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Authority



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For the Attention of: Neighbourhood Planning
Herefordshire Council

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

03 February 2020

Dear Neighbourhood Planning

Cleghonger Neighbourhood Plan - Regulation 16

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

Herefordshire Council
NDP Team
Via e-mail

Our Ref: Clehonger - 5140
Your ref:
Please ask for: Russell Pryce
Direct Line: 01981 242928
Mobile: 07931 808200
E-mail: russell@collinsdb.co.uk

17th February 2020

Dear Sir/Madam

Description: Objection to Clehonger Draft NDP Regulation 16 Consultation

Please find below an objection to the above plan on behalf of the landowner.

The objection only concerns NDP Policy C2 and the proposed settlement boundary. In particular, we recommend the settlement boundary is expanded to include additional land along the south side of Gosmore Road.

Following receipt of positive pre-planning advice last year, an outline application was submitted for ten dwellings (ref 192855/O) on land south of Gosmore Road ('the site') and attached to this letter is a location plan and indicative layout plan for the land in question. The application is presently undetermined but the outstanding technical issues are in the process of being resolved.

Clehonger is one of the most sustainable villages in the Hereford Housing Market Area scoring very highly on the council's sustainability matrix that underpins the CS rural housing policies in terms of services, amenities and public transport links. Therefore, notwithstanding that Clehonger has exceeded their minimum CS growth target, it remains a sustainable location for additional housing. Furthermore, the CS target is a minimum and in order to reinforce sustainable development principles set out in the Core Strategy and NPPF, there is a need to focus additional housing into the more sustainable settlements in the County.

The Council have confirmed that the site adjoins the existing edge of the village and built area thus meeting the gateway test within Core Strategy (CS) Policy RA2. The extent of built up area is also clearly changing as the Persimmon Homes development immediately to the north gets built out. There is already three properties along the eastern site boundary that identify the entrance into the village travelling west along Gosmore Road. Consequently, the site is effectively an infill development between existing properties rounding off the south east corner of the settlement as opposed to an uncharacteristic incursion into open countryside.

Our proposed housing mix ties in with the need identified in the questionnaire survey and set out in draft NDP policy C3. In particular, the development will predominantly comprise of smaller two and three bed properties including bungalows.

Homes will all be south facing to maximise passive solar gain also then enabling the provision of solar PV on the south roofs slopes thus minimising future carbon impact and associated energy bills. The site can also provide safe new footpath links to village amenities and the school thus addressing some of the NDP Community Actions as follows:

CA1 Highways – road safety and traffic speed Clehonger Parish Council will continue to work with Herefordshire Council, West Mercia Police and the Safer Roads Partnership others to identify and implement measures to address the issues raised where possible, to include seeking traffic calming and the enforcement and further introduction of speed limits.
CA2 Highways – parking in Clehonger Clehonger Parish Council will continue to address roadside parking issues in the village particularly at the Primary School by seeking ways of reducing car use for short trips and promoting alternative parking solutions.
CA5 Walking and cycling Clehonger Parish Council will continue to work with landowners to promote the maintenance of public rights of way throughout the Parish and to seek improvements to connectivity in and around the village to foster walking and cycling as alternatives to use of the private car for short trips.
Proposals to address CA 1, 2 and 5
➤ New footpath link between the site and primary school with a further link into the local public right of way network
➤ Extend 30mph speed limit NE along Gosmore Road past the proposed development site

This scale of off-site infrastructure provision goes beyond what would normally be required or expected from a development of up to ten dwellings but the applicant is prepared to deliver this as it is recognised that this site is likely to be the only opportunity to deliver some of these Community Actions affecting the local area.

A more detailed technical analysis of the site is appended to this letter but in summary, the expansion of the settlement boundary to accommodate this site as a small allocation or windfall opportunity will enable the delivery of several community benefits as well as a sustainable housing development that integrates with and respects the character and settlement pattern of the village.

The development can also satisfy all the key policy requirements of the draft NDP and adopted development plan policies in relation to matters such as safeguarding local amenity, safe access and footpath connections, enhancing ecology, landscape mitigation, sustainable layout and drainage.

I would appreciate consideration of this representation and incorporate a modest expansion of the settlement boundary to accommodate this small site.

Yours faithfully

**Russell Pryce MRTPI
Planning Manager**

Appendix 1 – Location Plan

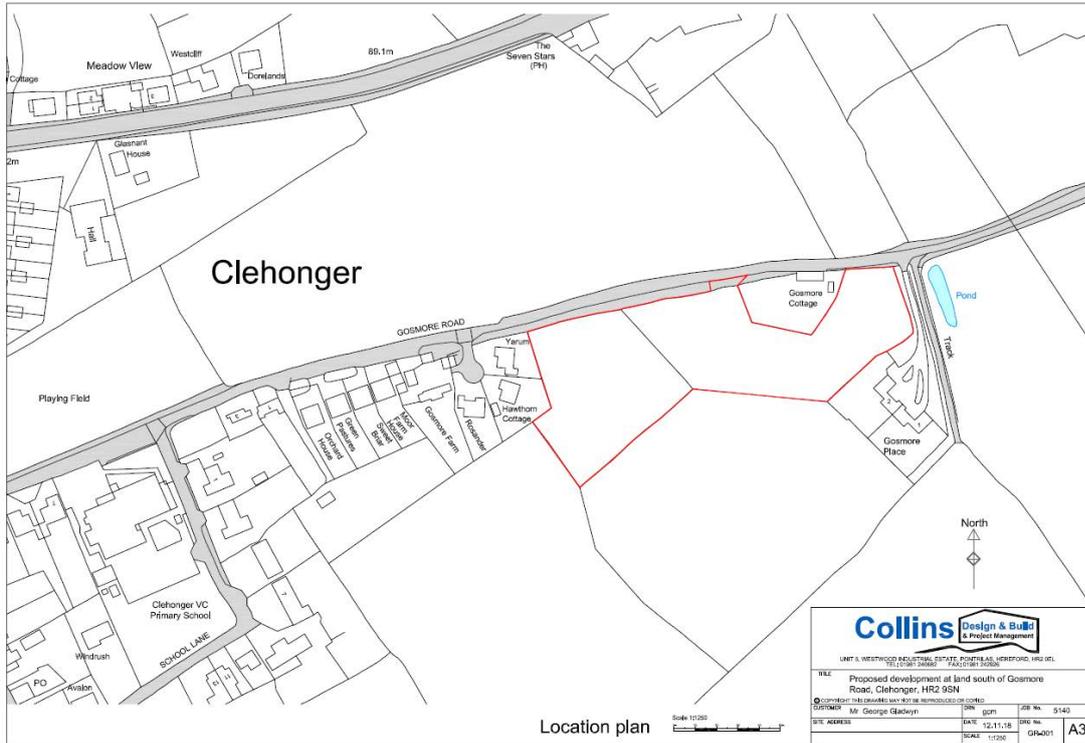
Appendix 2 – Draft Proposed Layout

Appendix 3 – Summary Technical Site assessment

Appendix 3 - Summary Technical Site Assessment

Site Location and Description

The site comprises of a small paddock and small part of a larger agricultural field located immediately south of Gosmore Road (U73239) in the south eastern corner of Clehonger. Immediately west is a small oval cul-de-sack of four detached properties, dissecting the site to the east is a detached property (Gosmore Cottage) beyond which is a pair of semi detached properties (Gosmore Place). North is the Persimmon Homes development currently under construction. The site is marked with a red outline on the aerial image below.



The site is served by a field access off Gosmore Road and public footpath number CH12 runs along part of the eastern boundary northwards across Gosmore Road.

Persimmon Homes are in the process of constructing 80 dwellings on land immediately north of the site. Below is a copy of their approved reserved matters layout.



The Proposal

This proposal is for the construction of up to ten dwellings and bungalows. The indicative mix set out on the accompanying layout plan comprises a mixture of two, three and four bed semi-detached, detached and bungalows with the focus being on smaller two and three bed properties.

Indicative site plan 1:1000



The existing access into the field would be used and upgraded to adoptable standard including and turning head. The road is offset to safeguard the root zone of the large oak trees.

Foul drainage will be a private package treatment plant and soakaways until such time as capacity becomes available in the public sewerage network.

Technical Considerations

The development area has been carefully considered to form a logical extension of the settlement. The southern boundary follows the existing southern field boundary defined by a native hedge continuing eastwards to effectively infill a gap between existing properties at the eastern end of the site.

The pattern of development west of the site is also very mixed and adhoc in term of the size, design, scale and orientation of houses. Houses are generally linear in layout following and addressing the roads that they gain access from. This form of development

is repeated in the Persimmon Homes development. In this regard, the layout is in keeping with the existing character and pattern of development.

Existing properties in the south side of Gosmore Road are predominantly detached and semi-detached properties set within reasonable size plots. The proposal also harmonises with this existing pattern, character and density of development. The layout also provides all plots with a direct southerly aspect to take advantage of passive solar gain.

As the site will be enclosed on three sides with existing and proposed new housing, visually, the development will assimilate with this residential context. The site also has no landscape designation and with new hedge and tree planting along the southern boundary, the development will have negligible impact on the Principal Settled Farmlands landscape character type.

The site is actively farmed and grazed with livestock. It is therefore of low ecological value and the development will offer opportunities to enhance the ecological value of the site through new native tree and hedge planting.

A safe access can be provided with new footpath connections along Gosmore Road to local amenities and the school. The layout also includes a connection on to public footpath CH12 running north into the Persimmon development.

Surface water will be managed through infiltration largely on plot. As there is presently limited foul drainage capacity in Clehonger, a communal package treatment plant is proposed and ample land exist south of the development area to accommodate the required soakaway and we have already verified that the ground conditions will support soakaways.

Latham, James

From: Norman Ryan <Ryan.Norman@dwrcymru.com>
Sent: 12 February 2020 11:05
To: Neighbourhood Planning Team
Subject: {Disarmed} RE: Clehonger Regulation 16 submission neighbourhood development plan consultation

Follow Up Flag: Follow up
Flag Status: Completed

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

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

As you may be aware, we were consulted at the Regulation 14 consultation last year and as such have no further comments to make at this time.

If you require any further information, please let me know.

Kind regards,



Ryan Norman

Lead Forward Plans Officer | Developer Services |
Dŵr Cymru Welsh Water

T: 0800 917 2652 | E: 40719

A: PO Box 3146, Cardiff, CF30 0EH



W: dwrcymru.com

E: developer.services@dwrcymru.com

From: Neighbourhood Planning Team <neighbourhoodplanning@herefordshire.gov.uk>
Sent: 09 January 2020 11:58
To:
Subject: Clehonger Regulation 16 submission neighbourhood development plan consultation

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

Dear Consultee,

Clehonger 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: **[MailScanner has detected a possible fraud attempt from "eur03.safelinks.protection.outlook.com" claiming to be https://www.herefordshire.gov.uk/directory_record/3044/clehonger_neighbourhood_development_plan](https://www.herefordshire.gov.uk/directory_record/3044/clehonger_neighbourhood_development_plan)**

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T: 01260 288800

www.gladman.co.uk

By email only to: neighbourhoodplanning@herefordshire.gov.uk

Re: Clehonger Neighbourhood Plan Regulation 16 Consultation

Dear Sir/Madam,

This letter provides Gladman's representations in response to the draft version of the Clehonger Neighbourhood Plan 2011-2031 (CNP) under Regulation 16 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 experience that these representations are prepared.

Legal Requirements

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 CNP must meet are as follows:

- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.*
- (d) The making of the order contributes to the achievement of sustainable development.*
- (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).*
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.*
- (g) Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).*

National Planning Policy Framework and Guidance

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. This version was itself superseded on the 19th February 2019, with the latest version, largely only making alterations to the Government's approach for the Appropriate Assessment as set out in Paragraph 177, clarification to footnote 37 and amendments to the definition of 'deliverable' in Annex 2.

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.

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.

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 of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.

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.

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. 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 positively to the wider opportunities for growth.

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.

Relationship to Local Plan

To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in

the adopted Development Plan. The adopted Development Plan relevant to the preparation of the CNP is the Herefordshire Local Plan Core Strategy 2011-2031 (HCS), adopted in October 2015. The HCS provides the vision, objectives and spatial strategy for the district over the plan period 2011 – 2031. The CNP should therefore seek to support and meet those policies contained in the HCS.

The housing requirement set out in the strategic housing policy sets out that the Council is required to deliver at least 16,500 dwellings over the plan period. This figure is reliant on the delivery of large strategic sites and neighbourhood plans allocating sites for a combined total of 5,300 dwellings. Policy RA1 of the HCS sets approximate housing numbers across the 7 Rural HMAs but does not set specific settlement targets for the neighbourhood areas. Therefore, the CNP should not seek to constrain potential sustainable development opportunities from coming forward.

Cleghonger Neighbourhood Plan

This section highlights the key issues that Gladman would like to raise with regards to the content of the CNP 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.

Policy C1: Sustainable development

This policy states that development proposals which contribute to the sustainable development of the Cleghonger Neighbourhood Area will be supported. The policy then includes 5 objectives against which a proposal will be assessed. This policy must be sufficiently flexible to allow sustainable development within the Neighbourhood Area and the emphasis within the policy should be on the balancing of the objectives outlined.

Policy C2: Cleghonger settlement boundary

This policy defines the settlement boundary for Cleghonger and supports proposals for housing within the settlement boundary with respect to design and housing mix, Policy C6 and Policy C3.

Gladman object to the use of settlement limits in circumstances such as this where they would preclude otherwise sustainable development from coming forward. The Framework is clear that development which is sustainable should go ahead without delay. The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements does not accord with the positive approach to growth required by the Framework. As such, Gladman suggest that this policy should be worded more flexibly in the interim to the progression of the Herefordshire Core Strategy Partial Review in accordance with Paragraphs 11 and 16(b) of the NPPF (2019) and the requirement for policies to be sufficiently flexible to adapt to rapid change and prepared positively.

Accordingly, Gladman consider that the above policy should be modified to allow for this flexibility, and it is considered that the CNP would be better served by a criteria-based approach consistent with the requirements of national policy and the following wording is put forward for consideration:

“The neighbourhood plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Development proposals that accord with the policies of the Development Plan and the Neighbourhood Plan will be supported particularly where they provide:

- **New homes including market and affordable housing; or**
- **Opportunities for new business facilities through new or expanded premises; or**
- **Infrastructure to ensure the continued vitality and viability of the neighbourhood area.**

Development proposals that are considered sustainable and well related to the existing settlement will be supported provided that the adverse impacts do not significantly and demonstrably outweigh the benefits of development.”

Gladman have seen changes made to other neighbourhood plans prepared in a similar context to that of the CNP. One such example is the examination of the Godmanchester Neighbourhood Plan. Paragraph 4.12 of the Examiner’s Report states:

“...Policy GMC1 should be modified to state that “Development ...shall be focused within or adjoining the settlement boundary as identified in the plan.” It should be made clear that any new development should be either infill or of a minor or moderate scale, so that the local distinctiveness of the settlement is not compromised. PM2 should be made to achieve this flexibility and ensure regard is had to the NPPF and the promotion of sustainable development. PM2 is also needed to ensure that the GNP will be in general conformity with the aims for new housing development in the Core Strategy and align with similar aims in the emerging Local Plan.”

A further example is the Deddington Neighbourhood Plan. In this example, the Examiner recommended changes to the approach to support development proposals within and adjacent to the settlement limits as the policy was not sufficiently evidence based and would have the clear possibility of restricting the supply of new housing in the plan period, contrary to Paragraph 47 of the NPPF(2012).¹ Gladman suggest that similar changes could be made to the CNP, this will be important to ensure that the plan meets basic condition (a).

It is highly likely that the housing needs of Clehonger will increase in the near future, through the review of the HCS, and limiting the provision of housing that the CNP is providing will not allow the plan to be effective for its duration. The policies of the CNP will be quickly superseded by the HCS

¹ Paragraphs 7.20 through to 7.25 of <https://www.cherwell.gov.uk/download/downloads/id/9160/deddington-examiners-report-03092019.pdf>

Review should they not be drafted in such a way to allow for sufficient flexibility towards changing needs.

Policy C3: Housing mix

Policy C3 seeks to support development proposals which provide housing of a suitable size, tenure and style to meet local needs. The inclusion of the phrase 'local needs' creates a policy which limits the potential for sustainable development as a result of difficulty in evidencing an appropriate level of local need – rather than there not being a local need to evidence.

Accordingly, Gladman consider that the above policy should be modified to allow for a level of flexibility in its approach. This can be achieved by the policy instead relying on the submission of a housing mix acceptable to Herefordshire Council.

Conclusions

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 consultation response, Gladman has sought to clarify the relation of the CNP as currently proposed with the requirements of national planning policy and the strategic policies for the wider area. 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.

Yours faithfully,

Alasdair Thorne

Planner

Gladman

a.thorne@gladman.co.uk

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16 January 2020

avisonyoung.co.uk

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

Dear Sir / Madam

**CLEHONGER NEIGHBOURHOOD PLAN: REGULATION 16 CONSULTATION
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

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 Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Response

We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning their networks.

Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

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 their assets. Please remember to consult

National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.

We would be grateful if you could add our details shown below to your consultation database, if they are not already included:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Spencer Jefferies, Town Planner

box.landandacquisitions@nationalgrid.com

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

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

Matt Verlander MRTPI
Director
0191 269 0094
matt.verlander@avisonyoung.com
For and on behalf of Avison Young

Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's 'Guidelines when working near National Grid Gas assets' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

- National Grid's Plant Protection team: plantprotection@nationalgrid.com

Cadent Plant Protection Team
Block 1
Brick Kiln Street
Hinckley
LE10 0NA
0800 688 588

or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>



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

Your ref:
Our ref:
Email: Sarah.faulkner@nfu.org.uk
Direct line: 01952 400500
Date: 07/02/2020

Dear Sir,

Clehonger Neighbourhood Development Plan Consultation – NFU Response

The West Midlands NFU welcomes the opportunity to comment on the Clehonger Neighbourhood Development Plan. The West Midlands NFU represents approximately 5400 Farmers and Growers across the West Midlands region and over 50,000 farmers and growers nationally. In Herefordshire we represent over 1000 farmers and landowners. Our response is given below along with some key priorities.

As you will be aware the farming community continues to face formidable challenges with increasing regulation, volatile markets and fluctuating farming returns. In response to these challenges farmers have had to consider the resources available to them and look at new ways of developing their businesses so that they can grow and remain competitive. This might include the need for modern agricultural buildings either to meet regulations or to change the use of existing buildings in order to respond to changing market demand.

Our members in Clehonger are no exception and given that the area is largely rural it is clear that any form of Neighbourhood Plan must adequately the issues and opportunities of farming. Our vision for the area is:

Clehonger is a sustainable rural community that is underpinned by an innovative rural economy, and thriving farming and food industry, which is profitable and supports viable livelihoods, underpins sustainable and healthier communities and enhances the environmental assets that are vital to the counties prosperity.

For the farming community this vision is to be achieved by the following themes

1. Strengthening our farming businesses to help them build profitability and respond to new opportunities
2. To create thriving localities that meet the needs of their communities, businesses and their environment.
3. Realising the value of the region's environmental assets

In addition we would see some of the key priorities for farms to include (not in order of priority):

1. The ability for the next generation to take on management of farms and to support this through the provision of affordable housing to allow succession.
2. Develop farming enterprises that can meet the challenges of food security through modernising and becoming more efficient
3. Diversifying farming enterprises to meet new opportunities such as, *inter alia*, business units or tourism.
4. Developing renewable energy which meets the needs of the farm and are appropriate to the location and renewable resources available.
5. Access to high speed broadband and mobile phone coverage.

Food production is a key priority for economic growth both nationally but also importantly in a rural area such as Clehonger. In the Government white paper '*Local Growth: realising every place's potential*' the Coalition Government makes clear that the first priority "*is to return the nation's economy to health*". This includes creating, "*the conditions that will help business and gets the economy growing*" and this includes the support for farming enterprises so vital to the rural economy and enabling them to remain viable through diversified enterprises. We would expect that any proposals for developing farms will take this into account.

Diversification is in line with National Planning Policy Framework (NPPF) that provides that local authorities should support development that enables farmers to become more competitive and sustainable and diversify into new opportunities. A key message within the NPPF is the need for economic growth. "*A positive planning system is essential, because without growth, a sustainable future cannot be achieved. Therefore, significant weight should be placed on the need to support economic growth through the planning system...the default answer to development proposals is yes.*" Clehonger neighbourhood plan has the opportunity to help

support farms diversify and create new employment and income opportunities for the area. These will range from the provision of business units through to farm shops.

In the NPPF the government makes a number of very important statements related to this the development of renewable energy. Paragraphs 95 to 98 make a number key points including: *'local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources'* (para 97); *'have a positive strategy to promote energy from renewable and low carbon sources'* which *'maximise renewable and low carbon energy sources'*. Renewable energy represents an important opportunity for farms to reduce their energy bills and also to create revenue that can help support farming activity. We understand that this can be a contentious issue within communities as has been highlighted by the government with the policy it has introduced for requiring areas to be identified for wind development in local or neighbourhood plans such as yours. Some of our members will be looking to erect wind turbines for electricity to be used on farm at a very small scale. We ask that you consider the issue of scale and how you can support our farmers.

Succession within farming businesses is often critical to their ongoing sustainability. This will often require the need for additional housing to enable the next generation to take over the farming enterprise and to allow the current generation to take a less involved role. We ask that the neighbour hood plan supports farms to build new housing.

To help guide any work we have developed some principles which we believe will help Clehonger shape any activity in the area. These are:

- Food security is a crucial issue for now and the future and any actions must ensure that we do not compromise our ability to feed ourselves
- We should look to increase farm productivity and decrease impact on the environment.
- The achievement of sustainable development in rural areas through the integration of environmental, social and economic objectives.
- Meet the needs of a diverse rural population and ensure equality of opportunity.
- Maintain and enhance the areas natural asset base.
- Farmers and landowners should always be consulted and listened to with regard to developing the area.
- Support sustainable growth in the rural economy.

- Sustainable farming will support the wider community.
- Not one system of farming is the answer and all should be supported for maximum benefit to society and the environment
- Encourage links between rural areas and urban centres.

Many thanks for the opportunity to respond to this consultation and we hope that these comments are helpful and will be taken into account.

Yours faithfully

Sarah Faulkner

Regional Environment Adviser

20 February 2020



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Sent via email: neighbourhoodplanning@herefordshire.gov.uk

Dear Sir / Madam,

**Response to the Submission Draft (Regulation 16) Clehonger Neighbourhood Development Plan
Former Belmont Golf Course, Hereford**

On behalf of Golf Inns Limited ('our client'), we are writing to respond to the consultation on the Submission Draft version of the Clehonger Neighbourhood Development Plan ('the Submission NP'). Our client owns the former Belmont Golf Course ('the site') which is partially located within Clehonger Parish.

The four key points we have raised in our response to the Submission NP are as follows:

1. Additional land than that allocated in the Belmont Rural NP is required to enable the renovation of Grade II* Listed Belmont House.
2. Notwithstanding that the Submission NP does not propose to allocate any additional sites for residential use above that which is currently committed, there is evidence of a housing shortfall within the County as a whole. We consider that additional land should be allocated within the Submission NP that can be delivered in the short – medium term in order to assist in addressing the County's housing need.
3. Policies within the NP are negatively worded and do not therefore comply with the requirements of the National Planning Policy Framework ('NPPF') that plans should be prepared positively (paragraph 16).
4. Change is anticipated within the area when the proposed western relief road is constructed. We consider that the NP should do more to anticipate this opportunity to accord with paragraph 22 of the NPPF.

Site Context

We provided site context in our response to the Draft NP consultation in July 2019, however for ease of reference we set out below a summary of the land our client is promoting for residential development.

Our client's land is split between the parishes of Clehonger and Belmont Rural. The former Belmont Golf Course covers approximately 84 hectares (208 acres) of which around 40 hectares (99 acres) falls within Clehonger's NP Area. Since the closure of the golf course in March 2014, the land has been used for livestock grazing purposes as has the area of land to the south of the former golf course. The site is adjacent to the city of Hereford and is in close proximity to the range of shops, services and facilities that are located in the city. It is therefore considered to be a sustainable and appropriate location for residential development. Additionally, the proposed routes of the proposed Western Relief Road currently propose to bisect our client's land which we consider will improve accessibility to both the site and the western part of Hereford.

In Savills' most recent representations to the Hereford Area Plan ('HAP'), we submitted a Site Location Plan which identified three potential development parcels (including the additional land parcel Bel08 which is allocated in the 'made' Belmont Rural Development Plan) within Belmont Rural parish, which could be

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developed for residential use. We also recently submitted representations to Herefordshire County Council's ('HCC') Rural Areas Site Allocations Development Plan Document ('RASADPD') Strategic Housing Land Availability Assessment consultation, requesting that the part of the former golf course which falls within Clehonger parish is also assessed for residential development. We have attached the 'Revised Potential Development Parcels Plan' that was submitted with our RASADPD and Clehonger Draft NP representations which shows the areas of land that are client is promoting. Site 4 falls within Clehonger's Neighbourhood Plan Area.

All of the sites identified on the plan enclosed are in Flood Zone 1 and seek to avoid other areas of environmental and heritage constraints which include the Grade II* listed Belmont House, Grade II listed Walled Garden and Stone and Plaque, Belmont House unregistered park and garden, woodland areas and the Site of Importance for Nature Conservation. Sites 1 to 3 are located within Belmont Rural parish and Site 4 falls within Clehonger parish:

- Site 1 (purple boundary) – 1 hectare / 2.5 acres
- Site 2 (orange boundary) – 5 hectares / 12 acres)
- Site 3 Post 2022 Development Parcel (orange hatched boundary) – 11 hectares / 28 acres
- Site 4 (blue boundary) - 33 hectares / 83 acres

By allocating Sites 1 and 2 in addition to site Bel08, it should provide sufficient development to enable the redevelopment of Belmont House in the short to medium term. Allocating Sites 3 and 4 will allow for the medium – long term delivery of housing to meet the current and future housing needs of Herefordshire without significantly impacting the residents of Clehonger Parish due to its distance from the settlement.

The Submission NP Consultation Statement (October 2019) sets out the Parish Council's response to the promotion of our client's site. The Parish Council state that *"the scale of development already provided and committed at Clehonger is such that it is not necessary to allocate a reserve site or sites to provide surety that the minimum housing requirement will be met. In any event the proposed site:*

- *Lacks any discernible relationship to Clehonger village and its services and facilities;*
- *Is poorly-related to Hereford until other significant development and infrastructure is completed;*
- *Is excessive when compared to the scale of proportionate housing growth envisaged for the Neighbourhood Area by the Local Plan Core Strategy."*

In response to the Parish Council's comments on our client's site, we agree that the site is not adjacent to Clehonger settlement and its services and facilities. However, the site is adjacent to Hereford city which is the largest and most sustainable settlement in the County (Core Policy SS2). Although we agree that the proposed western relief road will indeed improve accessibility to our client's land, even without the relief road the site can easily access the wide variety of services and facilities provided within Hereford city. We therefore disagree with the Parish Council that the site is "poorly-related" to Hereford. We acknowledge that the scale of the site proposed is not proportionate to the settlement of Clehonger. However, the development of our client's land will have a limited impact on the settlement of Clehonger as future residents will be closer to Hereford and we would therefore expect them to use the services and facilities that the City offers.

Paragraph 29 of the NPPF states that *"Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan"*. As we set out in our response to the Submission NP below, we consider that the Parish Council should use the Clehonger NP to direct growth to sustainable locations in the NP area and make the most from the potential development opportunities that the western relief road will bring.

Cleghonger Submission Draft Neighbourhood Plan Comments

Housing Delivery

In our response to the Draft NP, we stated that the Parish Council were not taking a positive approach to plan-making by not allocating any additional residential sites within the NP. In the Draft NP, the Parish Council claimed to have exceeded its housing requirement set by the Core Strategy by 103%. The Submission NP now states that the housing currently committed within the NP Area now exceeds the Core Strategy's housing requirement by 107% and as such the Parish Council consider their approach to not allocating any additional sites is sound. The housing requirement in the Core Strategy should be used as a minimum requirement. Therefore the HAP, RASADPD and NPs within the County should be providing more dwellings than this in order to ensure that the County's housing need is met.

The Issues and Options version of the RASADPD (June 2017) emphasised that the document will not replace NPs that were already made or being produced so HCC intend to allow NP's to lead on the location of growth within settlements outside of Hereford. HCC's Annual Monitoring Report ('AMR') (2019) sets out that the total number of dwellings completed, committed and allocated at 1 April 2019 in NP areas only amounts to 68 dwellings more than the total housing requirement. We do not consider that this offers sufficient flexibility in order for the County to adapt and respond to any changes in the housing market and potential delays in the delivery of committed dwellings.

Additionally, HCC's 5 Year Housing Land Supply position in 2019 was 4.05 years and the Housing Delivery Test (November 2019) sets out that HCC is delivering 74% of its housing requirement which means that a 20% buffer should be applied to 5YHLS. If HCC continue to fall below 75% at November 2020, footnote 7 of the NPPF and relevant development plan policies (which will include the Cleghonger NP policies when it is made) will be out of date when determining planning applications. Although we acknowledge that this is a County wide matter, as NP's are playing an important role in identifying sites for development in the RASADPD, Cleghonger is in a position to be able to allocate deliverable sites that can be delivered in the short / medium term to assist the County in meeting their housing requirement and avoid falling below the Housing Delivery Test threshold.

Core Strategy policy SS3 states that where the supply of housing land is below the cumulative target figure over a 12-month monitoring period, HCC will prioritise increasing housing supply by partially reviewing their Core Strategy, preparing new Development Plan Documents or the preparation of an interim position statement. The preparation of the HAP and RASADPDs has been delayed therefore we consider that more should be done by HCC in order to address the housing shortfall. One potential option could be to require emerging NPs, such as the Cleghonger NP, to allocate additional deliverable housing sites to meet the need.

The Submission NP states that the proposed windfall allowance for the NP area will be a total of 15 dwellings between 2019 – 2031 (12 year period). Paragraph 70 of the NPPF states that "*any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends*" [Savills emphasis]. The Submission NP states that there have been 41 windfall units since 2011 (8 year period). We do not consider that historic windfall delivery rates have been taken into account when calculating the windfall allowance within the NP as the proposed 15 dwelling allowance is significantly lower than what has been delivered in the settlement over the last 8 years. We therefore do not consider that the NP accords with paragraph 16 of the NPPF which requires plans to be aspirational and deliverable.

In summary we do not consider that the NP ensures that a sufficient number and range of homes will be provided to meet the needs of future generations (Social Objective, paragraph 8 of the NPPF) and it therefore does not meet basic condition d. (paragraph 8(2)(d) of schedule 4B of the Localism Act 2011) which requires NPs to demonstrate that they contribute towards sustainable development. In order to meet the basic conditions, we consider that additional sites should be allocated within the Cleghonger NP.

Policy C3

In our response to Policy C3 in the Draft NP, we requested that it be reworded to be more flexible and positive in regards to the proposed housing mix for development sites. The Parish Council's response to our comments in the Consultation Statement states that although they do not want the policy to be too prescriptive, they also need to be precise and they consider that the wording of Policy C3 meets the soundness tests. We disagree with the Parish Council that providing flexibility within Policy C3 will result in the Policy not being 'precise'. As drafted, Policy C3 is negatively worded and is therefore contrary to paragraph 16 of the NPPF which states that plans should "*be prepared positively, in a way that is aspirational but deliverable*". The policy also does not support Core Strategy Policies H1 and H3 which state that the amount and mix of affordable and market dwellings on a site will vary depending on evidence of housing need and viability.

In order to meet basic condition d. (contributing to the achievement of sustainable development), we consider that Policy C3 should be amended to state that "*housing mix will be determined on a site by site basis and should be justified by the applicant*".

Policy C5

Our comments to the Draft NP requested that support should be given to enabling development in Policy C5. The Parish Council's response to our comments in the Consultation Statement states that a "substantial area of land" at Belmont Golf Course is allocated in the Belmont Rural NP as enabling development. An area of land is indeed allocated in the made Belmont Rural NP as enabling development. However, this land was allocated without discussion with my client and as we set out in representations to the Belmont Rural NP process, the land allocated is significantly constrained (as set out in the 'Site Context' section of this representation) and only circa 0.4ha of that land is developable. It is not considered that this area is sufficient in scale to be able to support the enabling development required to fund the renovation of Belmont House within our client's ownership. In 2008, Historic England (then 'English Heritage') wrote to our client to state that "*the financial scale of the problem (several millions) is such that it is unlikely that [England Heritage] could offer a grant of the size required*" therefore enabling development is required. We consider that it is necessary for additional land to be allocated in order to fund the renovation of Belmont House.

The Parish Council's response to our Draft NP comments also added that the loss of significance of the registered parkland when the relief road is built can only be assessed when detailed proposals are made. We acknowledge that further assessment of the impact of the relief road on the landscape and historic environment will be required once the preferred route is agreed. However, as we have set out in more detail in our response to Policy C11, we consider that the NP should be doing more to anticipate the opportunity that the proposed relief road will bring to the area.

Policy C11

In our response to the Draft NP, we requested that text be added to Policy C11 to support potential development around the proposed bypass. The Parish Council has responded to our comments by stating that the project is speculative at present so does not merit amending the policy as requested. Paragraph 22 of the NPPF states that plan periods of 15 or more years are encouraged as it allows for policies "*to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure*". We consider that the Parish Council should use their NP to make the most out of the relief road opportunity and should safeguard our client's land around the proposed relief road for potential future development. This will ensure that future growth in the parish is directed to the most sustainable location as the land is adjacent to Hereford and will ensure that the NP meets basic condition d.



I trust you find the above comments helpful and can be taken into consideration prior to submitting the NP for Examination. We wish to be kept informed on the progress of the NP.

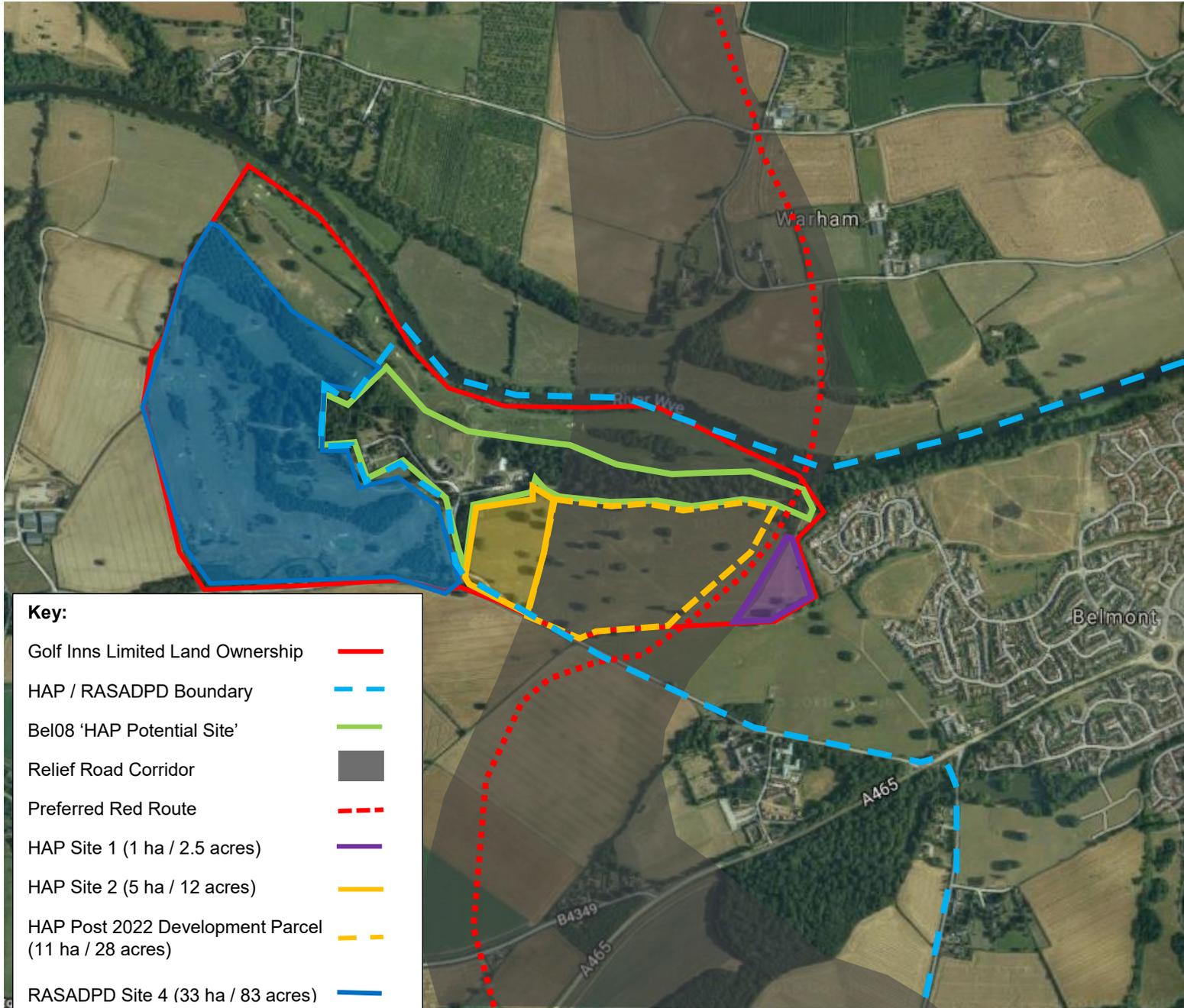
Yours sincerely

Jessica Graham
Senior Planner

Enc. Revised Potential Development Parcels Plan

Revised Potential Development Parcels Plan

Former Belmont Golf Course – February 2019



Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment

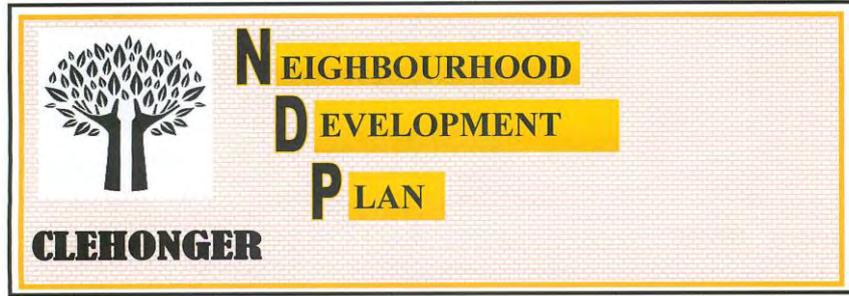
From Herefordshire Council Strategic Planning Team

Name of NDP: Clehonger- Regulation 16 submission draft

Date: 24/02/20

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
C1- Sustainable Development	SS1; SS4; H3; SC1; OS2; LD1	Y	
C2- Settlement Boundary for Clehonger	RA2; H1; H3	Y	
C3- Housing Mix	H3	Y	
C4- Natural Environment	SS6; LD1; LD2; LD3; SD3; SD4	Y	
C5- Historic Environment	SS6; LD4	Y	This issue is considered to be sufficiently covered in the same manner in the equivalent CS policy (LD4), making this policy's inclusion appear superfluous.
C6- Design	SS4; SS6; SS7; MT1; LD1; LD2; LD3; SD1	Y	Suggested minor wording adjustment for clarity: <i>Modern design approaches which take on <u>that are</u> innovative, approach, including <u>to particularly with regard to</u> energy efficiency and sustainability, will be welcomed...</i>
C7- Business and Tourism	SS1; RA5; RA6; E3; E4	Y	
C8- Agricultural Development	SS1; RA6; MT1; SD1	Y	

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
C9- Community Facilities	SC1	Y	
C10- Clehonger Playing Field	OS2; OS3	Y	
C11- Hereford Bypass	SS1; SS4; MT1; SC1; LD3	Y	



Clehonger Neighbourhood Development Plan 2011-2031

Submission draft



DJN Planning Limited · October 2019 · For Clehonger Parish Council

range of factors to be assessed in considering the design of new development. Policy C6 below supplements the strategic policies; it is intended to be applicable to all forms of development as relevant, with a particular emphasis on new housing proposals.

- 5.17 The creation of new accesses to serve development can have notable environmental impacts (Local Plan Core Strategy policy MT1 *Traffic management, highway safety and promoting active travel* deals with technical highway requirements). For example, achieving the required sightlines for new or improved junctions may lead to undue impacts on local character through the loss of roadside vegetation, with a general “opening up” of what may have been a relatively closed landscape setting. Proposals which cannot satisfactorily mitigate such environmental impacts will not be supported.

Policy C6: Design

Development proposals should maintain and enhance the local distinctiveness of Clehonger Neighbourhood Area and achieve a high quality of design by:

- 1. respecting and positively responding to the character of adjoining development, settlement form and the wider landscape, having regard to siting, scale, height, massing, detailing, materials and means of enclosure; and**
- 2. incorporating sustainability measures to include building orientation and design, energy and water conservation, sustainable construction methods and materials, the generation of renewable energy, charging points for electric vehicles, and provision for the recycling of waste, cycle storage, communications and broadband technologies; and**
- 3. in the case of proposals for new housing, incorporating private amenity space and sufficient off-road parking for vehicles and cycles commensurate with the size and type of property; and**
- 4. being capable of being safely accessed from the local road network without undue local environmental impacts which cannot be mitigated. The arrangements for access should wherever practicable include provisions for pedestrians and cyclists to encourage active travel, and for powered disability vehicles; and**
- 5. avoiding creating unacceptable impacts on residential amenity and tranquillity from noise, volume and nature of traffic generated, light, dust or odour; and**
- 6. retaining and incorporating features of amenity and biodiversity value, such as mature trees, ponds and hedgerows, and incorporate new provision for wildlife; and**
- 7. providing for new tree planting and other landscaping which is in keeping with the prevailing landscape character, uses locally appropriate and native species, integrates new buildings in their surroundings, and supports green infrastructure and the Herefordshire Ecological Network.**

Modern design approaches which take an innovative approach, including to energy efficiency and sustainability, will be welcomed where they make a positive contribution to the character of the area and contribute to local distinctiveness.

Policy C7: Business and tourism

Development proposals to enable the creation or expansion of small and medium business enterprises will be supported provided that they are of a scale, type and nature appropriate to their location and setting and the impacts on highway safety and capacity are or can be made acceptable. This includes:

1. **the re-use of redundant rural buildings for business use and the provision of live/work units; and**
2. **the small-scale extension of existing business premises and commercial facilities; and**
3. **extensions to existing dwellings needed to enable home working; and**
4. **the development and diversification of farm, forestry and other land-based rural businesses; and**
5. **rural tourism, craft and leisure proposals, particularly those which sustain, enhance and promote a better understanding of the local natural, historic and cultural environment.**

Agricultural development

- 6.6 Changes in farming have seen pressures arise for larger-scale, industrial-sized developments in the countryside such as intensive livestock units and polytunnels. Permitted development rights for agriculture and forestry mean that only buildings above certain size thresholds require planning permission. Local Plan Core Strategy policy RA6 *Rural economy* provides that proposals to diversify the rural economy will be permitted provided that there are no undue impacts due to scale or on residential amenity, traffic safety and water quality.
- 6.7 Responses to the residents' survey placed more importance on traditional farming than intensive methods or industrial farm diversification. There were many comments supportive of farming and farm diversification including intensive production. Others were concerned about the possible implications for the local environment.
- 6.8 Larger-scale proposals may give rise to a range of possible impacts including on the landscape, the highway network and public rights of way. The following policy is intended to help ensure that new agricultural development is undertaken sensitively and with due regard to its implications.
- 6.9 Herefordshire Council has issued a Poly tunnels Planning Guide which provides a comprehensive assessment of the relevant issues and a set of guidelines.¹⁴ These guidelines will also be taken into account in deciding whether polytunnel proposals requiring planning permission are to be supported.

¹⁴ https://www.herefordshire.gov.uk/download/downloads/id/14577/polytunnels_planning_guide_2018.pdf

Policy C8 Agricultural development

Proposals for agricultural development requiring planning permission, for example intensive livestock units, polytunnels or horticulture, should be able to demonstrate that they meet the following requirements. Any other existing, permitted or proposed similar developments in the locality should be taken into account so that cumulative impacts can be considered:

1. **the local highway network and the proposed means of vehicular access can cater adequately for both the volume and type of vehicles anticipated, and the proposed access is environmentally acceptable; and**
2. the impacts on landscape character and visual amenity are acceptable, or are capable of being satisfactorily mitigated by a landscaping scheme which is itself acceptable; and
3. there will be no undue loss of amenity to the occupiers of residential properties, including by way of external lighting, the design and siting of any installation, or odour, noise and air pollution; and
4. there are no unacceptable impacts on the natural and historic environments, in accordance with policies C4 and C5; and
5. sustainable drainage proposals are included to acceptably manage surface water and avoid risk of pollution and soil erosion; and
6. there are no unacceptable impacts on the utility and enjoyment of public rights of way.

Community facilities

6.10 Local community facilities are important in meeting the current and future needs of residents. They comprise:

- Clehonger Village Hall
- Clehonger playing field
- Innesfield Community Centre
- All Saints Church
- Belmont Abbey Church of St Michael and All Saints
- Clehonger Primary School and Little Gems Pre-School
- Clehonger Village Stores and Post Office
- The Seven Stars public house.

6.11 Replies to the residents' survey confirmed the importance placed on retaining local community facilities. Overall, 85% of residents saw protection of community assets as important or very important in conserving or improving the built environment. Continued improvement of the village hall and the playing field (see below) was supported by at least 75% of residents; and 88% thought that having and retaining a village school was important or very important to quality of life.

Latham, James

From: Turner, Andrew
Sent: 03 March 2020 14:09
To: Neighbourhood Planning Team
Subject: RE: Clehonger Regulation 16 submission neighbourhood development plan consultation

RE: Clehonger Regulation 16 submission neighbourhood development plan

Dear Neighbourhood Planning Team,

Apologies for the delay in my response. 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.

- Given that no other specific sites have been identified in the plan I am unable to provide comment with regard to potential contamination.

General comments:

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

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

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

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

Kind regards

Andrew

Andrew Turner
Technical Officer (Air, Land & Water Protection)
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From: Neighbourhood Planning Team <neighbourhoodplanning@herefordshire.gov.uk>
Sent: 24 February 2020 09:40
Subject: FW: Clehonger Regulation 16 submission neighbourhood development plan consultation

Dear Consultee,

Clehonger 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/3044/clehonger_neighbourhood_development_plan

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

If you have any comments, could these be sent to the Neighbourhood Planning team by Monday 2 March at the latest.

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

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

Kind regards

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

Our Ref: DB/DB/6919

6th February 2020

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Herefordshire Council
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HR1 2ZB

**Cleghonger Neighbourhood Development Plan: Regulation 16 draft plan – public
consultation representation**

1.0 Introduction

This representation is made on behalf of Mr G Lewis who owns land of 0.26 Ha adjacent Garnom, Poplar Road (U73412) Cleghonger, at the south eastern edge of the village settlement which is currently the subject of a current planning application ref 200299 relating to residential development of two dwellinghouses.

The following should be read in conjunction with the representation made by the landowner during the Regulation 14 draft plan consultation period and subsequently recorded within the Consultation Statement prepared by DJN Planning Limited dated October 2019.

The above planning application proposals formed the basis of a formal pre planning application consultation request application in July 2019 and the Council's detailed response acknowledged that the site location at the south eastern edge of the village settlement adjacent existing dwellings and with dwellings located immediately opposite is considered to be adjacent to the main built up part of Cleghonger. And as such the location of the site is considered to be acceptable in principle for additional residential development.

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2.0 Clehonger Neighbourhood Development Plan: Regulation 16 Draft Plan

2.01 The following comments relate to the Regulation 16 stage draft NDP insofar as its housing policies only are concerned and in the context of the current parallel planning application ref 200299 relating to residential development of two dwellinghouses on land adjacent to Garnom, Poplar Road, Clehonger is concerned.

2.02 The current draft NDP references at paragraph 4.1 that it implements Herefordshire's Core Strategy (CS) by defining an appropriate settlement boundary together with land for new housing, reflecting the requirement for planned housing growth within Clehonger during the plan period to 2031.

2.03 CS Policy RA2 '*Housing in settlements outside Hereford and the market towns*' : states in 1.) that housing proposals will be permitted where their design and layout reflects the size, role and function of each settlement and be located within or adjacent to the main built up area. This specific wording is mirrored in CS Policy RA1 para 4.8.16, which additionally adds that '*this will ensure that unnecessary isolated, non- characteristic and discordant dwellings do not arise which would adversely affect the character and setting of a settlement and its local environment*'.

2.04 The site of the proposed residential development currently the subject of planning application on land adjacent Garnom, Poplar Road Clehonger ref 200299 adjoins the currently defined settlement boundary within Regulation 16 draft NDP and is located immediately adjacent the main built up area of the settlement. The location is acknowledged by Herefordshire Council to be an appropriate sustainable location for residential development, entirely in accordance with the policies of the CS.

2.05 The National Planning Policy Framework (NPPF) or 'Framework' sets out the Government's planning policies for England and how these should be applied. At paragraph 29 the framework states that neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies. Footnote 16 to paragraph 29 states that '*Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area*'.

2.07 The draft NDP Policy C2 defines the Clehonger development boundary within Plan 4 Clehonger Village Policies Map. This policy states that only '*proposals for housing within the settlement boundary will be supported where they are in accordance with policy C6 on design....*' Paragraph 4.10 specifically states that land immediately abutting the settlement boundary is considered to be 'open countryside'. In countryside locations residential development is limited to exceptional circumstances so as to avoid unsustainable patterns of development.

2.08 NDP Policy C2 does not therefore directly correspond with CS Policy RA2.1), in that it doesn't similarly support development '*within or adjacent the main built up area*' of a settlement. CS policies relating to provision of new housing form strategic policies for the County of Herefordshire and as such NDP Policy C2 cannot be considered to be in full conformity with the strategic policies of the CS as required by NPPF paragraph 29 and footnote 16.

2.09 The Clehonger draft NDP details planned housing growth of 226 new dwellings within the plan period to 2031, comprising 59 dwellings already completed between 2011 – April 2019, a further 152 with extant planning permissions, together with a windfall allowance of 15. The Herefordshire Local Plan Core Strategy requires Clehonger to make provision

for a minimum of 109 new dwellings within the plan period to 2031, whilst emphasising that there is no upper limit. The draft NDP does not identify or allocate any specific land to accommodate future housing growth within the settlement, essentially assuming that minimum new housing provision will be achieved by existing housing completions, planning permissions granted but yet to be built, together with a few as yet undefined windfall sites.

3.0 Conclusions

3.01 The above raises doubt as to complete conformity of the draft NDP with all of the strategic policies of the adopted CS development plan for Herefordshire.

3.02 The site adjacent Garnom, Poplar Road, Clehonger is demonstrably a sustainable location, well related to the pattern of existing residential development in the village and in relative proximity to the services / facilities that Clehonger provides. The current planning application proposals reflect an appropriate mix of house types and sizes to meet local needs and of entirely appropriate design for its setting. These proposals have been supported conditionally by the Council and well progressed as a formal full planning application, supported in principle by officers of the Council.

3.03 Subject to the current planning application being determined positively during Spring 2020 (as currently envisaged) the site will become immediately available for development, contributing towards meeting Clehonger's minimum housing commitment during the plan period to 2031.

3.04 Insofar as the Clehonger NDP process to date is concerned, this site appears to have been discounted solely on the basis that the landowner omitted to formally promote it within the original call for sites exercise undertaken for inclusion within the emerging draft plan.

3.05 We again commend the proposed development of land adjacent Garnom, Poplar Road Clehonger (the subject of current planning application ref 200299 for residential development of two dwellinghouses) for inclusion within Clehonger's NDP and urge realignment of the proposed village settlement boundary to embrace this site.

3.06 The land forms an entirely logical further extension of residential development to the south eastern edge of the Clehonger settlement and subject to receiving planning permission during 2020 available immediately to contribute towards meeting Clehonger's future housing growth within the plan period.

David Baume BA (Hons) Dip Arch MRTPI RIBA
Director
Hook Mason Consulting

