farmsteads

This policy should be deleted or requires much greater clarity and additional criteria as it is currently open to interpretation and the allowances within this policy are open to abuse in terms of being a back door route to unrestricted market housing in open countryside. This would be contrary to local and national policy and the principles of sustainable development.

National and local policy already supports the conversion of traditional and more modern agricultural buildings to residential and various commercial uses.

National and local policy also allows for affordable exception sites but these are still normally located close to a village rather than a very rural location. Are isolated farms the right location to be encouraging a multi dwelling market and affordable housing scheme??

National policy also permits enabling development, i.e. housing to fund the restoration of heritage assets but this only applies to designated heritage assets (listed buildings). If this allowance is to be maintained in this NDP policy, greater explanation and criteria is required as to how such proposals will be assessed and the tests to be met.

Finally, national policy was changed last year to allow for second dwellings on farms to support succession farming, i.e. a dwelling that allows different generations to remain on the farm (NPPF Paragraph 79).

We question whether this policy is therefore required.

If it is to be retained, the following changes are recommended:

Part I – It is hard to see how ‘multiple dwellings’ could be justified. These words should be removed.

The policy should explain in more detail what is meant by ‘affordable housing’ and the criteria to be met to satisfy this term. Also, that the term local housing need must meet the criteria in policy LGPC 5.

An additional criteria is required to explain how affordable dwellings will remain so in perpetuity.

Part iii – What is the criteria for a live work unit? For example, the normal requirement is that the work space floor area exceeds the residential floorspace and it is a single building.

Paragraph d - We question whether many of the farmsteads listed in appendix A are in fact 'redundant'?

Reference to permitting market housing to subsidise affordable should be deleted. This policy could however be introduced to allow such sites to be released on the fringes of the villages as an addition to policy LGPC1.

Thank you for your consideration of this objection.

Yours sincerely

Russell and Jeanette Pryce

Latham, James

From: Peter Kirby <p.kirby@sunderlands.co.uk>
Sent: 05 August 2019 16:19
To: Neighbourhood Planning Team
Subject: FW: Longtown Parish Neighbourhood Plan
Attachments: SKM_C284e19080515060.pdf

Dear Sir

Sunderlands act for the owners of the parcels of land edged red on the attached plan being adjacent to the proposed settlement boundary and immediately abutting Pontilla HR2 OLG.

We would like to state that this land is available for housing during the plan period. Our clients would also be sympathetic to the nature and scale of housing as set out in Policy LGPC1. In our view the allocation of one or both of these sites would be consistent with the pattern of the development of Longtown with the parcels being in a sustainable location for access to the village facilities.

We shall be grateful if you can consider the site and forward this email to an independent examiner in due course.

Should you require any further information then please do not hesitate to contact me.

Yours sincerely

Peter Kirby BSc (Hons) MRICS FAAV

For and on behalf of Sunderlands

 01432 377068

p.kirby@sunderlands.co.uk



Offa House, St Peters Square, Hereford, HR1 2PQ

Tel: 01432 356161

Also at 3 Pavement House, The Pavement, Hay on Wye, HR3 5BU

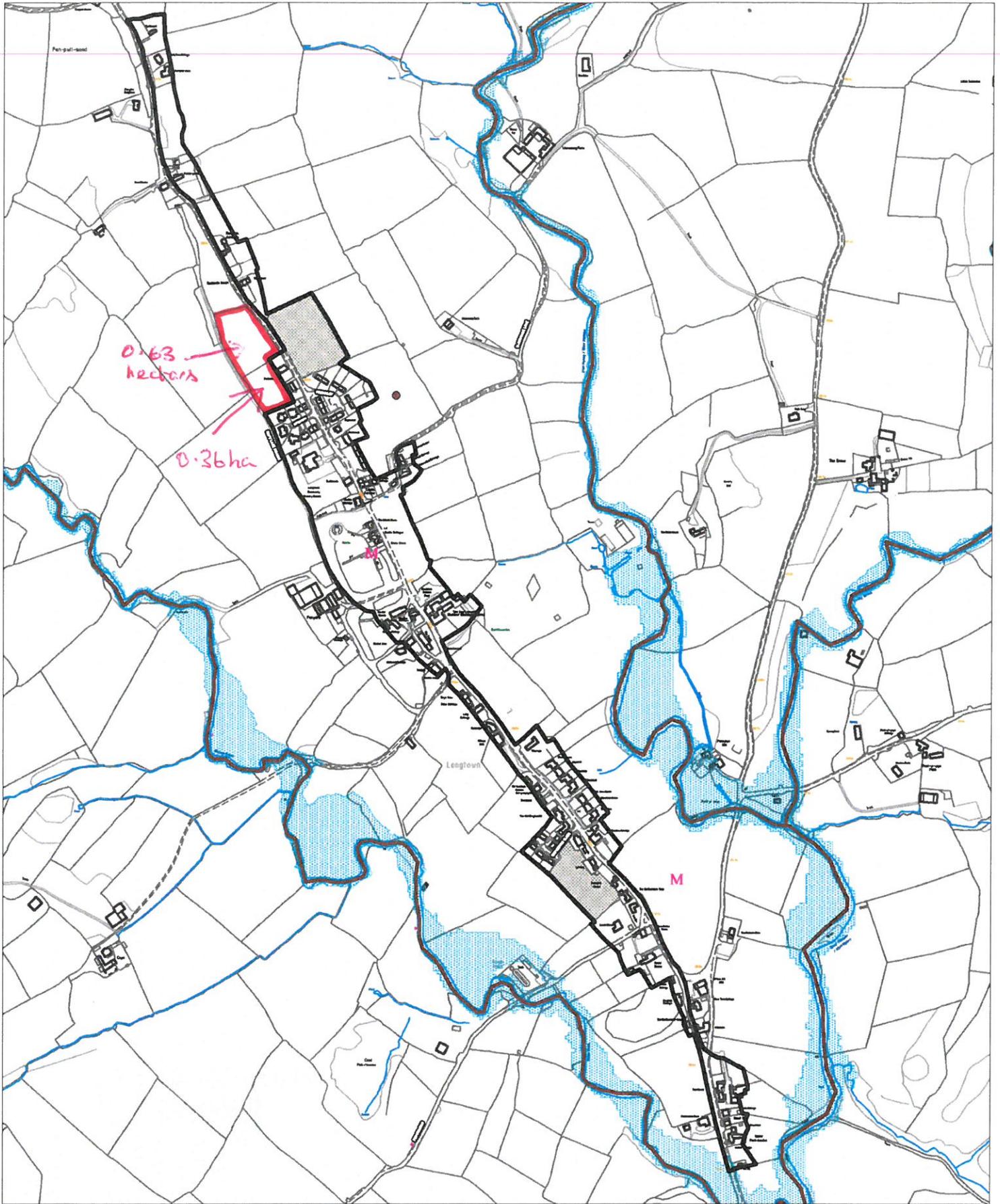
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- Longtown Settlement Boundary (LGPC1)
- Proposed Housing Sites (LGPC2, LGPC3)
- Scheduled Ancient Monuments
- Local Wildlife Site (LWS)

Longtown village Policies Map

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