

## **`EXAMINATION OF THE STRETTON SUGWAS NEIGHBOURHOOD DEVELOPMENT PLAN 2019 - 2031**

### Examiner's comments and questions

I have completed my initial appraisal of the submitted Stretton Sugwas Neighbourhood Development Plan ('the SSNDP') and I have read the written representations made in response to the Regulation 16 consultation. From this appraisal I have identified several policies on which I would appreciate some clarification as to the intended means of implementation. To that end I pose a number of questions to which I require responses by the Sretton Sugwas Parish Council (SSPC) as the 'Qualifying Body' for the preparation of this plan.

In this note I set out the background considerations giving rise to my questions by the use of *italic script*. I raise an issue only where I consider it possible that I may need to recommend that the plan be modified in order that it fully satisfies the basic conditions.

My questions are posed in such a way as to provide the SSPC with an opportunity to respond either to the questions themselves or to my preliminary view(s) (in italics) should that be considered appropriate.

It is my intention that nothing I recommend should come as a surprise. My final conclusions and recommendations will be given in a formal report delivered to the Herefordshire Council and copied top the Parish Council at the end of the examination. It is important that the examination is undertaken in an open and fair manner and any important documents will be made available on the Herefordshire Council website for this plan.

The legislation provides that, as a general rule, the examination is to take the form of the consideration of written representations but an examiner must cause a hearing to be held should it be considered necessary to ensure adequate examination of an issue. At present this seems unlikely but I will confirm the position following receipt of the SSPC written responses to the questions which follow.

John R Mattocks, BSc DipTP MRTPI

Examiner

11 September 2019

## Questions for clarification

Joint responses to the Examiner's Questions from the Steering Group on behalf of the Parish Council and Herefordshire Council are provided in blue text.

### Policy SS4

Q1. The second sentence in Policy SS4 states that the demolition of buildings and structures 'will be resisted'. What is that term intended to mean in practice? *Unless the building is listed or lies within a Conservation Area, demolition is permitted development by virtue of Class B of Part 11 in Schedule 2 to the General permitted Development Order 2015, subject to the conditions thereunder.*

Accepted. This criterion was drawn from the Duchy of Cornwall design guidelines but it is agreed it could either be deleted altogether or replaced with more appropriate wording such as "Wherever practicable, proposals should retain and enhance traditional and buildings and structures which make a positive contribution to the character of the surrounding area."

Q2. *Criterion 8 in Policy SS4 states that all new houses should be adaptable for those with impaired mobility or wheelchair users.* What regard has been had to the Planning Practice Guidance on this matter at paragraphs 56-005 to 56-011? Is it being suggested that locally identified needs would not be met by the application of Part M of the Building Regulations?

This criterion was drawn from the Duchy of Cornwall design guidelines but it is agreed it could be deleted if it is more appropriately covered by Building Regulations. Perhaps retain only the first sentence: "Developments should be accessible to all."

### Settlement Boundaries (Paras. 6.4.1 to 6.4.9.)

Q3. *Paragraph 6.4.5 includes a table of SHLAA sites and in paragraph 6.4.6 it is stated that if developed in their entirety the potential housing numbers would not be in conformity with the 'emerging' (which is an error) Core Strategy. Examination of the SHLAA maps shows that site ref. HLAA/005/001 at Swainshill Church Road is entirely within the settlement boundary.*

a. Is HLAA/005/001 the land referred to in paragraph 6.4.8 as having permission for 8 dwellings?

Planning permission for redeveloping site for 8 dwellings was granted on 5/12/16 for HLAA site HLAA/005/001. Planning application reference 150173. Since 2015 there has been an application for modification or discharge of conditions. Approved Ref 172948. There has also been an outline hybrid application for plots 1,3,4,5,6. Planning application for outline approval ref 191554, decision TBC.

*It also appears that the whole of SHLAA site ref. O/Stsug/001; the frontage of site ref. O/Stsug/002 as well as the frontage of site ref. HLAA/246/001 all lie within the settlement boundary for Stretton Sugwas.*

b. Taken together with the permission for 8 dwellings at the Travellers Rest plus the frontages to the A480 to the north, what is the estimated capacity for housing development within the identified settlement boundaries if developed in accordance with SSNDP policies? Would that raise an issue of general conformity with the adopted Core Strategy?

Core Strategy Policy SS2 states: *'The use of previously developed land in sustainable locations will be encouraged. Residential density will be determined by local character and good quality design. The target net density across the county is between 30 and 50 dwellings per hectare, although this may be less in sensitive areas'*. As Stretton Sugwas is not within a sensitive area but is still considered a rural area, Herefordshire Council considers that a density of 30 dwellings per hectare is considered appropriate.

Taken off a 1:5000 map, for the Duchy area, the area to the south of the school is 0.2 ha and the area to the north and west is 1.35 ha. The corresponding housing numbers at 30 per hectare would be 6 and 40.

Herefordshire Council advises that the Plan is considered to be in general conformity. No conformity issues were raised by Strategic Planning at the Regulation 16 consultation. As indicated, the proportionate growth target for the Hereford housing market area is 18% and Stretton Sugwas have exceeded their housing target growth of 31 by 1. The housing target growth figure is indicative, and acts as a minimum figure for parishes to demonstrate housing growth. There is a large amount of space around Stretton Sugwas academy. If the area around the school was developed, it could provide for additional housing growth within the settlement and support local services.

Sugwas Pool has spaces within the settlement boundary for housing growth, but space for potential development within the settlement boundary it is not considered to disproportionate as low density schemes are expected.

*The reference in paragraph 6.4.9 is to a 'threshold' of 11 dwellings whereas policies SS6 and SS7 set an upper limit of 12 (housing) units. The term 'threshold' in relation to affordable housing provision is used as a lower limit in national policy, meaning that affordable housing should not be sought on sites smaller than the threshold. The Ministerial Statement of 28 November 2014 (to which footnote 14 refers) no longer represents Government policy on affordable housing thresholds. It is now as stated in paragraph 63 of the NPPF (2019).*

c. Would the SSPC wish to suggest amended wording for paragraph 6.4.9?

Suggested replacement wording for 6.4.9 could be as follows:

"The Parish Council would like to see a pattern of development which compliments and supports the existing settlement pattern, ensuring that larger developments are broken up into smaller groups. Several smaller scale developments would be more in keeping with the existing scale of settlements across the Parish and recent developments of between 1 and 4 dwellings in each scheme which have led to gradual, incremental development over a period of several years. It is considered appropriate to limit schemes to around 10 dwellings or fewer rather than to support schemes for major development (insert reference to NPPF definition of major development in a footnote: "See NPPF Annex 2 Glossary for definition of major development: For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more").

Policy SS7 should be amended to refer to 10 units as a maximum number of units in any one scheme for consistency (see below - the second paragraph of SS6 should be deleted).

All references to 12 units should be replaced by references to 10 if a figure is provided.

#### Policies SS6 and SS7

*There is considerable overlap between these two policies and some contradictions in wording. In particular the second paragraph in Policy SS6 and the third criterion in Policy SS7 are similar but not the same, with an additional sentence in Policy SS7.*

Q4. Would the policy intent be more clear and avoid ambiguity if the second paragraph in Policy SS6 was to be deleted?

Yes - accepted. Delete the second paragraph in SS6.

Q5. Would paragraphs 3 and 4 in Policy SS6 apply to any type of development other than housing? If not, would the plan be clearer if they were to be included as criteria under Policy SS7?

Yes - accepted. These 2 paragraphs in SS6 are unlikely to apply to other types of development other than housing and therefore could be deleted from SS6 and moved to SS7.

Q6.a. How is the first sentence in the fifth and final paragraph in Policy SS6 to be applied in decision-making?

The sentence reads "The re-development and re-use of existing brownfield sites and buildings has a priority over greenfield sites provided the site or buildings do not have a high environmental value."

The Parish Council would like to promote a brownfield first approach to development. This is in line with NPPF paragraph 118 which sets out that "planning policies and decisions should:

c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;"

However, it is recognised that in some cases, brownfield land may have a particular environmental value, for instance in terms of biodiversity. Perhaps the sentence would be better worded to improve clarity, for instance:

"Developments are encouraged to prioritise the re-development and re-use of existing brownfield sites and buildings, provided the proposed site or buildings do not have a high environmental value such as for biodiversity."

b. Is there any evidence on the availability of brownfield sites within the settlement boundaries?

The NPPF defines **Previously developed land** as 'Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.'

Several brownfield sites have been given planning consent in the Parish. These include 2 former pubs with associated parking and 1 construction site with parking. We do not believe there are any further brownfield sites within the settlement boundaries.

The PC were content to include land within the settlement boundary to accept more growth than the housing growth target figure, due to the proximity of Stretton Sugwas to Hereford. Discussions with the land owner (Duchy of Cornwall) took place in 2015-2016. This included land north of Stretton Sugwas

and around the school. The area around the school was also assessed in the 2015 SHLAA, and was considered to have high potential and possible to develop within the plan period. The PC felt that Duchy of Cornwall develop schemes that are appropriate and fitting for the parish area. The settlement boundary options were considered by the steering group and two possibilities were proposed for development within the Duchy land. Both options involved less land than that indicated in the 2015 SHLAA. These options were tested at fully advertised open public meetings held in the village hall on Friday/Saturday June 15/16 2018. There was more support for the larger scheme. No objections were raised against either option by members of the public or the Parish Council

c. How would the last sentence be applied in practice? Why a three year period?

This sentence could be deleted. It has probably been carried over from an earlier version of the Plan in error.

d. Does such a strict sequential approach sufficiently reflect current Government policy as stated in the NPPF?

See NPPF paragraph 118c) above. The PC would like to retain wording to the effect that brownfield development should have a priority over greenfield development where practicable.

Q7.a. In the first criterion of Policy SS7 what is the relevance of the size of site as distinct from the scale of development, especially as the latter would be controlled under criteria 2C and 3?

Accepted. The Policy should refer to the scale of development rather than the size of the existing settlement.

Perhaps better wording would be "The proposed site should be well related to the settlement within which it is located and appropriate in terms of scale and character."

If this wording was retained, the final sentence of 3 " Overall development schemes should be of a modest scale and commensurate to the size of the existing settlement" could be deleted.

Also 2C could be slightly reworded to " C. Increase significantly the ~~scale or size~~ of the population of the settlement of the surrounding area or adjacent settlement and lead to an unacceptable adverse impact on existing local services and infrastructure."

b. In what way is this provision different from the second sentence in criterion 3. Are both needed?

See above for suggested changes.

Q8. Is criterion 2A referring to (temporary) disturbance during construction or to more permanent effects on residential amenities? (*The whole of Policy SS7 applies only to housing development*).

2A refers to more permanent effects on residential amenities from new development.

Q9. What is the intention behind criterion 2C? Is it correctly worded? As *Policy SS7 applies only to housing development within the settlement boundaries it could not have any effect on the size of the population of the surrounding area and the reference to the 'adjacent settlement' does not make sense.*

See above.

Q10. In criterion 2D what is meant by 'local rural road networks'? Does that include the 'A' roads?

All roads ie the A roads and country lanes.

Q11. Policy SS7. Criterion 3. *See Q4 above.* Is there any local evidence on the scale of development which would 'maintain the local character of small and fragmented groups of houses and smallholdings'. What is the evidential basis for specifying an upper limit of 12 units?

Please see above. Stretton Sugwas is a very rural parish and is characterised by individual dwellings in large plots and small clusters of more recent development. Examples include:

5 at Zaytoon/Kites Nest

8 at Travellers Rest

8 at The Lakes

4 near Sugwas Pool

(Roman Way is the main original Council housing estate with a mix of accommodation)

The maximum figure of 12 was intended to allow for some larger schemes with an affordable housing element but it is proposed that a more straight forward maximum threshold would be 10 units, in line with the NPPF definition of major development. The original figure of 11 units in the NDP (in line with the Core Strategy) was increased to 12 following consideration of comments at the second Regulation 14 consultation, suggesting the figure of 11 was overly restrictive and provides no flexibility for a prospective developer/house builder (see Consultation Statement, Table 2 Ref No 7.12 p89).

*In paragraph 6.4.9 it is stated that land to the rear and south of Stretton Sugwas Academy has been included within the settlement boundary in order to*

*provide affordable housing. However, the need for affordable housing is not identified as a key planning issue in section 4.1 of the plan nor in any of the objectives.*

Q12. What evidence is available on the need for affordable housing in Stretton Sugwas parish?

A Local Housing Market Needs Assessment was carried out in 2012 and finalised in 2013. Please find link below. These are based on housing market areas.  
[https://www.herefordshire.gov.uk/download/downloads/id/1644/local\\_housing\\_market\\_assessment\\_2013.pdf](https://www.herefordshire.gov.uk/download/downloads/id/1644/local_housing_market_assessment_2013.pdf)

The suggestion that the NDP should include a reference to Affordable Housing was identified by Herefordshire Council in response to the first Reg 14 consultation - see p25 of the Consultation Statement. At the time the PC did not accept that there was a need for affordable housing to be addressed in the NDP as this would be dealt with through policies in the Core Strategy.

However Policy SS6 was amended to include a further criterion addressing local need now (SS6 criterion 6) - please refer to Ref No 16 on p31 of the Consultation Statement.

In the informal consultation on the options for settlement boundaries, older residents were supportive of land being developed to provide affordable housing (See Consultation Statement p55).

Overall there needs to be a balance between promoting small scale developments which reflect existing local character and providing opportunities for affordable housing as part of larger schemes. Affordable housing is not considered to be a priority for the area by the Parish Council.

Q13. To what extent, if any, is the setting of an upper limit of 12 units 'in any one proposal' likely to assist in meeting affordable housing provision?

The Parish Council considers that they do not have evidence of local need for affordable housing and the priority locally is for smaller schemes which respond to local character.

Please refer to Core Strategy Policy H1 which sets out that all new open market housing proposals on sites of more than 10 dwellings will be expected to contribute towards meeting affordable housing needs. The target for affordable housing provision on sites in Hereford Northern and Southern Hinterlands which includes Stretton Sugwas NDP area is 35%.

Schemes for 10 dwellings would be required to provide a contribution towards affordable housing in line with paragraph 63 of the NPPF which sets out that "provision of affordable housing should not be sought for residential developments that are not major developments.

However it is accepted that the opportunities for affordable housing provision in the settlement boundaries of the NDP area are likely to be fairly limited. Developments are likely to be smaller than 10 units in practice, taking into account recent evidence of windfall development that has come forward over the last few years and limited opportunities within the settlement boundaries.

Q14. Would the effect of criterion 4 in Policy SS7 be to encourage developers to develop larger sites in stages so as to avoid the requirements (CS Policy H1) for affordable housing? If that was to occur would it be of concern?

It is possible that by breaking up medium to large sized developments into smaller clusters that developments could come forward in stages. The local priority is for smaller schemes.

Q15. Policy SS7. Criterion 6. How is a developer to know what local needs are? Are they defined anywhere?

The latest housing needs assessment is in 2013 - see link above.

#### Policy SS8 (last paragraph)

Q16. Is the whole of the last paragraph in Policy SS8 intended to relate to 'exception sites' to which CS Policy H2 applies? If so, should the word 'and' in the first line be 'for' i.e. to read 'local need for affordable housing'?

Yes - accepted.

Q17.a. To what extent is it likely that exception sites which are large enough to justify 'a suitable proportion of market housing' would be on 'existing farmsteads and holdings'.

Accepted - this can be deleted

b. Is there evidence to suggest that such locations would meet the requirements of the third criterion in CS Policy H2, that is offering 'reasonable access to a range of services and facilities normally in a settlement'?

The NDP area is located on the edge of the City of Hereford with access to a wide range of services and facilities within a few miles.

The settlements in the NDP area identified in Policy RA2 (Stretton Sugwas and Swainshill) have very few services and facilities - only a church, village hall and school - and other settlements identified in RA2 in other parts of Herefordshire have even fewer. The facilities in the NDP area and those of other settlements just outside the NDP area may be considered reasonably accessible to some or all the smaller locations identified in Policy SS8, given this is a rural area, and many residents are reliant on private cars.

There are buses from Swainshill along the A438 and Stretton Sugwas along the A480 to Hereford.

Q18. Is the policy intended to apply in the case of meeting other forms of local need, such as for an agricultural worker's dwelling? If so, would the Parish Council wish to suggest alternative wording?

No - surely other forms of local need such as for agricultural workers dwellings would be addressed through Core Strategy Policy RA3 and further wording would lead to potential duplication.

#### Policy SS9

*Although Policy SS9 is headed 'New roads' it is clear from the heading and the text in paragraph 6.3.7 that the main concern is the effect of the proposed Hereford bypass on the area.*

*I have ascertained that the preferred route for the bypass (the 'red route') lies entirely to the east, and outside, the neighbourhood plan area.*

Q19. Is it accepted that Policy SS9 cannot apply to any proposal for a new road outside the parish boundary (neighbourhood plan area)?

Following a change of administration earlier this year the decision for progressing with the Hereford bypass has been paused. A cabinet member decision was taken on Friday 9 August to pause and review work on the Hereford bypass.

At this stage there are various options the cabinet have considered together with the views of the ward members.

These options are as follows:

Option A - Pause all work on the Southern Link Road, undertake a review of the project and evidence base to determine next steps and continue work on SWTP active travel measures.

Option B - Pause all work on the Hereford Bypass, undertake a review of the project and evidence base to determine next steps and continue work on HTP active travel measures.

Option C - Stop all work on the South Wye Transport Package.

Option D - Stop all work on the Hereford Transport Package.

Option E - Continue the delivery of the South Wye Transport Package.

Option F - Continue the delivery of the Hereford Transport Package.

Please find the web link below for further detail:

<http://councillors.herefordshire.gov.uk/ieDecisionDetails.aspx?ID=6200>

Yes - it is accepted that the Policy can only apply to proposals for new roads within the NDP boundary.

Q20. Are there any proposals for new roads within the parish during the plan period to which Policy SS9 might apply? If there were how would criterion 1. apply to the choice of routes by the Local Highway Authority?

We are not aware of any new road proposals for Stretton Sugwas within the plan period.

*A statutory policy in a neighbourhood plan can only deal with matters which involve the development and use of land. As stated in Planning Practice Guidance<sup>1</sup>:-*

*Wider community aspirations than those relating to the development and use of land, if set out as part of the plan, would need to be clearly identifiable (for example, set out in a companion document or annex), and it should be made clear in the document that they will not form part of the statutory development plan.*

*Also, the policies in a neighbourhood plan are implemented through decision-making on planning applications, by the local planning authority. Many decisions relating to transport matters are taken by the Local Highways Authority either under the Highways Acts or as permitted development under the provisions of Class A in Part 9 of Schedule 2 to the Town and Country Planning (General Permitted Development) Order 2015.*

*Taking account of the above:-*

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<sup>1</sup> Reference ID: 41-004-20190509

Q21. Is it accepted that such matters as highway lighting and street surfacing and other works within the highway, including 'quiet lanes' and traffic calming measures would be likely to constitute 'permitted development' or not involve development at all?

Yes - accepted.

Q22. Is it accepted that any proposal to obstruct an existing road or right of way and agricultural private accesses would be a matter for consideration under Highways Act powers such as the making of Side Road Orders (not

Yes - accepted.

Q23. Is it accepted that speed limits are not a land-use planning matter and fall entirely within the purview of the Local Highway Authority?

Yes - accepted.

Q24. Would not the whole of Policy SS9 be better treated as a community aspiration to be followed through by the Parish Council rather than dealt with in a 'policy box' which is not 'clearly distinguished' from statutory land-use planning policies?

Yes - accepted.

## EXAMINATION OF THE STRETTON SUGWAS NEIGHBOURHOOD DEVELOPMENT PLAN 2019 - 2031

Examiner's supplementaries to question 3b.

The Steering Group's answers (on behalf of the Parish Council) are provided in blue text.

I have now read the response by the Parish Council and Herefordshire Council to my questions issued on 11 September. For the most part I am satisfied that I have sufficient information to enable me to proceed towards the production of my report but there is one exception.

I have been given only a partial response to my question 3b. in respect of the potential capacity for housing development on the areas identified as lying within the settlement boundaries. No indication is given of the land areas or estimated capacity for the land to the north of the Travellers Inn on both sides of the A480.

I would, therefore, appreciate additional information to address the following supplementary questions:-

1. a. What is the land area of the two areas included within the settlement boundary north of the Travellers Inn and on both sides of the A480?

*Answer:* The area of the land to the east of the A480 is 0.23 ha and the area of the land to the north of the Travellers Rest is 0.21 ha. Total: 0.44 ha.

- b. What would be a reasonable estimate of the number of dwellings which might be erected on those sites taking account of their location within an area identified on Map 4 as being of medium landscape sensitivity and to which NDP policy SS1 would apply?

*Answer:* Herefordshire Council have advised that a density of 30 dph would be appropriate in this location. This would provide for around 13 dwellings across the 2 sites.

*A major road is a clearly defined, easily defensible, boundary which helps to control the encroachment of development into open countryside.*

- a. Using the words of Policy SS1 how likely is it that housing development east of the A480 might be designed to 'enhance local landscape character and reduce potential urbanisation of the rural area'?

*Answer:* The area's inclusion within the Settlement Boundary is a result of historical discussions with the Duchy of Cornwall, who are the landowners. The Steering Group understand that the land to the east of the A480 was formed by the re-arrangement of the road system when the roundabout was built. At the time of the

NDP's early preparation it was understood that the Duchy were considering applying for planning consent for housing on this site. The site was seen as infilling of land to the south of a house belonging to the Duchy and offers the possibility of enhancing by landscaping.

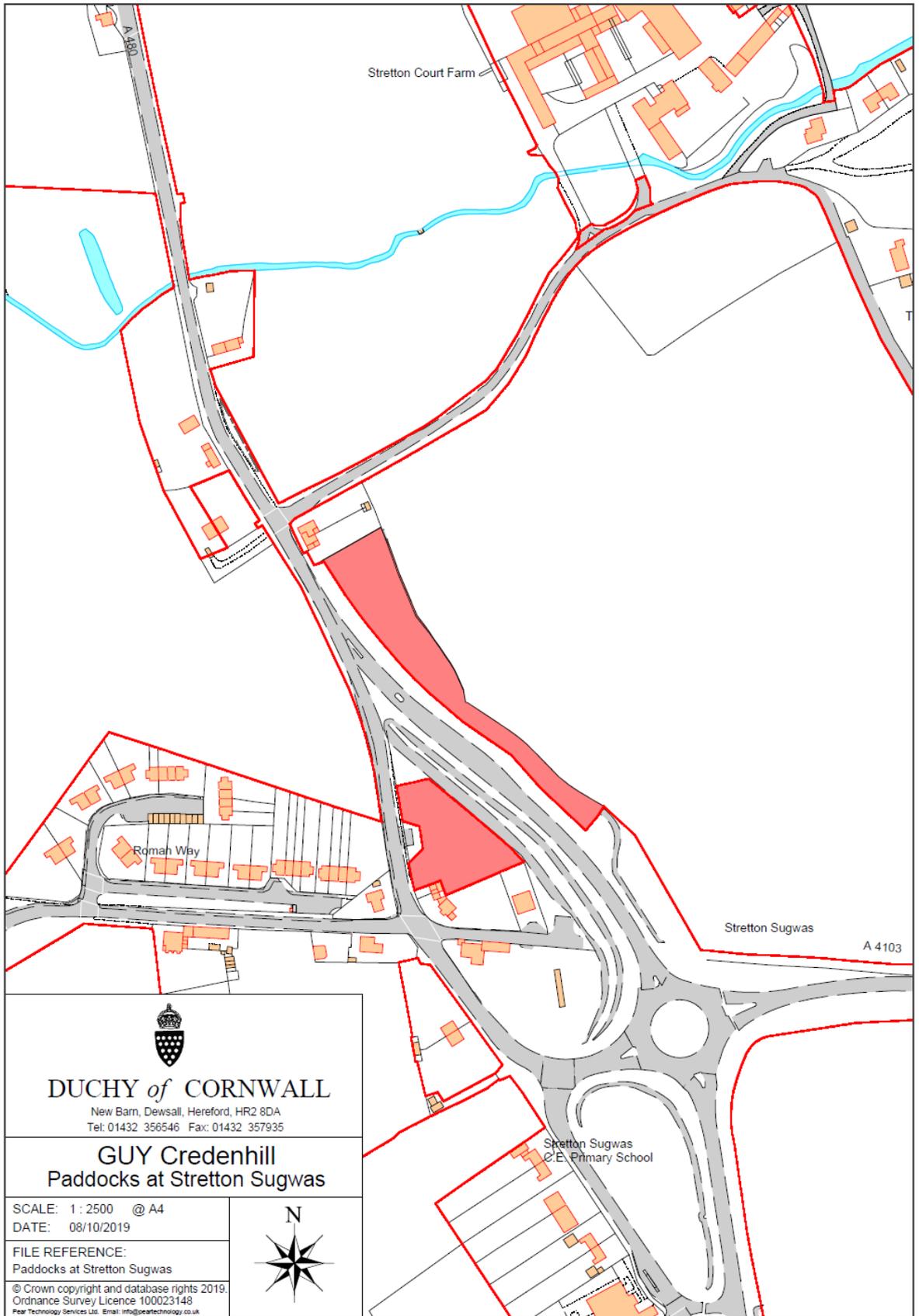
The Duchy have confirmed the following (by email on 8 October 2019):

*"The Duchy of Cornwall has contemplated development on these two sites for some time and is fully committed to developing the land. We had been waiting for the Stretton Sugwas NDP to be finalised. The Duchy has committed a lot of resources on environmental and design reports and it would be incredibly disappointing and frustrating having followed due process if the land were not to be included against the wishes of the Parish Council. There are no environmental constraints to inhibit development and we are ready to submit a planning application with a very carefully designed scheme for each of the two sites."* The original email can be found in appendix 1.

A plan was provided by the Duchy (see below) showing the two sites shaded in red (that are allocated in the draft NDP) within the context of the Duchy's wider landholding.

The Duchy advised *"This is to show the context of the long site (which is served by a right of access) that has two Duchy owned houses adjacent on the northern boundary and a mature hedgerow / defensible boundary along the eastern edge separating it from the open countryside to the east. The shorter site also sits adjacent to housing and lies north of land recently consented for eight homes."*

At present the site to the east of the A480 it is leased by Wyevale Trees and is fully planted up.



The Steering Group and Parish Council would accept that the main road (A480) would form a logical settlement boundary and that the land to the east of the A480 could be deleted from the settlement boundary to protect local landscape character and maintain the separation between the settlement and the edge of the City of Hereford.

- b. In the terms of Policy SS6 would development east of the A480 be likely to 'maintain the local character ...' and how would it 'provide physical and visual linkages to the existing built-up area.'?

Answer: The Steering and Parish Council have not seen detailed designs for the Duchy's proposals and maintaining local character would be a matter for a planning application to address.

There is access to the site near the roundabout and the bus stop for Hereford lies on the same side of the road. The site is across the road from proposed development at the former Traveller's Rest PH site and existing housing to the west.

2. In view of the factors identified above and taking account of the fact that it would be necessary for pedestrians to cross the A480 to access village facilities, in what way does inclusion of the land east of the A480 within the settlement boundary 'contribute to the achievement of sustainable development' (*a basic condition*)?

See answer to a. above.

**The Steering Group would accept a change to the settlement boundary so that the area to the east of the A480 is removed and the settlement boundary follows the line of the road. Most development would then be clustered together to the west of the main road.**

John Mattocks  
Examiner  
03.10.19

## Appendix 1

----- Original message -----

From: Nick Pollock

Date: 08/10/2019 14:04 (GMT+00:00)

To: "shirley.kemeys"

Cc: Charlotte Ibbs

Subject: RE: STRETTON SUGWAS NDP

Dear Shirley

Thank you for your email to my colleague, Charlotte Ibbs. I would be happy for you to forward this email to Examiner.

Stretton Sugwas Parish Council and NDP Steering Group has long given its full support to development on the two sites. The express wish and support of the community is demonstrated by the allocation of the land in the draft NDP.

The Duchy of Cornwall has contemplated development on these two sites for some time and is fully committed to developing the land. We had been waiting for the Stretton Sugwas NDP to be finalised. The Duchy has committed a lot of resources on environmental and design reports and it would be incredibly disappointing and frustrating having followed due process if the land were not to be included against the wishes of the Parish Council. There are no environmental constraints to inhibit development and we are ready to submit a planning application with a very carefully designed scheme for each of the two sites.

I enclose a plan showing the two sites shaded in red (that are allocated in the draft NDP) within the context of the Duchy's wider landholding. This is to show the context of the long site (which is served by a right of access) that has two Duchy owned houses adjacent on the northern boundary and a mature hedgerow / defensible boundary along the eastern edge separating it from the open countryside to the east. The shorter site also sits adjacent to housing and lies north of land recently consented for eight homes.

We would be happy to assist with any further queries that the Examiner may have.

Best wishes

Nick

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9BU [www.duchyofcornwall.org](http://www.duchyofcornwall.org)