

Colwall NDP Regulation 16 Comments

Comments made by: Andrew Banks (Development Manager – North Team) and Josh Bailey (Senior Planning Officer – North Team)

General Comment

- As a general comment, it was felt that a contents page for policies would aid officers to find policies.
- It was also suggested that a good example of this can be found at the end of the Cradley NDP, which sets aside a couple of pages and lists each policy individually.

Policy CSB1 – Colwall Settlement Boundary

- Officers felt that if you decide to define a settlement boundary, then it should be somewhat reasonable to build to the settlement boundary, albeit within. Confusion was raised given that the last sentence of this particular policy seems to conflict with that of the first part of the policy.
- It was noted that the settlement boundary seems to exclude 'Mill Lane', to which it is understood that there is a current application in for this site.
- Questions as to whether there are there any realistic development opportunities at Orlin Road. If not, officers question as to why is it being included as part of the settlement boundary, and whether realistically, this should be omitted.

Policy CD1 – Protecting Exceptional Key Views

- Whilst acknowledging the sensitivity of the Malvern Hills AONB, it seems somewhat far-fetched/excessive for a LVIA to be undertaken for minor residential development (i.e. 1/2/3 new dwellings).
- Officers feel that the level of information really should be proportionate to the type of application proposed.
- A suggestion to re-word the policy in that – 'development proposals will need to consider the landscape impacts and level of information is proportionate to development proposed'.
- The way the policy works, seems like the whole village would need an LVIA?
- Suggestion to simplify the map attached to this policy. Officers encourage to have a look at Wellington Heath viewpoints and ridgelines policy (WH14) – which actually directs where the viewpoints are identified.

Policy CD2 – General Design Principles for Development within Colwall Settlement Boundary

- It is suggested to split up this policy, as it is, to put it simply, too much detail. It is suggested that it can be broken up into individual policies, e.g. one for new residential development; one for householders; one for heritage assets – generally it would be much easier and 5 or 6 policies can be made out of this one policy.
- In relation to point 21. It is queried as to the use of steel as a material
- In regards to point 23. settlement pattern should really apply to the conservation area and perhaps reference should be made to the recent dismissed appeal at Mathon Road, particularly given Colwall settlement, as a whole, has a variety of different settlement patterns, particularly when you compare the conservation area and development immediately adjacent. May be worth including this point as part of conservation area and built environment.

- Point 26 can be a separate policy
- Less is more in truth.

Policy CD3 – Site 1 Former Primary School and adjacent land (approximately 9 houses)

- Officers felt on first impression that it does seem somewhat restrictive to limit where built development will take place, as the site plot is not dissimilar to Elms Drive above, which only has 5 houses and a completely different pattern of development on another part of the site. A proposed layout is likely to look completely out of context. Doesn't seem hugely sensitive.
- Indeed, when you viewed the indicative layout at the appendix, it seems confusing when you read the policy. Namely, it says 9 in the policy but 14 dwellings are shown on the indicative layout. If so, is affordable housing to be sought after?
- Officers felt that points 2 thru 6 inclusive seemed to say the same thing.
- At point 7 officers queries as to how good design can really be achieved, if development is being restricted, likely to end up as out-of-context or character.

Policy CD4 – Grovesend Farm (approximately 37 houses)

- Officers have no comments to offer on this particular policy and felt it would defer to officers in the Majors team to offer any input on this.

Policy CD5 – General Design Principles for Development in the Wider Countryside

- A positive was felt that principle of development was comprehensively clear with outside the settlement boundary being immediately RA3/RA4/RA5/RA6.
- As a point of caution, at point B(12), it should be made clear that cabling is beyond the remit of planning and is permitted development.

Policy CD6 - Farmsteads

- Officers wish to make clear that a right to a view is not a material planning consideration.
- If the policy is to do with conversion as a whole, then this is appropriate, but a conflict would ensue if a farmstead is continued to be used as farmstead. For example, a new agricultural building next to the farmstead, would not conflict with policy, but queried about the continued viability of farmstead.
- Clearly, a question would be raised if conflict would take place with the NDP on siting because it's adjacent to the farmstead, but also alternative siting is isolated and remote, raising concerns also.

Policy CD7 – Protecting Archaeology

- No comments to make

Policy CD8 – New Agricultural Buildings

- Firstly, officers felt to draw attention to policy CD6, which needs clarification on point 2, particularly the appropriate location of farm buildings.
- Point 4 and 5 raises a question as to what is the operational need of the farmstead? This seems unnecessarily limited in terms of scope.
- An agricultural building is a simple rectangular form, compromising use by features.

- Officers felt that this policy is unduly restrictive and needs a comprehensive review. Its aims in reality are unrealistic.

Policy CD9 – Poly-tunnels

- No comments to offer

Policy CH1 – Range and Mix of Housing

- No comments to offer on this policy

Policy CF1 Supporting A Range of Goods and Services in the Village Centre

- Officers felt that the policy needs the inclusion of appropriate marketing for at least a continuous period of 12 months as a minimum, particularly in relation to community and social facilities such as public houses and the village shop, in line with supporting background information to Policy SC1 of Herefordshire Council's Core Strategy.

Policy CF2 Recreation Facilities and Open Spaces

- No comments to make

Policy CF3 Local Green Space

- No comments to make

Policy CRE1 - Renewable Energy Schemes

- Officers noted that no mention of biomass proposals or ground source heat pumps has been made, bearing in mind that the Neighbourhood Area has received certain application types within recent times e.g. Barton Court.

Other comments by officers

- Officers felt that some aspects of planning were not evident within the NDP and thoughts should be given to potentially including these aspects. This encompassed:
 - Tourism – particularly given Colwall's relation to the Malvern Hills AONB
 - Rural Economy – for the same reason as above
 - Full Householders policy – many NDP tend to focus predominately towards residential development when 70/75% of applications are full householder applications.
- Officers noted the potential of a new highways policy, which was located in appendix 1, and cannot be considered as a policy in its current location. It was suggested that this could be a policy on its own.
- As a matter of closing, Policy CD2 needs to be split up clearly into residential/full householder applications.

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 27 March 2020 19:56
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Andrew
Last name	Downs
Which plan are you commenting on?	Colwall Neighbourhood Development Plan
Comment type	Objection
Your comments	<p>I would like to register my objection to the Colwall 2020 NDP. The plan seems to have taken decisions that don't reflect the views of villagers, nor result in a plan that is best for the village. The proposal of Grovesend Farm for development would put more traffic on roads that are not suited such as a narrow road in Old Church Road and Stone Drive which already has many parked cars and awkward junctions. The proposal does not identify a separate pedestrian access where there is currently none to the site. The plan to have a new school and housing off Mill Lane in 2015 had broad support. That site has many benefits, including not being part of the Colwall Conservation Area, which Grovesend Field is an important part of. There is also far better vehicular and pedestrian access, with links directly to existing footpaths towards the village. The unexpected change of land allocation in 2018 was not broadly supported, and comments in the subsequent consultation seem to have been ignored before this submission.</p>

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 26 March 2020 15:09
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Anne
Last name	Easthope
Which plan are you commenting on?	Grovesend Field
Comment type	Objection
Your comments	This proposed development at Grovesend Field is not the right place for building purposes. The surrounding roads are very narrow with no pavements in Old Church Road thereby making it extremely dangerous for pedestrians and virtually impossible to access. Please rethink this proposal and transfer it to the site in Mill Lane which is a much safer and sustainable option.

Latham, James

From: Andrzej Kowal
Sent: 27 March 2020 21:06
To: Neighbourhood Planning Team
Subject: Colwall 2020 NDP

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.

I object to the 2020 version of the Colwall NDP as I believe the Grovesend Farm as being a part of the Colwall Conversation Area should be protected at any cost.

The original plan to build off Mill Lane was by far more accepted by the people from the village than Grovesend Farm which now seems to be simply ignored.

Building on Grovesend Farm will mean that the Old Church Road and Stone Drive both will result in greater traffic which is unsafe because of the narrow and parked-up roads. Unfortunately the new plan does not give you any reassurance whatsoever that there will be a safe pedestrian link to Grovesend field. Right now when I leave my own house I have to cross the street to get to the pedestrian walkway just before a sharp bend. If the traffic on Stone Drive will be impacted by the Newley build site which it will be this means less safety for my family in the upcoming future.

Best regards,

Andrzej Kowal

Latham, James

From: Martin
Sent: 18 March 2020 18:21
To: Neighbourhood Planning Team
Subject: Colwall Neighbourhood Development Plan - Grovesend Field

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 Sirs,

Having studied the above plan I wish to make an objection to the current consideration to develop Grovesend Field for housing.

This site is totally unsuitable from a number of viewpoints - from pedestrian safety with no pavement facility on what would be the very narrow traffic outlet of Old Church Road, and also from the impact of increased traffic in the narrow lanes of the immediate surrounding area – Stone Drive, Oak Drive and Old Church Road.

Of particular concern should be the awkward junctions of Old Church Road/ Mathon Road, and Old Church Road/Walwyn Road. The latter now being already seriously congested by the large amount of cars, coaches, mini busses etc., using this junction, on a daily basis, to service the increasing intake at the The Downs School in Brockhill Road.

I do not see the reasoning behind the selection of Grovesend Field, rather than the alternative development considered at Mill Lane, which offers a much safer option for pedestrians, a good, clear and direct vehicle exit to the main road and provides close access to the main village amenities- school, village hall, shops, station etc.

I believe the overall impact of the incorrect sighting selection of this development will not benefit the existing village community, but will result in animosity, and dismay of residents, who do not feel they are being listened to but are fully aware of the impact the Grovesend development will inflict.

Regards
Alan Martin

Sent from [Mail](#) for Windows 10

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 27 March 2020 12:59
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Andy
Last name	Meany
Which plan are you commenting on?	Colwall Neighbourhood Development Plan
Comment type	Comment
Your comments	Please add Mill Lane site to the plan instead of Grovesend Field. The Mill lane site has previously been well supported (2015) when the new school was being approved. The Mill lane site has much safer access and egress especially for pedestrians but also for vehicles. Grovesend Field would add considerable pedestrian and vehicle traffic during and post construction along Old Church Rd which even now is inadequately and only intermittently paved with a narrow road width for vehicles. Thank you for your consideration

20 March 2020

Regulation 16 Colwall NDP Response

Dear Sir/Madam,

I wish to make clear my objections to the Colwall NDP in its current form as submitted for Regulation 16.

- * The current draft includes development of Grovesend Farm for 37 Houses. The 2012 SHLAA concluded that this site was unsuitable since the road network would not sustain intensification of use.
- * The draft plan also prevents building on the land adjacent to the new school in Mill Lane, a site well supported by villagers in the only full consultation with 82 voting in favour of this site for both the school and housing development. It is unclear as to why this prevention has occurred.
- * A developer has submitted an application to build in Mill Lane, but despite the wishes of the community to use this site, this is being opposed by Parish Council on the grounds that it is not in the NDP. NDP's can be changed at this stage.
- * Both sites are within an area of outstanding beauty and both can be seen clearly from the top of the Malvern Hills. The significant difference is that Grovesend Farm is designated both as Conservation Land, and a "Green Lung" for the village. HCC have acknowledged that Conservation Land should be given protection and therefore given more weight in regard to landscape value.
- * Grovesend Farm is of historical importance to Colwall with the remains of industrial heritage, and also bordered by listed buildings.
- * The poor access to Grovesend Farm and the narrow Old Church Road with no footpaths is contrasted with the excellent access and footpaths for the Mill Lane site.

Conclusion

My objections are concerned with the way in which housing sites have been allocated without proper consultation and contrary to the wishes of the community, and the identification of Grovesend Farm as a housing allocation when a far more appropriate site should be available. I wish to support changing the current Colwall NDP to include building on the land adjacent to the new school in Mill Lane, and the removal of the building allocation on Conservation Land at Grovesend Farm.

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 22 March 2020 11:59
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Ann
Last name	Roberson
Which plan are you commenting on?	Colwall
Comment type	Objection
Your comments	<p>I do not support the currently proposed NDP because the site proposed for 37 of the additional houses is Grovesend Farm. Instead, the Mill Lane site (for instance) adjacent to the Colwall C of E School would be far more suitable. My reasons are: 1. Grovesend Farm is in a Conservation Area (one of only a few in Herefordshire), and therefore we must care for and protect it. It also has historical importance with industrial heritage on one side and listed buildings on another. 2. Grovesend Farm is also unsuitable because it has very poor road (and pedestrian) access – the road network giving access to the site from the main Walwyn Road runs through narrow twisty roads with poor visibility and there would be serious safety concerns. 3. Unlike Grovesend, the Mill Lane site provides a much safer option, and much more convenient solution for young families with easy access to school and hall, and also better for older people with easy access to all the community activity associated with the Village Hall. 4. The Mill Lane site has far better and safe pedestrian access to all village facilities via the new paths created for the school, and vehicular access off the upgraded Mill Lane. 5. These views were reflected in the past in both the 2012 SHLAA and in the 2015 version of the Colwall NDP.</p>

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 15 March 2020 12:47
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Alan
Last name	Seddon
Which plan are you commenting on?	Colwall Neighbourhood Plan
Comment type	Objection
Your comments	<p>The plan currently envisages the development of houses on Grovesend Field. This area is of major significance in the history of Colwall especially during the industrial revolution . Building on it would destroy the matters which need conservation rather than preserving them. In addition I fail to see how traffic could safely access this site as Church Road is narrow and largely without pavements. It is already somewhat hazardous to walk or drive down but is acceptable due to the Lanes current limited use by traffic. Any increase in traffic would render it dangerous and prevent it from being a public asset as it is a popular walk and also the major pedestrian access to the Village Allotments and Village Garden which contains the Village orchards. Surely we should be encouraging walking and exercise rather than forcing people to use cars or preventing access to amenities. A better solution would be to continue the develop the area around Mill Lane with the now splendid access to the school and village hall. This will better balance the village as over the years the Colwall Green end of the village has lost its services which would regenerate with more new property development.</p>

Dear Neighbourhood Planning Team,

Please find my individual commentary regarding the request for feedback on the latest draft of the Colwall NDP.

Whilst I am agreement with the concept of having an NDP and the need to meet the minimum housing growth targets – as we are in a protected AONB, I am objecting to the current recommendations of the latest draft plan.

In particular I do not believe the process in the selection of sites for housing development reflects the strength of evidence and majority of consultation respondent feedback is not reflected in the draft plan.

I have followed and supported the preferred process of attending and listening to plan authors and contributors and provided appropriate evidence, feedback and challenge in a timely fashion and when requested through the various development stages since 2013.

However, I have been frustrated that my comments and those of the majority of respondents has not been considered and acted upon during these consultation process and stages.

So I would like to formally challenge the current NDP process and design finalisation recommendations in a number of areas:

- I do not believe the LSCA has been developed consistently and it should not be the only consideration in determining sites for Housing development. It has also changed over time without detailed explanation or in consultation with village residents. As a consequence Grovesend Field is included as a site for development in the latest plan even though it was excluded in earlier versions and the Mill Lane site area which was considered suitable for development in earlier plans has now has been excluded.
- A recent application for appropriate development on Mill Lane has been very strongly supported by a clear majority of village respondents – yet the Parish Council have rejected the application and excluded it as an option in the NDP. This happened even though a well constructed and appropriately designed proposal was formally submitted before the draft NDP was finalised and within 2days of the Draft NDP being formally shared at the Colwall Village Hall.
- Other key studies and documents such as Herefordshire Council's own SHLAA recommendations and the English Heritage confirmation of the Colwall Conservation Area which highlighted Grovesend Field as a protected open space and the 'green lung' of the village do not seem to have been given the same consideration.
- No landscape impact assessment has been completed for the Grovesend field development
- In all village NDP discussion meetings and feedback the vast majority of respondents have provided feedback regarding the importance of highways, access and infrastructure in choosing sites for development. This does not seem to be considered in the draft plan recommendations with particular regard to the lack of suitability of Old Church Road to support future development
- The draft plan does not offer alternative housing development options and sites for the village residents to provide feedback on and ultimately vote upon. During the process there have always been options available including
 - A. The Mill Lane site, location near to services and highways links has much greater suitability for potential development

- B. A higher assumption on infill development. Recent average new house infill developments have been significantly higher than the projected average included in the plan. These developments are spread across the village and with appropriate planning could ensure diverse development and less pressure on particular locations and roads of bigger housing developments. A number of these 1 or few house development applications have been rejected by the PC when they could have contributed to the Plans housing targets.

Both sites are fields within the AONB, and both are clearly visible from the Malvern Hills. However:

- Grovesend Field is within the Colwall Conservation Area and should be awarded greater protection;
- Grovesend Field is of historical importance to Colwall with the remains of Colwall's industrial heritage in the southern section and is bordered by listed buildings to the north;
- Grovesend Field has poor access, meaning increased traffic will impact on Stone Drive, Old Church Road, Oak Drive, and the awkward junctions with Mathon Road and Walwyn Road. Old Church Road is narrow and lacks a pavement, making future residents of any development less likely to walk to the village, and the ongoing safety of current pedestrian users is also a concern.
- The Mill Lane site provides a safer and more sustainable option, with excellent pedestrian access to key amenities including the school, village hall, scout hut, village shops and public transport on Walwyn Road / the station. Any vehicle traffic accesses Walwyn Road directly, via a well designed junction with excellent sight lines.

I would be very happy to provide any additional info on request

Regards

Mrs Arielle Stephens

Latham, James

From: Turner, Andrew
Sent: 18 February 2020 15:51
To: Neighbourhood Planning Team
Subject: RE: Colwall Regulation 16 submission neighbourhood development plan consultation

RE: Colwall Regulation 16 submission neighbourhood development plan consultation

Dear Neighbourhood Planning Team,

I refer to the above and would make the following comments with regard to the proposed development areas identified in the 'Colwall Regulation 16 submission neighbourhood development plan':

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

Having reviewed Ordnance survey historical plans, I would advise the following regarding the two sites (Policy CD3 Site 1 and Policy CD4 Site 2 indicated in yellow on map 5) that have been proposed for housing development:

Policy CD3 Site 1 Former Primary School and Adjacent Land (Target - approximately 9 houses)

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

Policy CD4 Site 2 Grovesend Farm (Approximately 37 houses)

- A review of Ordnance survey historical plans indicate the western section of the site has historically been used as an orchard and the majority of the site has historically been used as a farm and therefore potentially subject to a variety of agricultural practices.

By way of general advice I would mention that orchards can be subject to agricultural spraying practices which may, in some circumstances, lead to a legacy of contamination. Agricultural practices such as uncontrolled burial of wastes or excessive pesticide or herbicide application may be thought of as potentially contaminative. Any development should consider both the above former uses.

- Ordnance survey historical plans also indicate that a tramline (a historic potentially contaminative use) ran along the southern site boundary. The site's potentially contaminative use would therefore require consideration prior to any development.

Any future redevelopment of the site would be considered by the Planning Services Division of the Council however, if consulted it is likely this division would recommend any application that is submitted should include, as a minimum, a 'desk top study' considering risk from contamination in accordance with BS10175:2011 so that the proposal can be fully considered. With adequate information it is likely a condition would be recommended such as that included below:

1. No development shall take place until the following has been submitted to and approved in writing by the local planning authority:

- a) a 'desk study' report including previous site and adjacent site uses, potential contaminants arising from those uses, possible sources, pathways, and receptors, a conceptual model and a risk assessment in accordance with current best practice
- b) if the risk assessment in (a) confirms the possibility of a significant pollutant linkage(s), a site investigation should be undertaken to characterise fully the nature and extent and severity of contamination, incorporating a conceptual model of all the potential pollutant linkages and an assessment of risk to identified receptors
- c) if the risk assessment in (b) identifies unacceptable risk(s) a detailed scheme specifying remedial works and measures necessary to avoid risk from contaminants/or gases when the site is developed. The Remediation Scheme shall include consideration of and proposals to deal with situations where, during works on site, contamination is encountered which has not previously been identified. Any further contamination encountered shall be fully assessed and an appropriate remediation scheme submitted to the local planning authority for written approval.

Reason: In the interests of human health and to ensure that the proposed development will not cause pollution to controlled waters or the wider environment.

2. The Remediation Scheme, as approved pursuant to condition no. (1) above, shall be fully implemented before the development is first occupied. On completion of the remediation scheme the developer shall provide a validation report to confirm that all works were completed in accordance with the agreed details, which must be submitted before the development is first occupied. Any variation to the scheme including the validation reporting shall be agreed in writing with the Local Planning Authority in advance of works being undertaken.

Reason: In the interests of human health and to ensure that the proposed development will not cause pollution to controlled waters or the wider environment.

3. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted, and obtained written approval from the local planning authority for, an amendment to the Method Statement detailing how this unsuspected contamination shall be dealt with.

Reason: In the interests of human health and to ensure that the proposed development will not cause pollution to controlled waters or the wider environment.

Technical notes about the condition

1. I would also mention that the assessment is required to be undertaken in accordance with good practice guidance and needs to be carried out by a suitably competent person as defined within the National Planning Policy Framework 2012.
2. And as a final technical point, we require all investigations of potentially contaminated sites to undertake asbestos sampling and analysis as a matter of routine and this should be included with any submission.

General comments:

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

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

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

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

Kind regards

Andrew

Herefordshire.gov.uk

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

Direct Tel: 01432 260159
Email: aturner@herefordshire.gov.uk



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From: Neighbourhood Planning Team <neighbourhoodplanning@herefordshire.gov.uk>
Sent: 14 February 2020 10:44
Subject: Colwall Regulation 16 submission neighbourhood development plan consultation

Dear Consultee,

Colwall 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/3046/colwall_neighbourhood_development_plan

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

The consultation runs from 14 February 2020 to 27 March 2020.

31 MAR 2020

To
Ack'd

Colwall Neighbourhood Development Plan (NDP) Herefordshire Council wants your input

The Council are currently considering the draft Colwall NDP, and value any ideas that you may have to improve it. **YOU CAN SAVE GROVESEND FIELD** from being built on in the future by responding to their consultation with your thoughts as a resident of the village.

The current draft plan includes the development of Grovesend Field, off Old Church Road, potentially allowing 37 houses to be built (this would be subject to any future planning application and more could be proposed by a developer).

The draft plan also prevents building on the land by the school in Mill Lane (which was an option well-supported by villagers in the past, and a site that offers very similar capacity and already has a well-considered planning application submitted by a local developer).

Both sites are fields within the AONB, and both are clearly visible from the Malvern Hills. However:

- Grovesend Field is within the Colwall Conservation Area and should be awarded greater protection;
- Grovesend Field is of historical importance to Colwall with the remains of Colwall's industrial heritage in the southern section and is bordered by listed buildings to the north;
- Grovesend Field has poor access, meaning increased traffic will impact on Stone Drive, Old Church Road, Oak Drive, and the awkward junctions with Mathon Road and Walwyn Road. Old Church Road is narrow and lacks a pavement, making future residents of any development less likely to walk to the village, and the ongoing safety of current pedestrian users is also a concern.
- The Mill Lane site provides a safer and more sustainable option, with excellent pedestrian access to key amenities including the school, village hall, scout hut, village shops and public transport on Walwyn Road / the station. Any vehicle traffic accesses Walwyn Road directly, via a well designed junction with excellent sight lines.

You can help to preserve Grovesend Field by:

- Writing to: Neighbourhood Planning Team, Planning Services, PO Box 4, Hereford HR1 2ZB
- E-mailing: neighbourhoodplanning@herefordshire.gov.uk
- Responding online:
https://www.herefordshire.gov.uk/directory_record/3046/colwall_neighbourhood_development_plan

It is a straightforward process to amend the NDP to include the site by the school in Mill Lane and remove Grovesend Field. The villagers voted overwhelmingly for this when consulted in 2014. Make sure your voice is heard.....

The deadline for feedback and suggesting changes is **Friday 27th March 2020.**

Preserve Grovesend Field.

19-3-20

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 17 March 2020 14:19
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Brian
Last name	Ballard
Which plan are you commenting on?	colwall
Comment type	Objection
Your comments	<p>Now there is a planning application on the table for the Mill Lane site, I believe that the Grovesend site should be deleted from the plan and Mill lane substituted. The plan to have a school and housing at Mill lane was popular with the village when the question was asked prior to the school being built. The exclusion of the Mill lane site and inclusion of the Grovesend site, with it's problems of access, was a surprise to many in the village. In the Jan 2018 landscape assessment the ratings for both sites (9 and 12A) in all sectors was identical Landscape Sensitivity: High to Moderate Visual Sensitivity: High to Moderate Overall Sensitivity: High to Moderate Landscape Value: High to Moderate Yet the Mill lane site overall sensitivity was set to "High" (vs the Grovesend Site "Moderate") for no apparent reason. Likewise the Overall capacity of the Mill lane site was reduced for the slightly arbitrary reason of "linking low capacity areas 11 and 8 and to reinforce the belt along the W side of the village". This seems a very flimsy argument when set against the feelings of the village. If the village plan is to represent how the residents wish the village to develop then it seems strange to override them because of a single point in an assessment paper. If the views of the residents are to be secondary to the views of outside consultants then the</p>

village plan is merely a fig leaf to give the appearance of local consent.

25th March 2020

Re: Colwall Neighbourhood Development Plan

To the Neighbourhood Planning Office

I am writing regarding a suggested alteration to the Neighbourhood Development Plan in Colwall. Two days ago I received, through my letter box, a letter suggesting how I may 'Save Grovesend Field'. I am writing as a Colwall resident concerned that the alternative site in Mill Lane might be adopted. I fully understand that Colwall needs to share in the national need for more housing and that Colwall, which is well served as a village has amenities, such as shops, pharmacies, schools, a railway station and a bus route. I am however very surprised that the agreed site of Grovesend Field may now be in question, and was surprised that the only way I heard was an unofficial letter put through my letter box.

Mill Lane, like Old Church Road is also a country Lane. The increasing weight of traffic on a narrow lane is already causing great damage to the verges and the road surface. Mill Lane is a main route through from Colwall to Bosbury and beyond. It is the main vehicular commuter route from Colwall to Leominster and Bromyard. Not to mention the high volume of traffic which use to the lane to access Colwall, its station and the two Independent Prep Schools. Had we not been in this unusual situation of Coronavirus, I would have been able to take photographs showing how busy the lane currently is, not just with cars and agricultural traffic, but also large lorries, including articulated lorries which pass through on a daily basis.

Most importantly, there are significant safety issues. The junction of Mill Lane to Walwyn Road is very busy, particularly at school times. With the traffic lights at the bridge, many parents accessing the Elms school, park Mill Lane side and walk their children over the bridge and then return turning in the entrance to Mill Lane. Cars are often parked in Stowe Lane for both schools, and often people stop and park opposite the T-junction to Mill Lane creating dangerous driving conditions, particularly when there are so many young children about. A further consideration is that there is no pavement beyond, school side, beyond the vehicular exit of the village hall, which already creates a significant risk to safety.

The suggestion that approximately 40 houses could be built next to the school could only increase an already unsatisfactory situation. If only half the homes had only 2 cars that would be an increase of 60 vehicles. It has been suggested how ideal the site is for access to the school, as well as the village amenities, but it is a longer walk to the village shops from Mill Lane than Grovesend, which will again mean increased traffic.

I would be grateful to hear from you, what the proposed type of housing would be. If there is to be 70% affordable/social housing which would bring younger families into the village I could understand the greater need to be closer to the school, village Hall and Scout Hut. If the proposed plans are for higher end properties, each home would have an average of two cars. Would there be good provision for extra parking off Mill Lane for these houses as the Village Hall and School carparks are often filled with events at the Village Hall. I would also be keen to know what plans there are to ensure the conservation of the 'historical' site of Grovesend Field, or will the remains of the railway from the vinegar works vanish from sight soon anyway? Is there not a more suitable site within the village? I look forward to your response with my concerns.

Yours sincerely

Ben Cooper

Latham, James

From: pauline wood
Sent: 15 March 2020 11:29
To: Neighbourhood Planning Team
Subject: Grovesend Field Colwall

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.

How ridiculous proposing building houses on grovesend field Colwall. Such a narrow lane, no public transport, no pavement, no adequate drainage to cope with the runoff of storm water from 37 houses and roads draining to a small watercourse at the bottom of the site bordering bungalows on the Crescent which would almost certainly flood. It would be a development bitterly regretted if carried out, let's hope sanity prevails in this instance.

Bob and Pauline Wood

BRIAN RICHARDSON

Regulation 16 Colwall NDP Response.

18th March 2020

Dear Sir/Madam,

I wish to make you aware of the strong objections I have in regard to the Colwall NDP which has now been submitted for Regulation 16 Stage.

These objections can be considered in two parts:-

- 1 Concerns over the allocation of housing sites
- 2 The identification of Grovesend Farm as a housing allocation when a more suitable site is available.

I fully acknowledge and indeed support the necessity of an NDP for Colwall, but wish to challenge the NDP in its current form.

1 Allocation of Housing

It is evident that a U-turn was taken by Colwall Parish Council with regards to the allocation of housing sites as identified in the 2015 Draft NDP, and the subsequent 2018 Regulation 14 NDP, which has led to "Land adjacent to the Village Hall, Mill Lane" being removed as a potential housing site, and it being replaced by "Land at Grovesend Farm, Old Church Road."

The only full consultation with Villagers took place in 2015 concerning land to be allocated for a new school. The feedback was analysed by the Parish Council.

The land adjacent to the Village Hall, Mill Lane was strongly supported (82 to 8) for the school, whereas Grovesend Farm was strongly rejected. (56 against 6) *At this time, the land off Mill Lane had option for housing development as well as a school.* The question of housing development on Grovesend Farm was not put forward as an option for community consideration.

No further community consultation was undertaken until the Regulation 14 NDP was issued in 2018. This included a drastically revised LSCA (2018) which included fundamental changes to the capacity rating of sites including the land adjacent to the Village Hall, and for the first time, Grovesend Farm. The Village Hall site was now *removed* as a potential housing site despite the well supported proposal in the 2015 draft NDP where school plus housing had been the option given to the community.

It is my view that there has been a fundamental lack of community involvement during the preparation of Colwall's NDP. Presentations have been made, but no meaningful debate about the communities wishes. These wishes were clearly made clear to the Parish Council in 2015, but have been discounted with little valid justification for doing so.

“Making decisions based on sensitivity and capacity is a difficult and challenging area of work.....The terms themselves are difficult to define accurately in a way that would be widely accepted.” (Natural England Topic Paper 6.) Under para 3.4, the paper quotes, “ Conservation adds to landscape value.” There is no evidence that suggests this has been taken into account.

HCC policy in regard to conservation state, “ Once an area is designated, we are under a duty to prepare proposals to ensure the preservation and enhancement of the area.” Again, there is no evidence that the Parish Council have taken this into account.

A heavy dependance on the sole use of the LSCA without due consideration of other factors has led to inappropriate choice of land allocation for housing development.

2 The Identification of Grovesend Farm as a housing allocation site when a more suitable site is available.

The current NDP includes the development of Grovesend Farm, off Old Church Road, potentially allowing 37 houses to be built . The draft plan also prevents building on the land by the school in Mill Lane (which was an option well-supported by villagers in the past, and a site that offers very similar capacity.

Both sites are fields within the AONB, and both are clearly visible from the Malvern Hills. However:

- Grovesend Farm is within the Colwall Conservation Area and should be awarded greater protection;

- Grovesend Field is of historical importance to Colwall with the remains of Colwall's industrial heritage in the southern section and is bordered by listed buildings to the north;
- Grovesend Field has poor access, meaning increased traffic will impact on Stone Drive, Old Church Road, Oak Drive, and the awkward junctions with Mathon Road and Walwyn Road. Old Church Road is narrow and lacks a pavement, making future residents of any development less likely to walk to the village, and the ongoing safety of current pedestrian users is also a concern.
- The Mill Lane site provides a safer and more sustainable option, with excellent pedestrian access to key amenities including the school, village hall, scout hut, village shops and public transport on Walwyn Road / the station. Any vehicle traffic accesses Walwyn Road directly, via a well designed junction with excellent sight lines.
- Planning Permission sought, funding is in place ready to progress development. This is a well-considered proposal with detailed documents addressing key aspects. There is opportunity for the community to influence planning conditions, and the application includes protection of trees, enhanced planting and landscape protection.
- This site was identified by HCC a highly suitable for housing in 2012 and 2015, whereas the 2012 SHLAA concluded that for land at Grovesend Farm, the local road network would not sustain intensification of use.

Conclusion

You will gather from the above that I am very much in favour of the development on the Mill Lane site, and the removal of Grovesend Farm as changes to be made to the current NDP. This would more accurately reflect the wishes of the community as previously detailed in 1 above.

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 17 March 2020 12:52
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Chris and Christine
Last name	Honeywill
Which plan are you commenting on?	Grovesend Field - and Mill Lane possible substitution in NDP
Comment type	Comment
Your comments	<p>We would like to register that we believe that a development at Mill Lane, behind the school and village hall, would be far more acceptable in the Colwall NDP than one at Grovesend Field, which is within the conservation area. Grovesend Field has historical links which should be preserved and it also has the problem of unsafe access, both by car and on foot. We appreciate that Colwall must meet its housing quota but the Mill Lane site doesn't have the conservation needs of Grovesend Field and has good, safer access to village amenities. We hope that this adaptation of the NDP can be possible.</p>

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 27 March 2020 16:10
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Colette
Last name	Redmond
Which plan are you commenting on?	Proposed development of Grovesend Field, off Old Church Road
Comment type	Objection
Your comments	<p>Old Church Road is narrow, twisting and without pavements for the majority of its length - which is dangerous and encourages people to drive rather than walk. In addition, it has poor access and some already awkward junctions on Mathon Road and Stone Drive. Grovesend Field lies within the village Conservation Area and is bordered by listed buildings. It also contains remains of Colwall's industrial heritage. In contrast, however, the planned development on the land adjacent to Colwall Primary School on Mill Lane provides clear and unrestricted vehicle access and, consequently, safe access to pedestrians and is also conveniently situated for all the village amenities. It offers a similar housing capacity to the Grovesend Field site. I would therefore suggest that the Mill Lane site should replace the Grovesend Field site in the Colwall Neighbourhood Development Plan.</p>

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 26 March 2020 10:33
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Caroline
Last name	Series
Which plan are you commenting on?	Colwall Neighbourhood development plan
Comment type	Objection
Your comments	<p>I am very concerned about the proposal to build on the Grovesend field site. It lies within the conservation area and any such development would massively impact the surroundings and character of the area. Many people including myself frequently walk along Old Church Road which is narrow with poor visibility and without pavements and the increased volume of traffic could potentially make it really dangerous, especially at night. There is another potential site on Mill Lane is much safer and more sustainable. Although development here is currently prevented on the draft plan, it has very similar capacity and already has a well-considered planning application submitted. I urge you to change the Neighbourhood Development Plan to choose this option which was the one overwhelmingly voted for by the village consultation in 2014. The impact on the nature of the village would be far less.</p>

Dear Neighbourhood Planning Team,

Please find my comments regarding the request for feedback on the latest draft of the Colwall NDP

Whilst I am agreement with the concept of having an NDP and the need to meet the minimum housing growth targets – as we are in a protected AONB, I do not support the current recommendations of the latest draft plan.

In particular I do not believe the process in the selection of sites for housing development reflects the strength of evidence and majority of consultation respondent feedback is not reflected in the draft plan.

I have followed and supported the preferred process of attending and listening to plan authors and contributors and provided appropriate evidence, feedback and challenge in a timely fashion and when requested through the various development stages since 2013.

However, I have been frustrated that my comments and those of the majority of respondents has not been considered and acted upon during these consultation process and stages.

So I would like to formally challenge the current NDP process and design finalisation recommendations in a number of areas:

- I do not believe the LSCA has been developed consistently and it should not be the only consideration in determining sites for Housing development. It has also changed over time without detailed explanation or in consultation with village residents. As a consequence Grovesend Field is included as a site for development in the latest plan even though it was excluded in earlier versions and the Mill Lane site area which was considered suitable for development in earlier plans has now has been excluded.
- A recent application for appropriate development on Mill Lane has been very strongly supported by a clear majority of village respondents – yet the Parish Council have rejected the application and excluded it as an option in the NDP. This happened even though a well constructed and appropriately designed proposal was formally submitted before the draft NDP was finalised and within 2days of the Draft NDP being formally shared at the Colwall Village Hall.
- Other key studies and documents such as Herefordshire Council's own SHLAA recommendations and the English Heritage confirmation of the Colwall Conservation Area which highlighted Grovesend Field as a protected open space and the 'green lung' of the village do not seem to have been given the same consideration.
- No landscape impact assessment has been completed for the Grovesend field development
- In all meetings and feedback the vast majority of respondents have provided feedback regarding the importance of highways, access and infrastructure in choosing sites for development. This does not seem to be considered in the draft plan recommendations with particular regard to the lack of suitability of Old Church Road to support future development
- The draft plan does not offer alternative housing development options and sites for the village residents to provide feedback on and ultimately vote upon. During the process there have always been options available including
 - A. The Mill Lane site, location near to services and highways links has much greater suitability for potential development
 - B. A higher assumption on infill development. Recent average new house infill developments have been significantly higher than the projected average included in the plan. These developments are spread across the village and with appropriate

planning could ensure diverse development and less pressure on particular locations and roads of bigger housing developments. A number of these 1 or few house development applications have been rejected by the PC when they could have contributed to the Plans housing targets.

Both sites are fields within the AONB, and both are clearly visible from the Malvern Hills. However:

- Grovesend Field is within the Colwall Conservation Area and should be awarded greater protection;
- Grovesend Field is of historical importance to Colwall with the remains of Colwall's industrial heritage in the southern section and is bordered by listed buildings to the north;
- Grovesend Field has poor access, meaning increased traffic will impact on Stone Drive, Old Church Road, Oak Drive, and the awkward junctions with Mathon Road and Walwyn Road. Old Church Road is narrow and lacks a pavement, making future residents of any development less likely to walk to the village, and the ongoing safety of current pedestrian users is also a concern.
- The Mill Lane site provides a safer and more sustainable option, with excellent pedestrian access to key amenities including the school, village hall, scout hut, village shops and public transport on Walwyn Road / the station. Any vehicle traffic accesses Walwyn Road directly, via a well designed junction with excellent sight lines.

I would be very happy to provide any additional info on request

Regards

Chris Stephens

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 12 March 2020 18:10
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Carl
Last name	Tipping
Which plan are you commenting on?	Colwall
Comment type	Objection
Your comments	<p>The current draft for the development of Grovesend field is unsuitable. The field itself is a local conservation area for the village which is enjoyed by many. Church road is unsuitable to accept the increase in traffic that would be generated by the addition of the proposed homes. This road and Stone drive both frequently see pedestrian and vehicular near misses with the current traffic. I can only see this intensifying under this plan. In short it is a ludicrous proposal that needs to be stopped before we ruin this beautiful village or even worse, kill someone. Please do not proceed with this plan.</p>

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 19 March 2020 10:27
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Christopher
Last name	Walker
Which plan are you commenting on?	Colwall Neighbourhood Development plan
Comment type	Objection
Your comments	<p>My objection is against the current NDP; Specifically the section that includes the development of Grovesend Field, off old church road, potentially allowing 37 houses to be built (this would be subject to any future planning application and more could be proposed by a developer). The draft plan also prevents building on the land by the school in Mill lane (which was an option well-supported by villagers in the past, and a site that offers very similar capacity and already has a well considered planning application submitted by a local developer). Both sites are fields within the AONB, and both are clearly visible from the Malvern Hills. However I believe we should include Mill Lane because; - Grovesend Field is within the Colwall conservation area and should be awarded greater protection. - Grovesend Field is of historical importance to Colwall with the remains of Colwall's industrial heritage in the southern section and is bordered by listed buildings to the north. - Grovesend Field has poor access, meaning increased traffic will impact on Stone Drive, Old Church Road, Oak drive, and the awkward junctions with Mathon Road and Walwyn Road. Old Church Road is narrow and lacks a pavement, making future residents of any development less likely to walk to the village, and the ongoing safety of current pedestrian users is also a concern. -</p>

The Mill Lane site provides a safer and more sustainable option, with excellent pedestrian access to key amenities including the school, village hall, scout hut, village shops and public transport on Walwyn road/the station. Any vehicle traffic accesses Walwyn Road directly, via a well designed junction with excellent site lines. Many thanks for considering my comments.

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 27 March 2020 19:57
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Charlotte
Last name	Stephens
Which plan are you commenting on?	COLWALL REGULATION 16 DRAFT NDP
Comment type	Objection
Your comments	<p>Dear Neighbourhood Planning Team, My name is Miss Charlotte Stephens and I have been involved in the Colwall NDP process and the future plans discussions for the village. I am offering my comments as an individual and I also believe as a representative of the young adult population segment. Whilst I am agreement with the concept of having an NDP and the need to meet the minimum housing growth targets – as we are in a protected AONB, I do not support the current recommendations of the latest draft plan. In particular I do not believe the process in the selection of sites for housing development reflects the strength of evidence and majority of consultation respondent feedback is not reflected in the draft plan. I have followed and supported the preferred process of attending and listening to plan authors and contributors and provided appropriate evidence, feedback and challenge in a timely fashion and when requested through the various development stages since 2013. However, I have been frustrated that my comments and those of the majority of respondents has not been considered and acted upon during these consultation process and stages. So I would like to formally challenge the current NDP process and design finalisation recommendations in a number of areas: • I do not believe the LSCA</p>

has been developed consistently and it should not be the only consideration in determining sites for Housing development. It has also changed over time without detailed explanation or in consultation with village residents. As a consequence Grovesend Field is included as a site for development in the latest plan even though it was excluded in earlier versions and the Mill Lane site area which was considered suitable for development in earlier plans has now been excluded. • A recent application for appropriate development on Mill Lane has been very strongly supported by a clear majority of village respondents – yet the Parish Council have rejected the application and excluded it as an option in the NDP. This happened even though a well constructed and appropriately designed proposal was formally submitted before the draft NDP was finalised and within 2 days of the Draft NDP being formally shared at the Colwall Village Hall. • Other key studies and documents such as Herefordshire Council’s own SHLAA recommendations and the English Heritage confirmation of the Colwall Conservation Area which highlighted Grovesend Field as a protected open space and the ‘green lung’ of the village do not seem to have been given the same consideration. • No landscape impact assessment has been completed for the Grovesend field development • In all village NDP discussion meetings and feedback the vast majority of respondents have provided feedback regarding the importance of highways, access and infrastructure in choosing sites for development. This does not seem to be considered in the draft plan recommendations with particular regard to the lack of suitability of Old Church Road to support future development • The draft plan does not offer alternative housing development options and sites for the village residents to provide feedback on and ultimately vote upon. During the process there have always been options available including A. The Mill Lane site, location near to services and highways links has much greater suitability for potential development B. A higher assumption on infill development. Recent average new house infill developments have been significantly higher than the projected average included in the plan. These

developments are spread across the village and with appropriate planning could ensure diverse development and less pressure on particular locations and roads of bigger housing developments. A number of these 1 or few house development applications have been rejected by the PC when they could have contributed to the Plans housing targets. Both sites are fields within the AONB, and both are clearly visible from the Malvern Hills. However:

- Grovesend Field is within the Colwall Conservation Area and should be awarded greater protection;
- Grovesend Field is of historical importance to Colwall with the remains of Colwall's industrial heritage in the southern section and is bordered by listed buildings to the north;
- Grovesend Field has poor access, meaning increased traffic will impact on Stone Drive, Old Church Road, Oak Drive, and the awkward junctions with Mathon Road and Walwyn Road. Old Church Road is narrow and lacks a pavement, making future residents of any development less likely to walk to the village, and the ongoing safety of current pedestrian users is also a concern.
- The Mill Lane site provides a safer and more sustainable option, with excellent pedestrian access to key amenities including the school, village hall, scout hut, village shops and public transport on Walwyn Road / the station. Any vehicle traffic accesses Walwyn Road directly, via a well designed junction with excellent sight lines.

Regards Miss Charlotte Stephens



The Coal
Authority



200 Lichfield Lane
Berry Hill
Mansfield
Nottinghamshire
NG18 4RG

Tel: 01623 637 119 (Planning Enquiries)

Email: planningconsultation@coal.gov.uk

Web: www.gov.uk/coalauthority

For the Attention of: Neighbourhood Planning
Herefordshire Council

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

27 March 2020

Dear Neighbourhood Planning

Colwall Neighbourhood Development 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: Barton Villas - 5211
Your ref:
Please ask for: Russell Pryce
Direct Line: 01981 242928
Mobile: 07931 808200
E-mail: russell@collinsdb.co.uk

26th March 2020

Dear Sir/Madam

Description: Objection to Colwall Draft NDP Regulation 16 Consultation

I write to object to the Regulation 16 Consultation Draft NDP on behalf the landowner of number 1 and 2 Barton Villas, Walwyn Road, located at the south western end of Colwall.

The objections primarily concern NDP Policy CSB1 – Settlement Boundary and the exclusion of our client's property from the proposed Colwall NDP settlement boundary.

Our client owns numbers 1 and 2 Barton Villas, a pair of semi detached brick properties located on the north side of Walwyn Road (B4218) on the entrance into the village from the south. Immediately east is also another detached dwelling - Broadleigh Cottage, which is grade II listed.

Barton Villa's and their curtilage is outlined in red on the plan below.



Paragraph 6.0.10 explains the dwelling numbers that are required to meet the minimum Core Strategy housing requirement of 160 new dwellings. Whilst a 10% buffer on this minimum requirement has also been introduced taking the total to 176 units, this remains a proportionately low figure for the largest and one of the most sustainable rural settlements in Herefordshire – equating to just under nine dwellings per annum. Having regard to the AONB landscape sensitivities of the settlement, there is a greater likelihood that not all potential windfall plots and other sites will be suitable. The buffer should therefore be at least 20% to promote additional housing and ensure the minimum requirement is achieved – this would equate to an additional 16 dwellings. Policy CSB1 should be amended accordingly.

Turning to the settlement boundary plan, we note that the settlement boundary in the current version of the NDP has been extended to encompass the existing dwellings and their gardens running west beyond Yew Tree Close on the south side of the Walwyn Road. This alteration is welcomed and logical.

However, we also recommend that the settlement boundary be extended to encompass Barton Villas and if deemed appropriate, Broadleigh Cottage and their respective curtilages.

Section 6 of the NDP explains the NDP development strategy and the desire to define a new settlement boundary for Colwall, which is fully supported.

Paragraph 6.1.9 summarises the proposed enlargements of the settlement boundary compared with that which existed with the Unitary Development Plan as follows

‘Six modest extensions to the former settlement boundary from the Herefordshire UDP are proposed. Four are to include land that is substantially developed and consequently should be incorporated into the settlement boundary. The remaining two are to provide additional development. These are shown on Map 4’.

Paragraph 6.0.12 then explains the criteria that has been used to define the settlement boundary. One criteria being as follows:

‘Include areas that lie outside the historic settlement boundary but which are adjacent to it and are already substantially built out. This is to provide flexibility and ensure areas are not unreasonably excluded from future changes by lying just outside the settlement boundary’.

Applying this criteria to our client’s properties clearly indicates that they should be included within the settlement boundary i.e. a site that is substantially developed and lies adjacent the historic settlement boundary. To further explain this, our client’s properties have been part of Colwall village for well over 100 years. The properties sit prominently and in an elevated position above the road. When approaching the village travelling east along Walwyn Road, Barton Villas along with properties at the entrance to Thornley Close directly opposite effectively signify the start of the village in built form terms. This is further reinforced by the fact the pavement alongside the highway commences in the south west corner of the garden of number 1 Barton Villas and the 30mph speed limit on entering the village also commences approximately 50 metres west of Barton Villas gardens.

Similarly, the experience when driving west along Walwyn Road on exiting the village is that the terminus of the village in built development terms is the western curtilage boundary of 1 Barton Villas.

The outer boundaries of the curtilages of these properties are also well defined and contained by mature hedges and trees, which further associates them with the village as opposed to open countryside.

They comprise part of the historic built up area of the village and should therefore be included within the new settlement boundary.

Their exclusion is also inconsistent with the manner in which the settlement boundary has been drawn elsewhere. In particular, the properties on the west side of Walwyn Road opposite the former primary school have been included in the settlement boundary. These are also an offshoot of built development as no other properties on the west side of Walwyn Road exist in this area yet notwithstanding this, they are included in the settlement boundary.

The last point concerns windfall development. Of the 70 additional dwellings identified at paragraph 6.0.10 as being required up to 2031, 24 have been accounted for through delivery as windfall with the remaining 46 delivered through site allocations. An allowance for windfall based on past trends is of course good practice but what is not clear is the deliverability of this windfall provision particularly as the new settlement boundary has been tightly drawn around existing built development. The achievability of this is further questionable by the final sentence of the last paragraph within policy CSB1, which recommends that new development should not build up to the edge of the identified settlement boundary. It is unreasonable and inconsistent with the housing growth aims of the NPPF to apply a blanket restrictive criteria such as this.

The generous curtilage forming part of 1 and 2 Barton Villas would provide an opportunity for modest windfall development assisting in meeting the NDP windfall provision. The site has limited landscape sensitivity, a new access could be achieved with appropriate visibility for the benefit of existing and proposed residents and dwellings could be sited to follow the existing pattern and density of development in the locality.

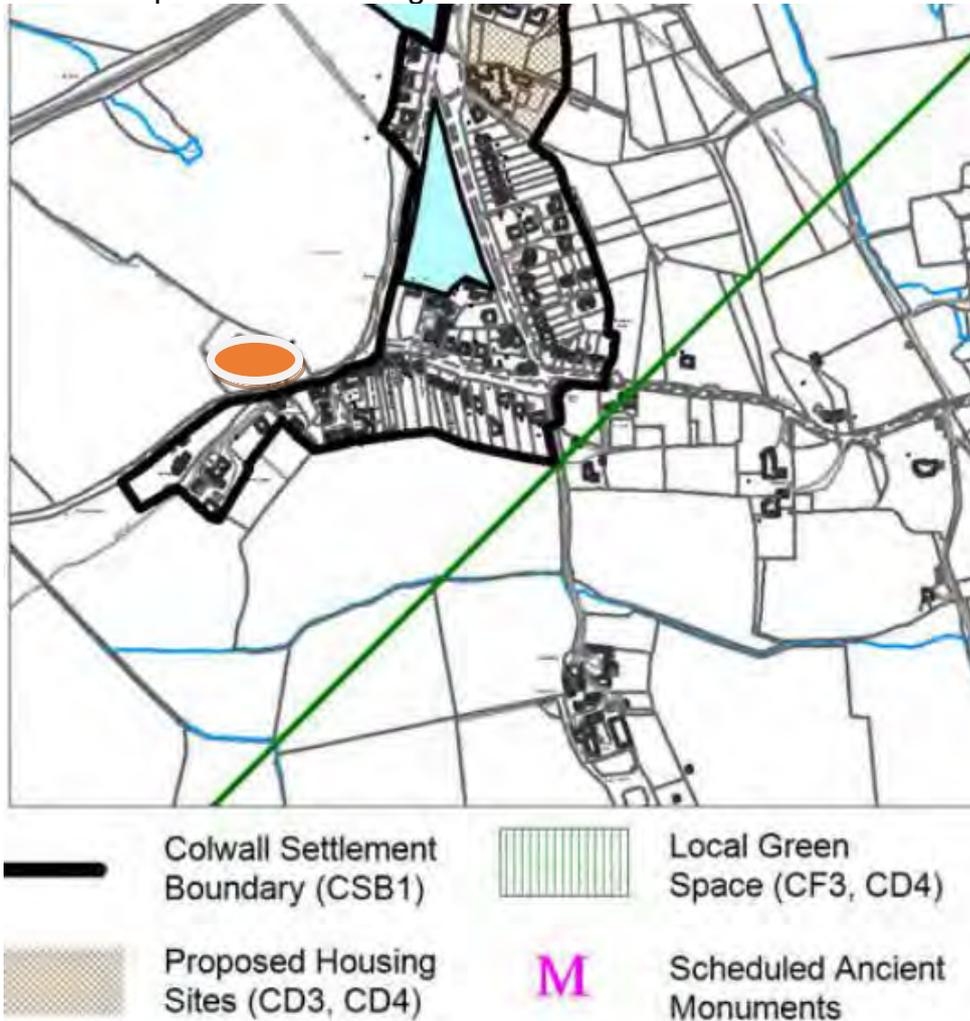
Additionally, the site benefits from an existing footpath link directly to the heart of the settlement and associated facilities and train station. The nearest bus stops providing a reasonably regular service into Ledbury and Malvern are also located 150 metre east of the site. The site can therefore be considered sustainable in locational and accessibility terms.

Summary

The recommended changes to the NDP are as follows:

1. The total housing requirement should incorporate a 20% buffer rather than the 10% as currently proposed. Consequently, policy CSB1 should be amended to require a minimum of **86** new dwellings and the final part of the last paragraph within policy CSB1 deleted as follows:
 - a. *Where possible, built form should respect and continue the existing building line and not build up to the edge of the identified settlement boundary.*

2. Further evidence should be provided of the availability and deliverability of the 24 windfall plots.
3. The proposed settlement boundary should be enlarged to accommodate 1 and 2 Barton Villas as approximately marked up in orange on the extract of the NDP Colwall settlement boundary plan below. This amendment is consistent with the NDP criteria used to define the settlement boundary and manner in which similar small pockets of historic development have been included elsewhere around Colwall. Furthermore, the inclusion will also create an opportunity for modest windfall development that can integrate with and respects the landscape character and settlement pattern of the village.



I would appreciate consideration of this representation.

Yours faithfully

Russell Pryce MRTPI
Planning Manager

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 24 March 2020 12:09
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Dawn
Last name	Harford
Which plan are you commenting on?	Colwall Neighbourhood Development Plan
Comment type	Comment
Your comments	<p>1 Grovesend Field is within the Colwall Conservation Area and should be awarded greater protection; 2 Grovesend Field is of historical importance to Colwall with the remains of Colwall's industrial heritage in the southern section and is bordered by listed buildings to the north; • Grovesend Field has poor access, meaning increased traffic will impact on Stone Drive, Old Church Road, Oak Drive, and the awkward junctions with Mathon Road and Walwyn Road. Old Church Road is narrow and lacks a pavement, making future residents of any development less likely to walk to the village, and the ongoing safety of current pedestrian users is also a concern. • The Mill Lane site provides a safer and more sustainable option, with excellent pedestrian access to key amenities including the school, village hall, scout hut, village shops and public transport on Walwyn Road / the station. Any vehicle traffic accesses Walwyn Road directly, via a well designed junction with excellent sight lines.</p>

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 12 March 2020 20:47
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	David M
Last name	Longman
Which plan are you commenting on?	Colwall NPD
Comment type	Comment
Your comments	Although not directly affected by the plan, I gather that there is an application to substitute the Grovesend Field development with one in Mill Lane. I object to this, Mill Lane is a much busier road than Old Church road and the extra traffic generated by houses would destroy the rural aspect of the road and be a traffic hazard and danger to any pedestrians. There is no footpath after the village hall. For the proposers to say that it is nearer the village facilities is not true. The only facility it is nearer to is the church. The original plan should be adhered to.

Latham, James

From: Norman Ryan <Ryan.Norman@dwrcymru.com>
Sent: 21 February 2020 09:06
To: Neighbourhood Planning Team
Subject: {Disarmed} RE: Colwall Regulation 16 submission neighbourhood development plan consultation

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,

Thanks for consulting us on the below. As you may be aware, Welsh Water are not the statutory water and sewerage undertaker for Colwall therefore we have no comments to make.

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: 14 February 2020 10:44
Subject: Colwall Regulation 16 submission neighbourhood development plan consultation

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

Dear Consultee,

Colwall 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/3046/colwall_neighbourhood_development_plan](https://www.herefordshire.gov.uk/directory_record/3046/colwall_neighbourhood_development_plan)**

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

The consultation runs from 14 February 2020 to 27 March 2020.

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

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 27 March 2020 19:52
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	EMILIE
Last name	STEPHENS
Which plan are you commenting on?	COLWALL REGULATION 16 DRAFT NDP
Comment type	Objection
Your comments	<p>Dear Neighbourhood Planning Team, My name is Miss Emilie Stephens and I have been involved in the Colwall NDP process and the future plans discussions for the village. I am offering my comments as an individual and I also believe as a representative of the young adult population segment. Whilst I am agreement with the concept of having an NDP and the need to meet the minimum housing growth targets – as we are in a protected AONB, I do not support the current recommendations of the latest draft plan. In particular I do not believe the process in the selection of sites for housing development reflects the strength of evidence and majority of consultation respondent feedback is not reflected in the draft plan. I have followed and supported the preferred process of attending and listening to plan authors and contributors and provided appropriate evidence, feedback and challenge in a timely fashion and when requested through the various development stages since 2013. However, I have been frustrated that my comments and those of the majority of respondents has not been considered and acted upon during these consultation process and stages. So I would like to formally challenge the current NDP process and design finalisation recommendations in a number of areas: • I do not believe the LSCA</p>

has been developed consistently and it should not be the only consideration in determining sites for Housing development. It has also changed over time without detailed explanation or in consultation with village residents. As a consequence Grovesend Field is included as a site for development in the latest plan even though it was excluded in earlier versions and the Mill Lane site area which was considered suitable for development in earlier plans has now been excluded. • A recent application for appropriate development on Mill Lane has been very strongly supported by a clear majority of village respondents – yet the Parish Council have rejected the application and excluded it as an option in the NDP. This happened even though a well constructed and appropriately designed proposal was formally submitted before the draft NDP was finalised and within 2 days of the Draft NDP being formally shared at the Colwall Village Hall. • Other key studies and documents such as Herefordshire Council’s own SHLAA recommendations and the English Heritage confirmation of the Colwall Conservation Area which highlighted Grovesend Field as a protected open space and the ‘green lung’ of the village do not seem to have been given the same consideration. • No landscape impact assessment has been completed for the Grovesend field development • In all village NDP discussion meetings and feedback the vast majority of respondents have provided feedback regarding the importance of highways, access and infrastructure in choosing sites for development. This does not seem to be considered in the draft plan recommendations with particular regard to the lack of suitability of Old Church Road to support future development • The draft plan does not offer alternative housing development options and sites for the village residents to provide feedback on and ultimately vote upon. During the process there have always been options available including A. The Mill Lane site, location near to services and highways links has much greater suitability for potential development B. A higher assumption on infill development. Recent average new house infill developments have been significantly higher than the projected average included in the plan. These

developments are spread across the village and with appropriate planning could ensure diverse development and less pressure on particular locations and roads of bigger housing developments. A number of these 1 or few house development applications have been rejected by the PC when they could have contributed to the Plans housing targets. Both sites are fields within the AONB, and both are clearly visible from the Malvern Hills. However:

- Grovesend Field is within the Colwall Conservation Area and should be awarded greater protection;
- Grovesend Field is of historical importance to Colwall with the remains of Colwall's industrial heritage in the southern section and is bordered by listed buildings to the north;
- Grovesend Field has poor access, meaning increased traffic will impact on Stone Drive, Old Church Road, Oak Drive, and the awkward junctions with Mathon Road and Walwyn Road. Old Church Road is narrow and lacks a pavement, making future residents of any development less likely to walk to the village, and the ongoing safety of current pedestrian users is also a concern.
- The Mill Lane site provides a safer and more sustainable option, with excellent pedestrian access to key amenities including the school, village hall, scout hut, village shops and public transport on Walwyn Road / the station. Any vehicle traffic accesses Walwyn Road directly, via a well designed junction with excellent sight lines.

Regards Miss E Stephens

Neighbourhood Planning Team
Planning Services

PO Box 4
HERFORD HR1 2ZB.

15/3/2020

Dear Sirs,

The best way to preserve Grovesend Field is by using the MILL LANE SITE for development.

It would be more useful and less dangerous giving access to many key amenities and not committing extra traffic to OAK DRIVE, already quite a busy slip road.

Yours faithfully,

Mr. F. W. J. ALLSOP

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 13 March 2020 16:38
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Fiona
Last name	Campbell
Which plan are you commenting on?	Colwall NDP
Comment type	Objection
Your comments	<p>I have recently moved to Colwall and have read the current NDP with interest. I can see that currently the land by the new school is not included in the plan, though there has been a recent planning application to build 37 houses on this site. . This looks well thought through with a variety of housing types., suitable for young families. This would seem to make absolute sense considering the location, the access road which would support the increased traffic, and closeness of the facilities that the village offers including the school, railway station, shops, pubs etc.... all easy and safely walkable as there are pavements and traffic lights to manage the traffic flow down Walwyn Road. I also note that on the NDP there is a possibility at some time in the future of development for approximately the same number of properties on Grovesend Field. This would seem a much less attractive proposition given the location. Access to this land would be from Old Church Road which is quite narrow with no pavements so consequently could prove dangerous for pedestrian.s. The increase in traffic through Oak Drive and Stone Drive, both of which are tricky at the best of times, would be disruptive to the village. In conclusion, I would like to suggest that the Mill Road site is incorporated into the NDP in place of Grovesend Field as a safer, better option for all.</p>

Latham, James

From: Gavin Beard
Sent: 31 March 2020 16:09
To: Neighbourhood Planning Team
Subject: Colwall NDP - Important Access Representation
Attachments: Colwall NDP - Grovesend Farm Access.pdf

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.

Good Afternoon

I recognise this is narrowly outside the consultation window for the Colwall NDP, which closed on Friday 27th March, but this response attached (on Tuesday 31st March) has only been made possible by the fulfilment yesterday (Monday 30th March) of a Freedom of Information Request made to Herefordshire Council.

The information it contains is highly pertinent to delivery of the NDP, which is why I have also copied it to Sam Banks, our Councillor Tony Johnson, and Bruce Evans of highways (see below).

I made the FOI request on Sam's suggestion earlier in March.

Can you please confirm receipt, and confirm that the document attached will be included as part of the representations to the consultation.

Many thanks

Gavin Beard

----- Forwarded message -----

From: **Gavin Beard**
Date: Tue, Mar 31, 2020 at 4:00 PM
Subject: Colwall NDP - Important Access Representation
To: Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>, <ajohnson@herefordshire.gov.uk>, <bje@herefordshire.gov.uk>

Dear Sam, Bruce, Tony

Earlier in March, on Sam's advice, I lodged a Freedom of Information request with Herefordshire Council for details of the traffic study and advice which was repeated many (79) times in the Reg 14 responses to representations document as addressing access / traffic concerns, specifically:

"The Highway Authority has confirmed (R Close email 16 June 2017 attached) it is content for the Grovesend development of 37 homes to go ahead "... subject to the provision of a safe and suitably surfaced (suitable for all seasons of the year) pedestrian link or links to the amenities and facilities of Colwall Village". The issue of pedestrian access will therefore have to be dealt with as part of the development of the site."

I received a response to this request yesterday (Monday 30th March), with two documents (both included in my attached representation), a highways response to a question from the Parish Council on Grovesend

Farm, and then an e-mail from Roland Close to Colwall Parish Council on how highways concerns might be addressed. This identified 3 possible options to providing separate pedestrian access to the land at Grovesend Farm should development proceed.

However, since June 2017, none of those options have been discussed with the landowners whose land is required to deliver them, and it appears there has been a deliberate decision not to engage, noting the use of the word '**confidentially**' in the e-mail identifying the options.

These options do not have the support of the landowners. Please see the attached document, which is in response to the new information, and expect representations from the landowners individually.

While I appreciate that the consultation for the NDP closed on Friday 27th March, given the pertinence of this information to the plan, and that the FOI request was fulfilled on the 30th March, I trust that the attached response on the 31st March will be included. As detailed in the document, I had requested this information from the NDP author in May 2019, but it was not provided.

Sam, if you can please let me know the status of this information for inclusion in the consultation representations that would be most appreciated.

Best regards

Gavin Beard

LATE REPRESENTATION

Colwall NDP – Grovesend Farm Pedestrian Access

The inclusion of Grovesend Field in the Reg. 14 and Reg. 16 versions of the Colwall NDP has been regularly challenged on issues with access. The limitations of the supporting road network was also why the land was specifically excluded when Herefordshire developed their SHLAA. In 2011

In the Reg 14 responses to representations document, the following was repeated (79 times) to show that the site was deliverable from a Highways perspective.

"The Highway Authority has confirmed (R Close email 16 June 2017 attached) it is content for the Grovesend development of 37 homes to go ahead *... subject to the provision of a safe and suitably surfaced (suitable for all seasons of the year) pedestrian link or links to the amenities and facilities of Colwall Village*". The issue of pedestrian access will therefore have to be dealt with as part of the development of the site."

No detailed information on the study behind this statement was provided in the NDP documentation, or following requests to the NDP Author in May and June of 2019.

When the REG 16 consultation commenced, I contacted Sam Banks in the Herefordshire Neighbourhood Planning Team on the 2nd March 2020 asking for detail on the traffic study, and received a response on the 11th March 2020 suggesting I make a Freedom of Information request for this.

I made the request to Herefordshire Council on the 12th March 2020, and the information was sent to me on the 30th March 2020, which included:

- The study which supported this statement (Appendix A), and
- The correspondence from Roland Close. (Appendix B)

With access to the full e-mail from Roland Close, rather than the short extract included above and in the Reg 14 responses, he notes that there is a risk the site allocation may be challenged on whether it is deliverable on highways grounds, and that three options for pedestrian access could be explored.

It is emphasised in bold in the e-mail that these options should be considered '**confidential**', although it is not clear why. The options are directly quoted as:

- a) Providing a 2m footway along Old Church Road / C1165 from any proposed means of access to Stone Drive (U6612) – *it appears that this would need obtaining land from 'Pembroke Lodge'; and / or*
- b) Providing a footway link to Stone Close (U66613) in that gap between numbers 5 & 6; and / or
- c) Surfacing in an appropriate material public footpath CW30 from the site to the 'Thai Rama site' together with provision of pedestrian footbridge over the brook and the re-surfacing in an appropriate material of public footpaths CW30A and CW30V connecting to 'The Crescent'. *I am unaware from a legal point of view if a developer paid monies to the LPA to undertake such works whether the Highway Authority can undertake such works without the consent of the landowner(s). You may wish to ask Andy Byng and our colleagues in public rights of way that question.*

An indication of whether one or more of these options is actually feasible would greatly reduce the current uncertainty as to the fundamental deliverability of the identified development sites in the current Colwall NDP.

I am not sure why somebody in a Development Control Officer role would be actively engaged with Neighbourhood Plan matters, and the Parish Council's reliance on his 'confidential' opinion seems excessive.

Each option above requires the support of / engagement with one or more landowners to deliver. However, it is my understanding that none of the landowners for options a, b, and c have been approached to assess whether any of the suggested options are actually feasible (i.e. the options identified either require or pass through their land).

Can Herefordshire Council / Herefordshire Highways provide any evidence to demonstrate that these options have been properly assessed and are realistically deliverable?

My understanding on each option is as follows:

Option A – Footpath on Old Church Road

The option of providing a 2m footpath along Old Church Road is not considered achievable given the narrowness of the lane, which is only 4 to 4.3 m wide.

As noted in the e-mail from Roland Close, this would require purchase of land from Pembroke Lodge, removal of an established hedge, and possibly impact on / or require removal of trees with Preservation Orders in place.

A letter is attached from the owner of Pembroke Lodge, Appendix C.

The rural nature of Old Church Road is a key feature in the description of the Colwall Conservation Area designation. The provision of this link by means of widening the road to accommodate a footway would have a detrimental and unacceptable impact on the character and setting of the Conservation Area. Has a Conservation Officer been consulted on Option A?

Option B – Pedestrian Access via Stone Close

The e-mail suggests that there is sufficient gap between numbers 5 and 6 Stone Close (off Stone Drive) to allow the installation of a footpath through to the field. However, there is insufficient space at the end of Stone Close, as the road does not finish in a 'hammerhead' design, but rather splits directly into the driveways of the two houses.

The only way a footpath through to the field could be achieved is through the purchase of land from numbers 5 and 6, removal of an established hedgerow and for the path to be very close to number 5, which has limited garden space in comparison to others on the road already, as the space is mostly occupied by number 6's driveway and parking (it should be noted that on-street parking is not available due to the narrow width of Stone Close).

The photo below, showing the end of Stone Close, clearly shows the limited space between the two properties. The dividing hedge belongs to number 6 on the right, whose driveway starts where Stone Close ends.

In addition, neither of the owners of numbers 5 and 6 are willing to sell land to provide a path, as this would result in a significant loss of amenity for themselves. Please see the attached letter from the householders in Appendix D.



Option C – Footpath improvements towards the Thai Restaurant / The Crescent

This approach is reliant on the permission of multiple landowners to make the necessary improvements. It may support access to the school, but people are unlikely to choose it for accessing the amenities in the centre of the village as it would be a significant detour compared to a direct route walking up the narrow Old Church Road which does not have a footpath. Making these changes to an all-weather surface would substantially alter the nature of these rural footpaths across fields and may well result in adverse ecological impacts.

It is my understanding that the landowner/s whose land the paths cross have not been consulted on this, and that they do not support the suggested work on their land.

I also note that the e-mail from Roland Close suggests exploring options for undertaking improvement work without the consent of the landowner/s. This does not seem to be a collaborative approach when the subject has not been discussed with them, particularly when the resultant pedestrian access would effectively be to the 'wrong' part of the village.

Summary

The detail of these options has not been provided in any of the NDP information – a significant omission given their importance to the deliverability of Grovesend Farm for housing.

I do not understand why, when faced with the difficulties of delivering this site compared to the previously identified Mill Lane site (SHLAA, NDP 2015), which has many benefits including simple pedestrian and vehicle access, has Grovesend Field continued to be promoted as the only new development site for consideration?

Appendix A – Traffic Study (precise date unknown)

Colwall - Grovesend farm – NDP allocation

Question posed – “Would H/T be objecting to such an allocation if it were to appear as a policy (stage 14)”

There are a number of issues which a development such as Grovesend Farm raises such as:

1. There are no footways along Old Church Road, carriageway width only measuring between 4m to 4.3m.
2. Existing traffic flow serves approximately 150 properties along with the Down School.
3. Ball park figure, the proposed development is for 37 to 80 houses, this would generate approximately 259 to 560 trips per day based on 7 trips per property. This is on top of the 1050 vehicles trips (these are rough approximate figures and should be treated as such)
4. Old Church Road has narrow roads with limited to no passing places, pedestrians and cyclists must walk in the carriageway.
5. It is recognised that vehicles wrongly using the one-way system around Brockhill Road, Walwyn Road and Church Road, any development could increase the potential conflict, no accident records in this location to date thought this is only Killed, Seriously Injured and any which have been reported over the phone to the police, and would not include any shunts or bumps.
6. Insufficient parking for the site, residents and visitor parking will cause issues on the surrounding network e.g. blocking visibility splays and narrowing the already narrow carriageway.

The highways network around the Grovesend is a sensitive location and would need to be properly assessed as the number of properties will increase the vehicle trips. Due to the infrastructure in the vicinity of the site, this will conflict with the shared use of lane putting pedestrians and vulnerable users at risk. Therefore 80 houses and the trips associated would appear not to be acceptable, it is recognised that some development can be accommodated but this would need to be worked through with the parish council and the developer.

Any development will need to assess and address the concerns including mitigation relating to:

1. Shared use of the network – (GTA)
2. Impact on the existing usage
3. Speed
4. Parking
5. Alternative footway connectivity such as Stone close
6. Appropriate visibility splays, access and forward vis.
7. Review of the network specifically the one way system of Brockhill Road, Walwyn Road, and Old Church Road.

The councils design guide recommends up to 50 properties served by a share space design with a road width of 4.5m.

MfS ref 5.4 and 7.2 is useful in understanding the constraints of a site. The PC's notes on the locality are noted. Point 6.7.3 of MfS refers to emergency vehicles and the specification required regarding access to a site for emergency vehicles e.g. a minimum of 9.7 between kerbs. Point 6.3.3

and 6.3.4 of MfS refers to the need to understand all users' requirements around a development including vulnerable users. MfS section 7.4 refers to achieving appropriate traffic speeds within the site. Parking provision on site should accommodate both residents and visitors to avoid any over spill onto the existing network.

MfS 1 and 2 along with the HC design guide are useful reference documents in both the on-site and off-site design. Department of Transport guidance on Transport Assessments should also be referred to.

In conclusion

The allocation of housing needs to be proportionate to what can be accommodated on the network, we do not object to the principle though the number needs to be significantly reduced from the 80 discussed.

The PC need to be aware that the highways authority are only protecting the existing use and proposed residents to ensure a safe pedestrian, cycle and vehicle access to the village. The proposed development will increase larger service vehicles which will add to the potential conflict, therefore a well thought out design, considering the impact on the surrounding network is required.

LATE REPRESENTATION

Appendix B – E-mail from Roland Close assisting with inclusion of land at Grovesend Farm

Jacobs, Claire

From: Banks, Samantha
Sent: 03 March 2020 14:47
To: Banks, Samantha
Subject: FW: Grovesend Farm

Importance: High

From: Close, Roland <rclose@herefordshire.gov.uk>
Sent: 16 June 2017 11:36
To: [REDACTED]
Cc: K Davis - Colwall Parish Council <cpcclerk@colwall.org.uk> (cpcclerk@colwall.org.uk) <cpcclerk@colwall.org.uk>; Evans, Bruce <bje@herefordshire.gov.uk>; Banks, Samantha <sbanks@herefordshire.gov.uk>; Tookey-Williams, Jill <Jill.Tookey-Williams@herefordshire.gov.uk>; Thomas, Edward <ethomas@herefordshire.gov.uk>
Subject: Grovesend Farm
Importance: High

I had a productive meeting with Bruce Evans in our highways section today.

Essentially when I drilled down Bruce's residual concern is pedestrian connectivity / safety.

However, we agreed that we think you could allocate the site at Grovesend Farm for the provision of up to 37 dwellinghouses. We think it is essential that within the policy you should have wording that says something like:-

"...subject to the provision of a safe and suitably surfaced (suitable for all seasons of the year) pedestrian link or links to the amenities and facilities of Colwall Village."

Moving on – **confidentially** the issue / risk (*minimal perhaps*), in my mind, is whether someone may object or challenge that policy claiming that the site is not available and deliverable on the basis that such links have no realistic prospect of being delivered. It appears to me that if I were a potential developer I would explore:-

- a) Providing a 2m footway along Old Church Road / C1165 from any proposed means of vehicle access to Stone Drive (U66612) – *it appears that this would need obtaining land from 'Pembroke Lodge'; and / or*
- b) Providing a footway link to Stone Close (U66613) in that gap between numbers 5 & 6; and / or
- c) Surfacing in an appropriate material public footpath CW30 from the site to the 'Thai Rama site' together with provision of pedestrian footbridge over the brook and the re-surfacing in an appropriate material of public footpaths CW30A and CW30B connecting to 'The Crescent'. *I am unclear from a legal point of view if a developer paid monies to the LPA to undertake such works whether the Highway Authority can undertake such works without the consent of the landowner(s). You may wish to ask Andy Byng and our colleagues in public rights of way that question.*

I have copied Bruce into this e-mail. No doubt if he does not agree that the content represents an accurate account of the position he will let us know.

I have also copied in Sam Banks.

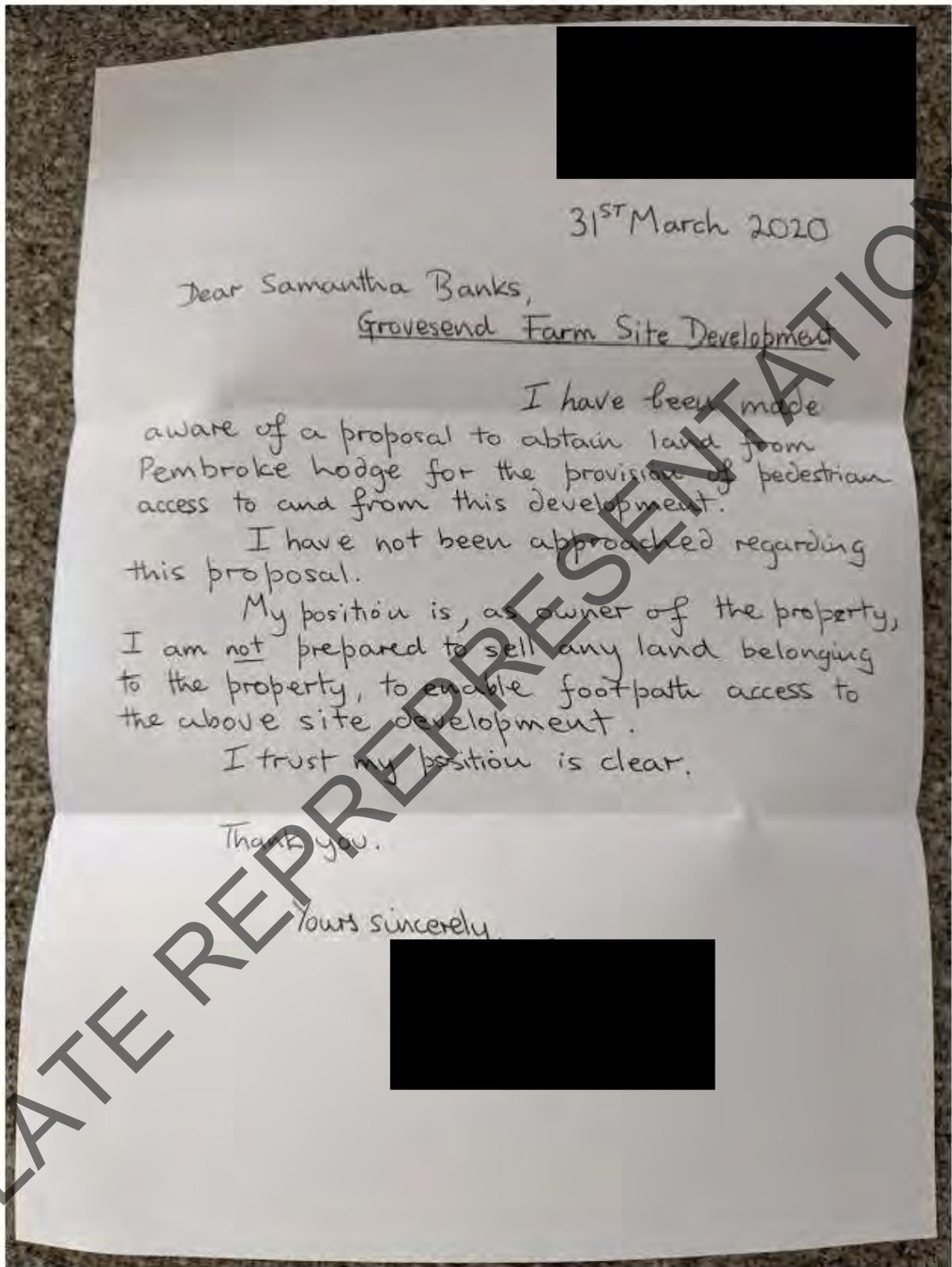
Hopefully this may assist in "unlocking" the dilemma re: how to accommodate the housing numbers required in your emerging NDP.

Regards

Roland Close

Principal Planning Officer

Appendix C – Letter from the owner of Pembroke Lodge



31ST March 2020

Dear Samantha Banks,
Grovesend Farm Site Development

I have been made aware of a proposal to obtain land from Pembroke Lodge for the provision of pedestrian access to and from this development.

I have not been approached regarding this proposal.

My position is, as owner of the property, I am not prepared to sell any land belonging to the property, to enable footpath access to the above site development.

I trust my position is clear.

Thank you.

Yours sincerely

Appendix D – Joint letter from the owners of REDACTED

Ms Samantha Banks
Neighbourhood Planning Manager
Neighbourhood Planning Team
Environment and Place Directorate
Herefordshire Council
Plough Lane
Hereford
HR4 0LE

31 March 2020

Tel: 01432 261576

Email: sbanks@herefordshire.gov.uk
www.herefordshire.gov.uk/neighbourhoodplanning
bje@herefordshire.gov.uk

Dear Ms Banks,

We are writing this joint letter to you having just received a copy of an email from Roland Close (former Principal Planning Officer of Hereford County Council) of 16 June 2017 which was obtained under the Freedom of Information Act. The name of the recipient has been redacted but a list of other recipients and text in the body of the email indicate that it was sent to John Stock, Chairman of the Colwall Parish Planning Committee and author/compiler of the Colwall Parish Neighbourhood Development Plan (NDP). Close's email (copy attached) is important as it states what will be required should development of housing on Grovesend field be included in the Colwall NDP, viz:

- a. Providing a 2m footway along Old Church Road / C1165 from any proposed means of vehicle access to Stone Drive (U66612) - *it appears that this would need obtaining land from 'Pembroke Lodge'; and / or*
- b. Providing a footway link to Stone Close (U66613) in that gap between numbers 5 & 6; and / or
- c. Surfacing in an appropriate material public footpath CW30 from the site to the Thai Rama site' together with provision of pedestrian footbridge over the brook and the re-surfacing in an appropriate material of public footpaths CW30A and CW30B connecting to 'The Crescent'.

It is clear from this document that the development of Grovesend Field is totally dependent on the provision of pedestrian access to the Grovesend site as laid out in points a) to c) above yet none of the details of such access were published.

This letter concerns only point b). My wife and I are the owners of REDACTED; Messrs Colin and Jeffrey Neville are the owners of REDACTED and this letter expresses our joint views on point b) which we reject as it will have an unacceptable impact on residential amenity.

We wish to make the following points:

- 1) The email from Close is dated 16 June 2017. Since then we have received no indication from the planning committees of either Colwall Parish Council or Hereford County Council that a substantial parcel of private property held by numbers 5 & 6 Stone Close may be required for the provision of pedestrian access to Grovesend Field. There is scant reference to these point in the current draft of the Colwall NDP.

- 2) We hereby state categorically that such a requirement does not have the consent of either the Bridges or the Neville families.
- 3) Furthermore, the basic premise of point b) in Close's email is wrong. There is no gap between numbers 5 & 6 Stone Close. Figure 1 below (an extract from H.M. Land Registry – Title No. HE1504) shows that numbers 5 & 6 share a common boundary – 6 Stone Close is outlined in red. There is a space between the two houses but most of this is taken up by a drive which is the only access to 6 Stone Close.



Figure 1 Extract from H.M. Land Registry – Title No. HE1504

- 4) The edge of the drive lies less than a metre north of the common boundary to the two properties. The drive is narrow (3 metres on average) and any encroachment on the drive will impede vehicular access to 6 Stone Close – see Figure 2 below. This is unacceptable.



Figure 2. Photograph looking west along the drive to 6 Stone Close

- 5) Because of 5) above any pedestrian pathway will have to be within the land belonging to 5 Stone Close. It will also require two-metre high fences on either side of the path to maintain privacy for each property. A 2m-wide pedestrian walkway will have an overall footprint of up to 3 metres, once appropriate fencing is put in place. This will be an eyesore and will have an unacceptable impact on the residential amenity of Stone Close and the financial value of the two properties.



Figure 3. Photograph looking south from 6 Stone Close to 5 Stone Close

- 6) The space between the property boundary to No. 6 Stone Close and the nearest point of the house at 5 Stone Close is just over 4 metres meaning that the fence securing the privacy of

no. 5 Stone Close will be just over 1 metre away from the house. This is also unacceptable and raises a series of other problems with visual intrusion, loss of light, privacy, noise, etc.

On a separate matter, we are also deeply concerned that after all this time and despite several requests which produced no response, we have only received this information the day after consultation on the Colwall NDP closed. If I had known last week what I do today I would have included the above in my recent email to you.

Consequently, even though this letter has been written after the final date for responses to the Colwall NDP we expect you to include it in the responses. Please let us know if this is not the case.

We look forward to hearing from you

Your sincerely,

Hard copy signed and posted

Peter and Valda Bridges

Messrs Colin and Jeffrey Neville

LATE REPRESENTATION

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 18 March 2020 16:11
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Geoff
Last name	Standland
Which plan are you commenting on?	Colwall NDP
Comment type	Objection
Your comments	<p>Grovesend Field • We object to inclusion of Grovesend Field within the Colwall NDP; • Grovesend Field is of historic importance to Colwall with the remains of Colwall's industrial heritage in the southern section and is bordered by listed buildings to the north; • Grovesend Field has poor access, meaning increased traffic will impact on Stone drive, Old Church Road, Oak drive, and awkward junctions with Mathon Road and Walwyne Road. Old Church Road is narrow and lacks pavement, making future residents of any development less likely to walk to the village, and the ongoing safety of current pedestrian users is also a concern. Mill Lane • We strongly support inclusion of The Mill Lane site in the Colwall NDP as the Mill lane site provides a safe and more sustainable option, with excellent pedestrian access to key amenities including the school, village hall, scout hut, village shops and public transport on Walwyn Road / the station. Any vehicle traffic accesses Walwyn Road directly, via a well-designed junction with excellent sight lines.</p>

Latham, James

From: Graham Pile
Sent: 26 March 2020 10:59
To: Neighbourhood Planning Team
Subject: Colwall NDP

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.

Reference – COLWALL NEIGHBOURHOOD DEVELOPMENT PLAN

We **object** to the Colwall Neighbourhood Development Plan for the following reasons

The current Plan includes the use of Grovesend Farm land for housing development which is against the wishes of and the objections of very many residents of the Parish.

There is now an application for housing development in Mill Lane, Colwall for a similar number of dwellings, which has regrettably been objected to by the Parish Council. This, however, is a far better development site than Grovesend for a number of reasons including Access and Safety of Access, both pedestrian and vehicle, plus its position, being adjacent to the Primary School and other village amenities. There is also considerable support for the Mill Lane site from the residents of Colwall.

One of the other objections to Mill Lane was the view from The Malvern Hills. BOTH sites (Mill Lane and Grovesend) are equally visible from the Hills, therefore this objection by the Parish Council does not appear to be valid.

In view of the need to develop the village the Plan must take into account the wishes and needs of the Villagers as well as the need to offer new dwellings in the best locations to increase the population of the village, therefore Mill Lane is a far more preferable location.

Graham & Yvonne Pile

26 March 2020

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 27 March 2020 10:45
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Heather
Last name	Fryer
Which plan are you commenting on?	Colwall NDP
Comment type	Objection
Your comments	<p>Whilst I am agreement with the concept of having an NDP and the need to meet the minimum housing growth targets – as we are in a protected AONB, I do not support the current recommendations of the latest draft plan. In particular I do not believe the process in the selection of sites for housing development reflects the strength of evidence and majority of consultation respondent feedback is not reflected in the draft plan. I have followed and supported the preferred process of attending and listening to plan authors and contributors and provided appropriate evidence, feedback and challenge in a timely fashion and when requested through the various development stages since 2013. However, I have been frustrated that my comments and those of the majority of respondents has not been considered and acted upon during these consultation process and stages. So I would like to formally challenge the current NDP process and design finalisation recommendations in a number of areas: • I do not believe the LSCA has been developed consistently and it should not be the only consideration in determining sites for Housing development. It has also changed over time without detailed explanation or in consultation with village residents. As a consequence Grovesend Field is included as a site for development in the latest plan even though it was excluded in</p>

earlier versions and the Mill Lane site area which was considered suitable for development in earlier plans has now been excluded. • A recent application for appropriate development on Mill Lane has been very strongly supported by a clear majority of village respondents – yet the Parish Council have rejected the application and excluded it as an option in the NDP. This happened even though a well constructed and appropriately designed proposal was formally submitted before the draft NDP was finalised and within 2 days of the Draft NDP being formally shared at the Colwall Village Hall. • Other key studies and documents such as Herefordshire Council’s own SHLAA recommendations and the English Heritage confirmation of the Colwall Conservation Area which highlighted Grovesend Field as a protected open space and the ‘green lung’ of the village do not seem to have been given the same consideration. • No landscape impact assessment has been completed for the Grovesend field development • In all meetings and feedback the vast majority of respondents have provided feedback regarding the importance of highways, access and infrastructure in choosing sites for development. This does not seem to be considered in the draft plan recommendations with particular regard to the lack of suitability of Old Church Road to support future development • The draft plan does not offer alternative housing development options and sites for the village residents to provide feedback on and ultimately vote upon. During the process there have always been options available including A. The Mill Lane site, location near to services and highways links has much greater suitability for potential development B. A higher assumption on infill development. Recent average new house infill developments have been significantly higher than the projected average included in the plan. These developments are spread across the village and with appropriate planning could ensure diverse development and less pressure on particular locations and roads of bigger housing developments. A number of these 1 or few house development applications have been rejected by the PC when they could have contributed to the Plans housing targets. Both sites are fields within the AONB, and

both are clearly visible from the Malvern Hills. However:

- Grovesend Field is within the Colwall Conservation Area and should be awarded greater protection;
- Grovesend Field is of historical importance to Colwall with the remains of Colwall's industrial heritage in the southern section and is bordered by listed buildings to the north;
- Grovesend Field has poor access, meaning increased traffic will impact on Stone Drive, Old Church Road, Oak Drive, and the awkward junctions with Mathon Road and Walwyn Road. Old Church Road is narrow and lacks a pavement, making future residents of any development less likely to walk to the village, and the ongoing safety of current pedestrian users is also a concern.
- The Mill Lane site provides a safer and more sustainable option, with excellent pedestrian access to key amenities including the school, village hall, scout hut, village shops and public transport on Walwyn Road / the station. Any vehicle traffic accesses Walwyn Road directly, via a well designed junction with excellent sight lines.



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

via Email:

neighbourhoodplanning@herefordshire.gov.uk

Adrian Chadha
Assistant Spatial Planner
Highways England
The Cube
199 Wharfside Street
Birmingham B1 1RN

24 March 2020

Dear James,

CONSULTATION ON THE SUBMISSION VERSION OF THE COLWALL NEIGHBOURHOOD PLAN

Highways England welcomes the opportunity to comment on the submission version of the Colwall Neighbourhood Plan which covers the period 2011 to 2031 and has been produced for public consultation. We note that the document provides a vision for the future of the area and sets out a number of key objectives and planning policies which will be used to help determine planning applications.

Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Colwall Neighbourhood Plan, our principal concern is safeguarding the operation of the M50 Motorway, which is approximately 4 miles south of the parish.

We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Plan for Colwall is required to be in conformity with the current Herefordshire Council Local Plan (2011-2031) and this is acknowledged within the document.

It is understood that, by applying the required 14% growth target, a total allocation of 160 new dwellings has been assigned to Colwall Parish for the period up to 2031 (or 176, if including a 10% spare capacity). It is noted that 106 of these have already been



completed or are part of committed developments. As such, assuming maximum impact on the SRN, an additional 70 dwellings should be developed in the area by 2031.

Due to the low level of development proposed for the area and the distance of the parish from the SRN, it is not expected that the policies set out in the Colwall Neighbourhood Development Plan will have any impact on the operation of the SRN. As such, Highways England have no objections to the arrangements proposed.

We have no further comments to provide and trust that the above is useful in the progression of the Colwall Neighbourhood Plan.

Yours Sincerely,

A. Chadha

Adrian Chadha
Spatial Planning & Economic Development Team
Email: Adrian.Chadha@highwaysengland.co.uk



Historic England

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

Direct Dial: 0121 625 6887

Our ref: PL00302642

13 March 2020

Dear Mr Latham

COLWALL NEIGHBOURHOOD PLAN - REGULATION 16 CONSULTATION.

Thank you for the invitation to comment on the Submission Neighbourhood Plan. We are pleased to note that our suggestions at Regulation 14 stage have been taken into account and note that our other comments on the Regulation 14 Plan remain entirely relevant, that is:

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

The emphasis on the conservation of local distinctiveness and the protection of the built environment and rural landscape character including important views is highly commendable. We also commend the approaches taken in the Plan to ensuring that the design of new development takes cues from the local vernacular, thus reinforcing local distinctiveness and contributing to the conservation and enhancement of the historic environment.

We note that the selection of sites with the potential for new housing development has been positively guided by considerable research including the Village Design Statement (2001) and the Landscape Assessment and associated stage 2 Landscape Sensitivity and Capacity Assessment (Tinkler 2013). This and other documentation produced by the Malvern Hills AONB provides a very thorough evidence base for the policies and proposals put forward.

It is also clear that specific policies for individual development sites provide for thorough mitigation against potentially adverse impacts upon the rural and built environment including heritage assets and the Colwall conservation area.

The consideration of development outside the Development Boundary within the rural environs of Colwall is equally well thought through and well analysed and the detailed policies seeking to ensure the retention and sensitive conversion of historic farmsteads are particularly welcomed”.

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



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6888
HistoricEngland.org.uk





Historic England

I hope you find this advice helpful.

Yours sincerely,

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

cc:



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6888
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.

[REDACTED]

19 March 2020

Neighbourhood Planning Team
Planning Services
P O Box 4
HEREFORD
HR1 2ZB



Dear Sir / Madam

COLWALL NEIGHBOURHOOD DEVELOPMENT PLAN

I understand that Herefordshire Council is currently considering the draft Colwall NDP and you are seeking views in relation to its improvement from local residents.

I am concerned that the current draft plan includes a possible development at Grovesend Field off Old Church Road, Colwall but excludes building on a site in Mill Lane, Colwall close to the Colwall Primary School. This was an option considered by your Council in past years and the subject of a prepared planning application submitted recently.

I believe it is important that the Colwall NDP should include the Mill Lane, Colwall development for the following reasons;

- Grovesend Field is within the Colwall Conservation Area and should be awarded conservation status and is of historical and industrial heritage importance as well as bordered to the north by listed buildings
- Grovesend Field has poor road access, is narrow and lacking a pavement so pedestrian journeys to the village centre will be hampered and car traffic correspondingly increased
- The Mill Lane site is a better in terms of safety, pedestrian access to local facilities, and offers an opportunity for much needed affordable housing which is so important to the well being and social balance of the Colwall community.

I very much hope your current consultation on the Colwall NDP will take these comments into consideration such that the Mill Lane site is included and the Grovesend Field is removed.

Yours faithfully

[REDACTED]
I K H Baker

From: donotreply@herefordshire.gov.uk
Sent: 27 March 2020 20:25
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Isabel
Last name	Mather
Which plan are you commenting on?	Colwall Regulation 16 Draft NDP
Comment type	Objection
Your comments	<p>Dear Neighbourhood Planning Team, Please find my individual commentary regarding the request for feedback on the latest draft of the Colwall NDP. Whilst I am agreement with the concept of having an NDP and the need to meet the minimum housing growth targets – as we are in a protected AONB, I am objecting to the current recommendations of the latest draft plan. In particular I do not believe the process in the selection of sites for housing development reflects the strength of evidence and majority of consultation respondent feedback is not reflected in the draft plan. I have followed and supported the preferred process of attending and listening to plan authors and contributors and provided appropriate evidence, feedback and challenge in a timely fashion and when requested through the various development stages since 2013. However, I have been frustrated that my comments and those of the majority of respondents has not been considered and acted upon during these consultation process and stages. So I would like to formally challenge the current NDP process and design finalisation recommendations in a number of areas: • I do not believe the LSCA has been developed consistently and it should not be the only consideration in determining sites for Housing development. It has also changed over time without detailed explanation or in consultation with village</p>

residents. As a consequence Grovesend Field is included as a site for development in the latest plan even though it was excluded in earlier versions and the Mill Lane site area which was considered suitable for development in earlier plans has now been excluded. • A recent application for appropriate development on Mill Lane has been very strongly supported by a clear majority of village respondents – yet the Parish Council have rejected the application and excluded it as an option in the NDP. This happened even though a well constructed and appropriately designed proposal was formally submitted before the draft NDP was finalised and within 2 days of the Draft NDP being formally shared at the Colwall Village Hall. • Other key studies and documents such as Herefordshire Council’s own SHLAA recommendations and the English Heritage confirmation of the Colwall Conservation Area which highlighted Grovesend Field as a protected open space and the ‘green lung’ of the village do not seem to have been given the same consideration. • No landscape impact assessment has been completed for the Grovesend field development • In all village NDP discussion meetings and feedback the vast majority of respondents have provided feedback regarding the importance of highways, access and infrastructure in choosing sites for development. This does not seem to be considered in the draft plan recommendations with particular regard to the lack of suitability of Old Church Road to support future development • The draft plan does not offer alternative housing development options and sites for the village residents to provide feedback on and ultimately vote upon. During the process there have always been options available including A. The Mill Lane site, location near to services and highways links has much greater suitability for potential development B. A higher assumption on infill development. Recent average new house infill developments have been significantly higher than the projected average included in the plan. These developments are spread across the village and with appropriate planning could ensure diverse development and less pressure on particular locations and roads of bigger housing developments. A number of these 1

or few house development applications have been rejected by the PC when they could have contributed to the Plans housing targets. Both sites are fields within the AONB, and both are clearly visible from the Malvern Hills. However:

- Grovesend Field is within the Colwall Conservation Area and should be awarded greater protection;
- Grovesend Field is of historical importance to Colwall with the remains of Colwall's industrial heritage in the southern section and is bordered by listed buildings to the north;
- Grovesend Field has poor access, meaning increased traffic will impact on Stone Drive, Old Church Road, Oak Drive, and the awkward junctions with Mathon Road and Walwyn Road. Old Church Road is narrow and lacks a pavement, making future residents of any development less likely to walk to the village, and the ongoing safety of current pedestrian users is also a concern.
- The Mill Lane site provides a safer and more sustainable option, with excellent pedestrian access to key amenities including the school, village hall, scout hut, village shops and public transport on Walwyn Road / the station. Any vehicle traffic accesses Walwyn Road directly, via a well designed junction with excellent sight lines. I would be very happy to provide any additional info on request

Regards Miss Isabel Mather

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 27 March 2020 18:11
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Janet
Last name	Bartlett
Which plan are you commenting on?	Colwall Neighbourhood Development Plan (NDP)
Comment type	Objection
Your comments	I can see no specific changes in the Colwall area that could justify changing the suitability of the Mill Lane site. It has not changed - just some person/people's opinions. Could not some common sense come into both the Parish and County Council actions regarding planning. All the objections raised to the Grovesend field in the past remain the same - is the designation ANOB apparently now worthless? - and most people can see absolutely no change to the advantages of the Mill Lane site. I strongly object to this current draft plan.

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 22 March 2020 06:49
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	julian
Last name	beard
Which plan are you commenting on?	Grovesend Field 37houses
Comment type	Objection
Your comments	Vehicle and pedestrian access totally unsuitable for development of this size .

From: donotreply@herefordshire.gov.uk
Sent: 27 March 2020 14:06
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Jennifer
Last name	Cooke
Which plan are you commenting on?	Colwall Regulation 16 plan stage
Comment type	Objection
Your comments	<p>Colwall Neighbourhood Plan Regulation 16 plan stage. The current draft plan includes Grovesend Field, off Old Church Road and is earmarked for 37 dwellings. The Mill Lane site which has a planning application being considered at the moment for 37 dwellings is not even being considered for inclusion in the NDP but is a much more logical option for this amount of building, producing a lot less disruption within the village during construction and on completion. This seriously needs further consideration.</p> <p>Colwall Neighbourhood Plan Regulation 16 plan stage. The current draft plan includes Grovesend Field, off Old Church Road and is earmarked for 37 dwellings. The Mill Lane site which has a planning application being considered at the moment for 37 dwellings is not even being considered for inclusion in the NDP but is a much more logical option for this amount of building, producing a lot less disruption within the village during construction and on completion. This seriously needs further consideration.</p> <p>Colwall Neighbourhood Plan Regulation 16 plan stage. The current draft plan includes Grovesend Field, off Old Church Road and is earmarked for 37 dwellings. The Mill Lane site which has a planning application being considered at the moment for 37 dwellings is not even being considered for inclusion in the NDP but is a much more logical option for</p>

	<p>this amount of building, producing a lot less disruption within the village during construction and on completion. This seriously needs further consideration.</p>
--	---

Latham, James

From: margaret harris
Sent: 25 March 2020 17:22
To: Neighbourhood Planning Team
Cc: margaret harris
Subject: Fw: Grovesend Field and Mill Lane Field

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From: margaret harris
Sent: 25 March 2020 17:11
To: neighbourhoodplanning@herefordshire.gov.uk <neighbourhoodplanning@herefordshire.gov.uk>
Cc: margaret harris
Subject: Grovesend Field and Mill Lane Field

From: Dr J Hutton

Date: 23 -3 2020

1. AONB Both sites are fields, clearly visible from the Malvern Hills, hence any development will adversely impact the setting of the village, the interface with open countryside and wildlife.
2. EXISTING ROADS Old Church Road will become more dangerous to pedestrians, cyclists and cars. The narrow roads from St James Church direction will not easily accommodate greater traffic flow with any degree of safety.
3. PROXIMITY TO LISTED BUILDINGS AND INDUSTRIAL HERITAGE This clearly would be detrimental to the Grovesend Field site.
4. POSSIBLE DEVELOPMENT I am not convinced that development needs to occur at EITHER of these two sites, and certainly deciding at this time of economic uncertainty, when we are in the grip of a pandemic, is a leap into the unknown.
5. PRIORITY If a decision must be made then amend the NDP to include the site in Mill Lane by the school and delete Grovesend Field. But recognise that further expansion into open countryside will irrevocably damage Colwall in perpetuity. We do NOT need both sites developed.

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 27 March 2020 20:27
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Jonathan
Last name	Mather
Which plan are you commenting on?	Colwall Regulation 16 Draft NDP
Comment type	Objection
Your comments	<p>Dear Neighbourhood Planning Team, Please find my individual commentary regarding the request for feedback on the latest draft of the Colwall NDP. Whilst I am agreement with the concept of having an NDP and the need to meet the minimum housing growth targets – as we are in a protected AONB, I am objecting to the current recommendations of the latest draft plan. In particular I do not believe the process in the selection of sites for housing development reflects the strength of evidence and majority of consultation respondent feedback is not reflected in the draft plan. I have followed and supported the preferred process of attending and listening to plan authors and contributors and provided appropriate evidence, feedback and challenge in a timely fashion and when requested through the various development stages since 2013. However, I have been frustrated that my comments and those of the majority of respondents has not been considered and acted upon during these consultation process and stages. So I would like to formally challenge the current NDP process and design finalisation recommendations in a number of areas: • I do not believe the LSCA has been developed consistently and it should not be the only consideration in determining sites for Housing development. It has also changed over time without detailed explanation or in consultation with village</p>

residents. As a consequence Grovesend Field is included as a site for development in the latest plan even though it was excluded in earlier versions and the Mill Lane site area which was considered suitable for development in earlier plans has now been excluded. • A recent application for appropriate development on Mill Lane has been very strongly supported by a clear majority of village respondents – yet the Parish Council have rejected the application and excluded it as an option in the NDP. This happened even though a well constructed and appropriately designed proposal was formally submitted before the draft NDP was finalised and within 2 days of the Draft NDP being formally shared at the Colwall Village Hall. • Other key studies and documents such as Herefordshire Council’s own SHLAA recommendations and the English Heritage confirmation of the Colwall Conservation Area which highlighted Grovesend Field as a protected open space and the ‘green lung’ of the village do not seem to have been given the same consideration. • No landscape impact assessment has been completed for the Grovesend field development • In all village NDP discussion meetings and feedback the vast majority of respondents have provided feedback regarding the importance of highways, access and infrastructure in choosing sites for development. This does not seem to be considered in the draft plan recommendations with particular regard to the lack of suitability of Old Church Road to support future development • The draft plan does not offer alternative housing development options and sites for the village residents to provide feedback on and ultimately vote upon. During the process there have always been options available including A. The Mill Lane site, location near to services and highways links has much greater suitability for potential development B. A higher assumption on infill development. Recent average new house infill developments have been significantly higher than the projected average included in the plan. These developments are spread across the village and with appropriate planning could ensure diverse development and less pressure on particular locations and roads of bigger housing developments. A number of these 1

or few house development applications have been rejected by the PC when they could have contributed to the Plans housing targets. Both sites are fields within the AONB, and both are clearly visible from the Malvern Hills. However:

- Grovesend Field is within the Colwall Conservation Area and should be awarded greater protection;
- Grovesend Field is of historical importance to Colwall with the remains of Colwall's industrial heritage in the southern section and is bordered by listed buildings to the north;
- Grovesend Field has poor access, meaning increased traffic will impact on Stone Drive, Old Church Road, Oak Drive, and the awkward junctions with Mathon Road and Walwyn Road. Old Church Road is narrow and lacks a pavement, making future residents of any development less likely to walk to the village, and the ongoing safety of current pedestrian users is also a concern.
- The Mill Lane site provides a safer and more sustainable option, with excellent pedestrian access to key amenities including the school, village hall, scout hut, village shops and public transport on Walwyn Road / the station. Any vehicle traffic accesses Walwyn Road directly, via a well designed junction with excellent sight lines. I would be very happy to provide any additional info on request

Regards Mr Jonathan Mather

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 27 March 2020 21:32
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	James
Last name	Rose
Which plan are you commenting on?	Colwall development plan - NDP
Comment type	Objection
Your comments	<p>I object to the draft NDP as I believe it does not represent the right way for the village to develop. The use of land off Old Church Road seems to ignore the concerns repeatedly raised in Colwall about the suitability of access down narrow roads with poor junctions, and a lot of parked cars which restrict Stone Drive and can cause issues. For example, Colwall residents already use stone drive to access/park when visiting the pharmacy, post office and doctors surgery. The road simply can't cope with any more traffic without it becoming unnecessarily dangerous as parked cars already block half the carriage way. The value of Grovesend Field in the Colwall Conservation area does not seem to have been respected, and decisions have been made that go directly against the will of the village when consultation on land for development has been held. The approach to develop houses alongside the school at Mill Lane, which had good acceptance and agreement in the village, seems to be dropped for reasons that do not make sense.</p>

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 27 March 2020 20:49
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Dr James
Last name	Mather
Which plan are you commenting on?	Colwall Regulation 16 Draft NDP
Comment type	Objection
Your comments	<p>Dear Neighbourhood Planning Team, Please find my individual commentary regarding the request for feedback on the latest draft of the Colwall NDP. Whilst I am agreement with the concept of having an NDP and the need to meet the minimum housing growth targets – as we are in a protected AONB, I am objecting to the current recommendations of the latest draft plan. In particular I do not believe the process in the selection of sites for housing development reflects the strength of evidence and majority of consultation respondent feedback is not reflected in the draft plan. I have followed and supported the preferred process of attending and listening to plan authors and contributors and provided appropriate evidence, feedback and challenge in a timely fashion and when requested through the various development stages since 2013. However, I have been frustrated that my comments and those of the majority of respondents has not been considered and acted upon during these consultation process and stages. So I would like to formally challenge the current NDP process and design finalisation recommendations in a number of areas: • I do not believe the LSCA has been developed consistently and it should not be the only consideration in determining sites for Housing development. It has also changed over time without detailed explanation or in consultation with village</p>

residents. As a consequence Grovesend Field is included as a site for development in the latest plan even though it was excluded in earlier versions and the Mill Lane site area which was considered suitable for development in earlier plans has now been excluded. • A recent application for appropriate development on Mill Lane has been very strongly supported by a clear majority of village respondents – yet the Parish Council have rejected the application and excluded it as an option in the NDP. This happened even though a well constructed and appropriately designed proposal was formally submitted before the draft NDP was finalised and within 2 days of the Draft NDP being formally shared at the Colwall Village Hall. • Other key studies and documents such as Herefordshire Council’s own SHLAA recommendations and the English Heritage confirmation of the Colwall Conservation Area which highlighted Grovesend Field as a protected open space and the ‘green lung’ of the village do not seem to have been given the same consideration. • No landscape impact assessment has been completed for the Grovesend field development • In all village NDP discussion meetings and feedback the vast majority of respondents have provided feedback regarding the importance of highways, access and infrastructure in choosing sites for development. This does not seem to be considered in the draft plan recommendations with particular regard to the lack of suitability of Old Church Road to support future development • The draft plan does not offer alternative housing development options and sites for the village residents to provide feedback on and ultimately vote upon. During the process there have always been options available including A. The Mill Lane site, location near to services and highways links has much greater suitability for potential development B. A higher assumption on infill development. Recent average new house infill developments have been significantly higher than the projected average included in the plan. These developments are spread across the village and with appropriate planning could ensure diverse development and less pressure on particular locations and roads of bigger housing developments. A number of these 1

or few house development applications have been rejected by the PC when they could have contributed to the Plans housing targets. Both sites are fields within the AONB, and both are clearly visible from the Malvern Hills. However:

- Grovesend Field is within the Colwall Conservation Area and should be awarded greater protection;
- Grovesend Field is of historical importance to Colwall with the remains of Colwall's industrial heritage in the southern section and is bordered by listed buildings to the north;
- Grovesend Field has poor access, meaning increased traffic will impact on Stone Drive, Old Church Road, Oak Drive, and the awkward junctions with Mathon Road and Walwyn Road. Old Church Road is narrow and lacks a pavement, making future residents of any development less likely to walk to the village, and the ongoing safety of current pedestrian users is also a concern.
- The Mill Lane site provides a safer and more sustainable option, with excellent pedestrian access to key amenities including the school, village hall, scout hut, village shops and public transport on Walwyn Road / the station. Any vehicle traffic accesses Walwyn Road directly, via a well designed junction with excellent sight lines. I would be very happy to provide any additional info on request

Regards Dr James Mather

Monday 9th March

Reg 16 Consultation on Colwall NDP

There are certain changes that I feel should be made to the proposed Colwall NDP

Namely the field adjoining the school should be included and Grovesend field should be excluded.

At the moment there is a planning application to build 37 houses next to the village school. Carl Brace has said that he will not support this application based on Landscape issues.

The landscape assessment and categorisation is based on the views of one person, Carly Tinkler, in the LSCA document. This person has over time dramatically altered the categories for both Mill Lane and Grovesend field. She at first had Mill Lane in a category where you can build and Grovesend field in one where you shouldn't. This in fact fitted in with Herefordshire's own assessment in their 2012 and 2015 SHLAA.

She then reversed this and the new categories were then used to help justify excluding the Mill Lane site and including Grovesend Field.

I object to the fact that the village was not consulted on the designation of the fields in question and were not given the chance to express their feelings. We were told that this was how it had to be.

Despite the overwhelming opposition to these changes at the regulation 14 stage the views of the villagers were completely ignored.

The Herefordshire landscape officer rejects the Mill Lane site because of it being within the AONB and the landscape issues in the LSCA.

When the time comes will he also reject the Grovesend site? I say this because not only is it in the AONB but

- 1 it is also within the Colwall Conservation area
- 2 It has listed houses adjoining it on the north
- 3 It is outside the settlement boundary
- 4 It contains the remains of part of Colwall's industrial heritage in the southern section.

His second point against the Mill Lane site is that it is not linked to any existing residential development. He seems to be unaware that there are three houses being built opposite the site and the school runs down the eastern boundary. On the northern boundary there is the new development called Colwall Orchards.

The landscape officer also says that the Mill Lane site is "contrary to the ambitions of the local community as set out in the draft Colwall NDP

WRONG

The village has had no input into the site selection and any concerns they have had have been swept aside. At the moment the NDP should not be taken as a planning document until it has been approved at the referendum stage.

However I do accept the need for housing but I do not feel that Grovesend Field will satisfy that need. There are a number of serious issues with this site.

In the past Herefordshire Council have turned down proposals to include Grovesend Field in the settlement boundary because of AONB and the very poor access. Old Church road itself is very narrow meaning that driveways often have to be used to enable vehicles to pass each other. In other sections cars have to reverse for 50 yards because there are no passing places.

Having lived on the junction of Stone Drive and Old Church road for over 30 years I am aware of how many vehicles will use Stone Drive to access the village shops, the school, the station and the bus stop. Stone Drive is already the most congested road in the village with a very blind junction to Old Church Road. This will make a bad situation very much worse.

We have been told that any developer would have to provide safe pedestrian access from the site to the village. There is no footpath and pedestrians leaving the site would be on a lane too narrow to include one. Will there be compulsory purchase of gardens to provide for a footpath? This becomes even more difficult as all of the tall trees on the Burleigh side of the road and possibly the Grovesend side also have TPO orders on them.

The site itself has further challenges with the listed buildings that are adjoining the field and certain restrictive covenants.

The Mill Lane site has none of these problems and benefits from easy access to the main road that runs through the village.

I do not believe that the Grovesend site is deliverable as a solution to Colwall's housing needs.

I am sure that if the village was to be given the choice of developing the Mill Lane site or Grovesend Field then Mill Lane would be overwhelmingly supported as a site for housing. I say this not just from the results of the consultations in 2015 and 2018 but also from listening to other local residents.

Many, many people do not understand why the opinions of the villagers appear to count for nothing.

What should happen is for the proposed NDP to be changed to include the field by the school in Mill Lane and exclude Grovesend Field.

Thank you for considering these points,

Kathleen Beard

Latham, James

From: Keith Fairburn
Sent: 23 March 2020 13:35
To: Neighbourhood Planning Team
Subject: Planning for Grovesend field and Mill Lane in Colwall

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.

The proposed development of Grovesend field is absolutely ridiculous. As is further Development in Colwall. The Schweppes site has not been finished. Why not???

The Grovesend field has no amenities/ sewage, electricity, water and gas, which are all in short supply in the village as a whole .ie power cuts and sewage overflows. Sewage plant needs up grading. Better amenities need to be addressed before any further development.

To do any sort of development in Grovesend field the area around it would need total development and improvement (paid for by any developer). Where is all the large increase in traffic going to go. Up the hill towards Malvern,or stopped idle at the traffic lights over the bridge (which are unnecessary now). All of which cause pollution There is to much traffic through the village now. The roads are in a terrible state ,so what are they going to be like with more traffic and people. Is it proposed to knock houses down to create access??

Not too say this is an area of outstanding natural beauty which you seem to want to destroy for the sake of greed Developers like green field sites because they are easier to develop. All brown field sites should be developed first.. The Mill lane site would be a better option if there has to be one. This development would create the same problems as Grovesend .

Their has been to much development in the village over the last few years as it is.

Kind regards

Keith Fairburn
Sent from my iPad

Latham, James

From: L & M Ballard
Sent: 12 March 2020 20:17
To: Neighbourhood Planning Team
Subject: Re: Colwall Neighbourhood Plan

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.

To neighbourhood Planning Team

We understand that the question of which site is best for locating a large number of new houses in the area between mill Lane and Old Church Road is being re-examined.

We consider that access for the large number of vehicle movements which are bound to occur from such a large development, must be a very important consideration. The Grovesend Field is bound to need access onto Old Church Rd in the vicinity of the present farm track. This is bound to result in a hazardous junction. The sight line to the east is restricted by existing buildings and to the west the road is single track and also has restricted visibility. There are no pavements on the narrow and windy road between Grovesend and Mill Lane proposed sites which is a very important factor to consider for the safety of pedestrians.

Access for school children will be much safer from houses with access directly onto Mill Lane. With suitable design it would appear to be possible to provide pavement access directly onto Colwall School grounds and on wards to Walwyn Road bus stop. A school bus from there could carry older children on to the senior schools in Malvern or Ledbury without any car use.

We both consider the above to points strongly favor the Mill Lane site to be far the best.

Yours sincerely,

Lyn & Marcia Ballard

Anne Lady Lechmere

Dear Sir,

I would like to protest against
the plans to build in Grovesend Field.

I agree with the four reasons
given in your letter, and that Grovesend
should be given greater protection.

We do not want the Village to be
spread out into adjoining fields, thus
greatly increasing its size.

The site - Mill Lane would be better,
but 37 houses seems a big number.
A smaller number would be better.

Yours faithfully

[Redacted Signature]

DEVELOPMENT CONTROL
31 MAR 2020
To _____
Ack'd _____ File _____

Latham, James

From: Phillip Howells <phowells@ledburytowncouncil.gov.uk>
Sent: 27 March 2020 13:21
To: Neighbourhood Planning Team
Cc: LTC Clerk
Subject: Colwall NDP regulation 16 submission consultation

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.

Hi James

Ledbury Town Council was invited to submit any comments on this consultation by today, March 27th 2020. The draft plan was submitted for consideration to our Economic Development & Planning Committee at our meeting of 12th March 2020 and as Chairman of our own NDP Working Party it was delegated to me to review and make any relevant comment on the committee's behalf.

I've read the plan in detail and apart from noting a few typographical and grammatical errors that I am sure will be corrected in the final version, overall I think it is an excellent and clearly worded document reflecting what I would expect to see from a neighbourhood in a special setting like the Malvern Hills AONB. I thought the landscape assessment and analysis work in particular was very well presented with understandable explanations as to why particular areas of land were identified for different types of development or for no development. Design Guide inclusion in the policies was also very useful and concise.

My main feedback would be on the maps and diagrams which I did not always find that easy to follow or accurately locate some of the smaller diagrams onto the overall NDP area map. I also found some of the keys to the main maps a bit difficult to follow and did not always seem to relate to the information (such as colours and shading) I was seeking to find on the maps. I suggest it would be useful and add to the readability of the plan for the reader looking at it with no advance knowledge of its contents, to do some more clarification work on the diagrams and maps, such as asking some of this category of reader for their thoughts on if and how they could be improved.

Best regards

Phillip

Councillor Phillip Howells
Mayor of Ledbury
phowells@ledburytowncouncil.gov.uk
07802 260906 or 01531 636752

Latham, James

From: Margaret Coates
Sent: 25 March 2020 10:39
To: Neighbourhood Planning Team
Subject: Grovesend field

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.

I wish to state that I think Grovesend field is totally the wrong area for development as the impact on surrounding roads which are narrow with no footpaths, or easy access to the main road . Mill lane is much better area as the access is suitable without impacting on the village.

Please consider our elderly residents already living here.

Thank you Margaret Coates.

Sent from my iPad

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 27 March 2020 16:31
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Michael
Last name	Cooke
Which plan are you commenting on?	Colwall Neighbourhood Plan
Comment type	Objection
Your comments	The Grovesend Field site should not be developed for the following reasons: 1) It's in The Colwall Conservation Area. 2) It has very poor access for vehicles and pedestrians. Stone Drive and Old Church Road can not safely handle the extra traffic. 3) The site on Mill Lane is a much better option for access and also adjacent to the new school.

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 27 March 2020 10:50
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Mark
Last name	Fryer
Which plan are you commenting on?	Colwall NDP
Comment type	Objection
Your comments	<p>Whilst I am agreement with the concept of having an NDP and the need to meet the minimum housing growth targets – as we are in a protected AONB, I do not support the current recommendations of the latest draft plan. In particular I do not believe the process in the selection of sites for housing development reflects the strength of evidence and majority of consultation respondent feedback is not reflected in the draft plan. I have followed and supported the preferred process of attending and listening to plan authors and contributors and provided appropriate evidence, feedback and challenge in a timely fashion and when requested through the various development stages since 2013. However, I have been frustrated that my comments and those of the majority of respondents has not been considered and acted upon during these consultation process and stages. So I would like to formally challenge the current NDP process and design finalisation recommendations in a number of areas: • I do not believe the LSCA has been developed consistently and it should not be the only consideration in determining sites for Housing development. It has also changed over time without detailed explanation or in consultation with village residents. As a consequence Grovesend Field is included as a site for development in the latest plan even though it was excluded in</p>

earlier versions and the Mill Lane site area which was considered suitable for development in earlier plans has now been excluded. • A recent application for appropriate development on Mill Lane has been very strongly supported by a clear majority of village respondents – yet the Parish Council have rejected the application and excluded it as an option in the NDP. This happened even though a well constructed and appropriately designed proposal was formally submitted before the draft NDP was finalised and within 2 days of the Draft NDP being formally shared at the Colwall Village Hall. • Other key studies and documents such as Herefordshire Council’s own SHLAA recommendations and the English Heritage confirmation of the Colwall Conservation Area which highlighted Grovesend Field as a protected open space and the ‘green lung’ of the village do not seem to have been given the same consideration. • No landscape impact assessment has been completed for the Grovesend field development • In all meetings and feedback the vast majority of respondents have provided feedback regarding the importance of highways, access and infrastructure in choosing sites for development. This does not seem to be considered in the draft plan recommendations with particular regard to the lack of suitability of Old Church Road to support future development • The draft plan does not offer alternative housing development options and sites for the village residents to provide feedback on and ultimately vote upon. During the process there have always been options available including A. The Mill Lane site, location near to services and highways links has much greater suitability for potential development B. A higher assumption on infill development. Recent average new house infill developments have been significantly higher than the projected average included in the plan. These developments are spread across the village and with appropriate planning could ensure diverse development and less pressure on particular locations and roads of bigger housing developments. A number of these 1 or few house development applications have been rejected by the PC when they could have contributed to the Plans housing targets. Both sites are fields within the AONB, and

both are clearly visible from the Malvern Hills. However:

- Grovesend Field is within the Colwall Conservation Area and should be awarded greater protection;
- Grovesend Field is of historical importance to Colwall with the remains of Colwall's industrial heritage in the southern section and is bordered by listed buildings to the north;
- Grovesend Field has poor access, meaning increased traffic will impact on Stone Drive, Old Church Road, Oak Drive, and the awkward junctions with Mathon Road and Walwyn Road. Old Church Road is narrow and lacks a pavement, making future residents of any development less likely to walk to the village, and the ongoing safety of current pedestrian users is also a concern.
- The Mill Lane site provides a safer and more sustainable option, with excellent pedestrian access to key amenities including the school, village hall, scout hut, village shops and public transport on Walwyn Road / the station. Any vehicle traffic accesses Walwyn Road directly, via a well designed junction with excellent sight lines.

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 23 March 2020 22:04
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Miles
Last name	Huckle
Which plan are you commenting on?	Grovesend Field
Comment type	Objection
Your comments	I object to the draft NDP as I believe the process used to identify land for future development does not represent the direction the village has made clear when consulted on the local significance of the Grovesend Farm land within Colwall's landscape, its deserved inclusion within the Conservation Area, and the access issues through local roads. The land off Mill Lane, as originally proposed with broad village acceptance, would be preferable

Herefordshire Council – 26.03.20

Colwall Draft Neighbourhood Development Plan - Regulation 16 plan stage commentary

Dear Neighbourhood Planning Team,

Please find my comments regarding the request for feedback on the latest draft of the Colwall NDP

Whilst I am agreement with the concept of having an NDP and the need to meet the minimum housing growth targets – as we are in a protected AONB, I do not support the current recommendations of the latest draft plan.

In particular, I do not believe the process in the selection of sites for housing development reflects the strength of evidence and majority of consultation respondent feedback is not reflected in the draft plan.

I have followed and supported the preferred process of attending and listening to plan authors and contributors and provided appropriate evidence, feedback and challenge in a timely fashion and when requested through the various development stages since 2013.

However, I have been frustrated that my comments and those of the majority of respondents has not been considered and acted upon during these consultation process and stages.

So I would like to formally challenge the current NDP process and design finalisation recommendations in a number of areas:

- I do not believe the LSCA has been developed consistently and it should not be the only consideration in determining sites for Housing development. It has also changed over time without detailed explanation or in consultation with village residents. As a consequence Grovesend Field is included as a site for development in the latest plan even though it was excluded in earlier versions and the Mill Lane site area which was considered suitable for development in earlier plans has now has been excluded.
- A recent application for appropriate development on Mill Lane has been very strongly supported by a clear majority of village respondents – yet the Parish Council have rejected the application and excluded it as an option in the NDP. This happened even though a well constructed and appropriately designed proposal was formally submitted before the draft NDP was finalised and within 2days of the Draft NDP being formally shared at the Colwall Village Hall.
- Other key studies and documents such as Herefordshire Council's own SHLAA recommendations and the English Heritage confirmation of the Colwall Conservation Area which highlighted Grovesend Field as a protected open space and the 'green lung' of the village do not seem to have been given the same consideration.
- No landscape impact assessment has been completed for the Grovesend field development
- In all meetings and feedback the vast majority of respondents have provided feedback regarding the importance of highways, access and infrastructure in choosing sites for development. This does not seem to be considered in the draft plan recommendations with particular regard to the lack of suitability of Old Church Road to support future development

- The draft plan does not offer alternative housing development options and sites for the village residents to provide feedback on and ultimately vote upon. During the process there have always been options available including
 - A. The Mill Lane site, location near to services and highways links has much greater suitability for potential development
 - B. A higher assumption on infill development. Recent average new house infill developments have been significantly higher than the projected average included in the plan. These developments are spread across the village and with appropriate planning could ensure diverse development and less pressure on particular locations and roads of bigger housing developments. A number of these 1 or few house development applications have been rejected by the PC when they could have contributed to the Plans housing targets.

Both sites are fields within the AONB, and both are clearly visible from the Malvern Hills. However:

- Grovesend Field is within the Colwall Conservation Area and should be awarded greater protection;
- Grovesend Field is of historical importance to Colwall with the remains of Colwall's industrial heritage in the southern section and is bordered by listed buildings to the north;
- Grovesend Field has very poor access, meaning increased traffic will impact on Stone Drive, Old Church Road, Oak Drive, and the awkward junctions with Mathon Road and Walwyn Road. Old Church Road is narrow and lacks a pavement, making future residents of any development less likely to walk to the village, and the ongoing safety of current pedestrian users is also a concern. In addition, large (HGV) delivery vehicles already come down Old Church Road, turn into Stone Drive and then **reverse** down the very narrow part of Old Church Road because there is no 'turning' or 'passing' places for HGVs.
- The Mill Lane site provides a safer and more sustainable option, with excellent pedestrian access to key amenities including the school, village hall, scout hut, village shops and public transport on Walwyn Road / the station. Any vehicle traffic accesses Walwyn Road directly, via a well designed junction with excellent sight lines.

Finally, I hope the Parish Council will offer constructive opinions in the interests of the all the people in the village of Colwall.

Yours faithfully

M Lees-Briggs (mrs)

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 24 March 2020 20:48
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Michael
Last name	Raymond
Which plan are you commenting on?	Colwall Neighbourhood Development Plan
Comment type	Objection
Your comments	<p>I write to object at the inclusion of Grovesend Field in the Colwall NDP. Grovesend Field is within the Colwall Conservation Area, is of historical importance to Colwall and has poor access, narrow roads and awkward junctions serving the proposed site. In contrast, the proposed comparable sized, well supported and well considered Mill Lane development has been excluded from the village's NDP. In my opinion, this proposed site offers a safer and more sustainable option, with better pedestrian and road access and proximity to key village amenities including the new primary school and the village hall. I was also encouraged to see the percentage of proposed affordable dwellings contained within the Mill Lane development.</p>

Latham, James

From: Esrich, Paul <PEsrich@worcestershire.gov.uk>
Sent: 09 March 2020 08:56
To: Neighbourhood Planning Team
Subject: Colwall Regulation 16 Neighbourhood Plan - Comments

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.

The Malvern Hills AONB Unit has worked closely with Colwall Parish Council in developing the NDP and supports the Reg 16 draft. However, we do wish to see one or two corrections and amendments as follows. Apologies that these were not spotted at an earlier time. Hopefully they can be made at this late stage.

1. Para 4.24 – think word should be context not contest
2. Policy CD8, para 3 – needs tweaking to make sense
3. Policy CD8, para 14 – suggest changing the current text from:

Dark roofs, however, may increase heat absorption and would require additional ventilation for housing livestock. An exception to this is if a building has to be located against a skyline; it would then be more appropriate to use a lighter colour for roofing, which would blend more with the colour of the sky.

to:

~~Dark roofs, however, may increase heat absorption and would may require additional ventilation for housing livestock. An exception to this is if a building has to be located against a skyline; it would then be more appropriate to use a lighter colour for roofing, which would blend more with the colour of the sky.~~

Reason: It is not a given that a darker roof would lead to a requirement for additional ventilation since much may depend on other factors such as existing shading, positioning of building, elevation materials etc.

Reason: Many people believe it is inadvisable to use lighter colours against the skyline but in any case such locations are unlikely to be . Also, in the Colwall area it is highly likely that there will be views down onto any such buildings located on a skyline. Given that lighter roofs are likely to be detrimental in such views this sentence should be deleted.

4. Policy CD8, para 15 – suggest adding a new sentence to the current wording (in italics below) as follows:

Use of timber boarding is encouraged as it provides excellent natural ventilation for new agricultural buildings and it may be possible to source this locally. Applying a stain or paint finish to this boarding would often help to integrate a building more successfully into the landscape, especially if it is sited in a more prominent position.

Reason: To help ensure that new development is more successfully integrated into the AONB landscape.

I would be grateful if you would acknowledge receipt of these comments.

Thank you

Paul

Paul Esrich CMLI

Manager, Malvern Hills AONB Partnership

Malvern Hills Area of Outstanding Natural Beauty Partnership
Manor House
Grange Road
Malvern
Worcestershire
WR14 3EY

Tel: 01684 560616

email: pesrich@worcestershire.gov.uk

website: www.malvernhillsaonb.org.uk

The Malvern Hills AONB Partnership exists to support the conservation and enhancement of this nationally protected area.

The Malvern Hills AONB is one of a family of 46 Areas of Outstanding Natural Beauty in England, Wales and Northern Ireland.



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Latham, James

From: William Hawes
Sent: 27 March 2020 14:26
To: Neighbourhood Planning Team
Subject: Colwall Neighbourhood Development Plan

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 Sirs, I wish to object to the Colwall 2020 NDP, which seems to have taken decisions that don't reflect the views of the villagers, nor result in a plan that is best for the village.

Proposing Grovesend Farm for development means pushing more traffic through narrow Old Church Road, and along Stone Drive with many parked cars and an awkward junction. The site does not have separate pedestrian access, with no way to provide that identified.

The plan from 2015, which had good support, to have a new school and housing off Mill Lane was a good one, that site having many benefits, including not being part of the Colwall Conservation Area, which Grovesend Field is an important part of, and far better vehicle and pedestrian access, linking directly to existing footpaths towards the village.

The unexpected change of land allocation in 2018 was NOT broadly supported and comments in the subsequent consultation seem to have been ignored before this submission.

Yours faithfully, Mr. & Mrs. William Hawes

18 March 2020

Re Neighbourhood Development Plan

I have already expressed in a previous letter (written two years ago) my concerns re Building on Grosesend Field and the unsuitability of access via Old Church Road. Now, I understand there are plans to build on land by the new school on Mill Lane - this 'Lane' is the main access to the village's St James the Great Church and to Coddington Village & beyond - & like the previous mentioned Old Church Road does not have pavements/paths but grass verges - that are very muddy & soft if you are forced into them - by oncoming vehicles - whether on foot or in a car - do site planners ever physically walk these Lanes before thinking of granting permission to build?

Yours sincerely

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 27 March 2020 09:59
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Naomi
Last name	Beard
Which plan are you commenting on?	Colwall NDP
Comment type	Objection
Your comments	<p>I strongly object to the NDP in its current form. I believe it to be too heavily based on the opinions set out in one LSCA report to the exclusion of numerous other notable factors when considering the appropriate allocation of land for development. I do not believe that local people have been properly consulted, or that their views (when gathered some time ago) have been given appropriate consideration. I strongly believe that the inclusion of Land at Grovesend Farm for development is a fundamentally inappropriate decision, unsupported by valid evidence or a comprehensive assessment process. I believe other sites, particularly the site at Mill Lane where a planning application is already under consideration, offer much more sustainable and deliverable development options, to the benefit of the village as a whole.</p>

Our Ref: MV/15B901605

T: +44 (0)191 261 2361
F: +44 (0)191 269 0076

20 March 2020

avisonyoung.co.uk

Herefordshire Council
via email only

Dear Sir / Madam
**Colwall Neighbourhood Development Plan Regulation 16 Consultation
February – March 2020
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan 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 across England, Wales and Scotland.

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

National Grid 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.

Proposed development sites crossed by or in close proximity to National Grid assets

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

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

National Grid provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to National Grid infrastructure.

Distribution Networks

Information regarding the electricity distribution network is available at the website below:

www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting:

plantprotection@cadentgas.com

Further Advice

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

nationalgrid.uk@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 409247
Date: 27/03/2020

Dear Sir,

Colwall Neighbourhood Development Plan Consultation – NFU Response

The West Midlands NFU welcomes the opportunity to comment on the Colwall 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, who in addition to being custodians of the environment, play an important role supplying high quality local food and supporting rural economies.

The NFU recognises that neighbourhood plans can help shape, direct and deliver sustainable development and deliver a communities vision for a parish (paragraph 29 of the National Planning Policy Framework 2019), but also have to demonstrate how the plan will contribute to improvements in environmental, economic and social conditions or that consideration has been given to how any potential adverse effects arising from the proposals may be prevented, reduced or offset (referred to as mitigation measures) (paragraph: 072 Reference ID: 41-072-20190509 of Planning Practice Guidance).

The NFU would emphasise the importance of all neighbouring plans, to consider the potential impact they could have on rural economies, climate change, food security, providing affordable homes and getting essential rural infrastructure in place. We also have real challenges for our elderly rural population to ensure they get the services they need, including broadband, appropriate housing and dealing with isolation. At a time when we have an Agriculture Bill and Environment Bill coming forward, as well as changing trading conditions it is essential that

neighbourhood plans can support their farming and rural communities to move to a more sustainable future.

These issues could be more challenging for a village and wider parish with farmland and landscapes within an AONB and hence need clear support in the neighbourhood plan. This would ensure the plan can meet the objectives of National Planning Policy Framework as a whole, as well as those emphasised in paragraph 172 of the National Planning Policy Framework. The importance of farming and living in landscapes, emphasised in the recent Landscapes Review, means there must be some thought about the additional burden of costs which could be created and how these can be mitigated.

You may be aware that the farming industry is committed to be carbon neutral by 2040, which will mean land use change, more renewables and more efficient buildings, including glasshouse and polytunnels. The Government targets for 2050 and legislation now coming into force will affect how we live our lives, heat our homes and drive vehicles. We would ask you to ensure that the neighbourhood plan promotes carbon neutrality and climate change provision. A simple way to cut a carbon footprint is access to local, sustainable food; but the neighbourhood plans can also help, by encouraging sustainable and inclusive housing design at a cost rural workers can afford, and that residents have access to vehicle charging stations and renewable energy supplies.

Herefordshire's economy is underpinned by farming, with many landscapes maintained by family businesses. The Agriculture Bill will require them to be producing more food on less land, with new buildings and operations. Only if this happens can they then increase ecological and biological diversity of other land and landscapes and allow this to adapt to climate change. Only by allowing farming to become more productive can there be the ability to allow the landscape to produce more public goods for the benefit of the wider community and visitors. The neighbourhood plan has therefore to recognise and ensure it can happen with the minimum regulatory burden and support.

Food security is becoming more important, and access to sustainable, local food impacts on every carbon footprint. Currently only circa 8% of the fruit we eat and 53% of the vegetables are produced in the UK. Climate change, particularly access to water supplies, is affecting key countries who import to the UK, whilst areas such as Herefordshire and Worcestershire continue to have more plentiful water and high quality soils and are much needed to produce more food for us. The need to ensure local produce is available to all has never been higher.

The NFU would emphasise the importance of ensuring you contact any farmer or landowner in Colwall parish and those with adjoining land to ensure that the plan has considered how their farm businesses and future has been assessed and accommodated by the document. This is essential as some of the draft policies appear to directly conflict with the planning system; as well as the wider regulatory framework and changing legislation for farm building and operations and how land is managed. The document may understandably have a landscape focus, but it is for a farmed environment, with new ecological and environmental challenges, which it must be in tune with.

We would highlight the need for policies CD2; CD5; CD6; CD8 and CD9 and CRE to be amended before any examination and provide detailed commentary for these essential changes.

Paragraph 29 of the National Planning Policy Framework is clear that neighbourhood plans should not promote less development than set out in the strategic policies for an area, and we are concerned that this could happen by reason of the overly prescriptive nature of the policies. We would also point out the use of land for agriculture or forestry does not fall within the remit of development for which permission is needed under the town planning system nor should any neighbourhood plan seek to restrict agricultural building development that is, as a matter of principle appropriate development in an AONB.

The plan should reflect the recent Planning Inspectorate Appeal Decision Appeal - Ref: APP/W1850/W/19/3239434, Land at Chances Pitch, Colwell, Ledbury, Herefordshire WR13 6HW. This decision was issued on 19 February 2020 and relates to prior approval for a general purpose agricultural building for the storage of grain/fertiliser in Colwall. The content of the decision covers a range of relevant issues including; landscape policy, the siting of agricultural

buildings and screening and should inform the neighbourhood plan policy on these issues. We recommend that the neighbourhood plan is amended in accordance with this decision in order to ensure that no further appeals are need on this topic.

We have the following specific comments on the plan:

We must firstly state how concerned we are by the scope and detail of the guidance within this plan, which for farming and landscape, which appears to so onerous as to appear to seek to restrict agricultural development, which would otherwise be appropriate in an AONB.

Any policy should be workable and support farming, within the context of environmental and landscape benefit, including climate change adaptation, otherwise it will not support a future living and working AONB and should not be in the plan. We recommend you seek support from a consultant with agricultural expertise to help.

It appears that some of the policies are in fact aspirations and guidance that duplicate existing resources in which case ensuring the farmer and landowner gets access to guidance and advice would be far more appropriate than seeking to impose them through a neighbourhood plan.

Without amendment more generally the document could inadvertently amount to an additional regulatory burden upon business and the rural community, rather than bringing forward appropriate development and protecting cherished landscapes.

Design and Colour

There are several references to colour and colour pallets throughout the document. We made representations to the Malvern Hills AONB in 2016 on this topic and we remain concerned by this approach. We think the document, by seeking to impose a colour palette may be well intentioned but is too prescriptive and has the potential to be confusing and impose an unnecessary and possibly discriminatory burden by virtue of the added cost.

It is important for new design codes to demonstrate how they reinforce a sense of place and can work in practice, if they are to be promoted more fully by the planning system. The local

planning authority will not be able to enforce the use of a specific colour that is not available or suitable for a building.

Colour is an extremely subjective issue, and planning permission is not required to change the colour of a building in most instances, so this document could be used to constrain repair and upkeep of buildings, which may be needed to comply with other legislation. We believe it could be useful to assess additional cost burden that will be created and how the parish council could help this to be funded.

There is also scope for a developer to inadvertently select a colour from the “wrong” palette, or there may be issues in securing building materials in the colours specified. All of this has the potential to add significantly to the costs of development and could lead to difficulties when developing a planning application. For example, we can foresee subjective and complex arguments about colour and its place in the landscape were a development to go to appeal.

Promoting High Quality Design

Policy CD2 General Design principles for development within Colwall settlement boundary.

Building design – point 26:

This policy should be amended as it cannot be applied successfully to bring forward farm buildings. For example, it is very difficult to break up the rooflines of modern farm buildings into smaller elements as they are designed to meet regulatory requirements, such as animal welfare and food storage requirements.

Many traditional farm buildings became redundant because their design did not give sufficient ventilation which led to health and welfare problems within livestock. There are similar concern for other agricultural buildings such as grain and potato stores which would be built to accommodate specific air flows which could not be accommodated in a smaller building.

Policy CD5 general design principles for development in the wider countryside

A. High Hills and Slopes

The reference to new agricultural development not being appropriate in this landscape should be deleted as it is one of the few forms of development in principle to meet this test. Any policy

should be workable and support farming, within the context of environmental and landscape benefit, including climate change adaptation. We would recommend this policy be rewritten. Local farm businesses should be supported as producers of sustainable local food and key delivery mechanism for landscape and biodiversity assets.

B Principle Wooded Hills

12: As stated above, these sites need to evolve and develop. New tracks may be necessary to aid woodland management. It is important that existing and new woodlands are managed appropriately for them to maximize carbon sequestration opportunities as well as to continue to form a landscape worthy of an AONB.

C Wooded Hills and Farmland

20: This appears to supplement guidance rather than being appropriate as a neighbourhood plan policy. Using more than one building material may not be achievable in all agricultural building projects, so this policy needs to reflect this and thought given to how these additional costs will be met. Local farm businesses should be supported as producers of sustainable local food and key delivery mechanism for landscape and biodiversity assets.

D Principle Timbered Farmlands

25: It is not clear what “new agricultural buildings should enhance the diverse built character” means in practice these will be in rural settings and not designed for public view or use. Their design must respect their function to provide safe food and animal welfare, increasingly they will accommodate climate change adaptation. We recommend this text is amended.

26: Please bear in mind that species planting recommendations will change as the climate changes and that forestry professions are already suggesting that we should be looking at a wider range of species more suited to a changing, warming, climate. We recommend the plan anticipates and accommodates this.

Farmsteads and Agricultural Buildings

Policy CD6 Farmsteads

We have to repeat that any policy should be workable and support farming, within the context of environmental and landscape benefit, including climate change adaptation. If such a policy is

not simply duplicating existing guidance we would recommend this policy be rewritten after the appropriate discussions with the landowners have taken place, and after a full evaluation of the additional costs and opportunities for the land has been made. Local farm businesses should be supported as producers of sustainable local food and key delivery mechanism for landscape and biodiversity assets.

1: Farmsteads are surrounded on all sides by open fields and woodland. Therefore it may not be practical to avoid blocking all views. This policy has the potential to stifle rural development and the rural economy especially as some infrastructure improvements will be regulatory requirements to protect the environment and is necessary for food production.

Any farmstead work needs to be carried out at an appropriate level, traditionally at County level with landowners and tenants involved to ensure they make sense for their farm businesses. We are concerned as to why this has been put forward unless it specifically relates to land in the control of the parish.

Concepts such as “significance of farmsteads” are very abstract and difficult to define and add significantly to costs and uncertainty for businesses applying for planning consent, this work has to be done at an objective scale.

2: As stated above, this requirement is not appropriate and raises concern about priority of the neighbourhood plan.

3: It is unrealistic to suggest that modern agricultural infrastructure and buildings could or should be constricted using traditional building materials and / or salvage materials. This level of control is simply not reasonable or reflective of good practice in national parks and AONB.

4: It is not clear how this would be helpful and think there will be existing guidance available. If landscaping is appropriate, its design should address the function of the building and AONB setting as well as biodiversity and any climate change function.

5: As a general principle, buildings should be well designed according to the specific conditions of each site, in so far as technical requirements permit. Farmers are increasingly required to look at site layout, building design and materials to minimise fuel costs and reduce carbon emissions at source. Renewable energy generation on or within these buildings will become more important particularly as we seek to achieve net zero carbon emissions. It is important that we support farming businesses in these objectives and over prescriptive guidance avoided.

6: We are supportive of this section as farmers are uniquely positioned to generate renewable energy.

7: Is this a duplication of earlier guidance? This should be determined on a case by case basis.

10: The requirement for rooflights will vary according the design and function of each building. Therefore this section is unduly prescriptive and could undermine climate change adaptation.

New Agricultural Buildings

Policy CD8

New agricultural buildings are appropriate in Areas of Outstanding National Beauty as a matter of national and local plan policy, so this policy has to accord with this and anticipate new development which has to happen as part of the Agriculture Bill.

2: Land is sold without buildings and new buildings will be required in new locations in order to run a farming business. This is particularly important for new entrants to the industry, many of whom will be working to ensure landscapes are maintained as part of new Environmental Land Management Schemes.

Farmsteads have evolved over time, and therefore whether they dominate existing buildings is a subjective judgement. Historic farm buildings were there to facilitate food production and modern buildings are simply the latest in a long line of rural buildings which the planning system is designed to accommodate to continue to produce safe, affordable, high quality food.

3: It is very difficult to determine what this section actually means in practice. We suggest that it be rewritten to form a more proactive and supportive policy or be deleted as there is existing guidance available.

4: Often farmers need to replace traditional farm buildings because they are no longer suitable for modern livestock rearing and crop production. For example, they may no longer meet animal welfare or food hygiene standards. The scale of the building is often important to give livestock sufficient space and ventilation and to accommodate modern agricultural machinery and other infrastructure. Operations need to be of sufficient scale to make them economically viable.

5: Guidance recommending the construction of two smaller buildings will not help farmers. It will add to costs and to the footprint of development. The buildings may not be suitable for the reasons outlines above in point 4.

6: This policy seeks to reintroduce building features that have been designed out of modern farm buildings. Features such as low eaves, roofs and ceilings often make traditional buildings unsuited to modern livestock production as they have poor ventilation. It is not desirable to design redundancy into new infrastructure and definitely not at a parish council level. There is already guidance for designing farm buildings and this avoids such issues in the main.

7: Does this conflict with earlier guidance on location which focuses on the proximity to existing farmsteads?

8: Landscape architects will be assessing planning applications in the AONB and this can avoid unpractical and unduly costly guidance. From a climate change point of view young trees would be preferable as they will sequester more carbon as they grow than a mature tree grown off site.

10,11, 12 & 13: These points, if appropriate will be more suited to be dealt with by existing guidance rather than plan policy.

14: In practice any planning application will deal with animal welfare issues and hence any design guidance should be assessed alongside it as supplementary guidance.

Polytunnels

As new agricultural buildings are appropriate in Areas of Outstanding National Beauty as a matter of national and local plan policy, the Neighbourhood plan should set out positive policies to accommodate these or defer to the supplementary planning guidance already in place. The guidance below may be of value for how to take this forward.

6.5.9: In order to be a balanced document Section 6.5.9 must give some background information on the reasons for using polytunnels, particularly in Herefordshire where they are so important to the rural economy.

Soft fruit production within Herefordshire is recognised as a major industry, rural employer and producer of food. It is clear that the economic benefit of soft fruit production spreads much wider than to the farm alone. Primary soft fruit production will support a whole supply chain and therefore many jobs.

The soft fruit farms of Herefordshire would not be viable without the use of polytunnels as in many instances it is quite simply uneconomic to grow soft fruit in the open in the UK climate.

Many of the farms involved cover small acreages and would find it difficult to survive without soft fruit production. Herefordshire growers have invested enormous capital and resources in the polytunnels, equipment and associated infrastructure including pack houses etc. Their contribution to the local rural economy must be given full consideration when determining a planning application.

Policy CD9: Polytunnels

The policies within this section must be in alignment with Herefordshire Councils Polytunnel Planning Guide 2018 and should not be more restrictive.

Renewable Energy

We are very supportive of Colwalls aspiration to contribute to a low carbon future. Agriculture is uniquely placed to be part of the solution, as both an emissions source and a sink. As farmers we have a special responsibility to protect carbon reserves already in our soils and vegetation. But we must and we can do more. There is no single answer to this problem. To achieve our aim we will need a range of measures that fall under three broad headings:

- Improving farming's productive efficiency;
- Improving land management and changing land use to capture more carbon;
- Boosting renewable energy and the wider bioeconomy.

The NFU believes that the agricultural sector is very much part of the solution to decarbonising the UK economy and achieving net zero and we are working on proposals for pilot schemes to introduce policy incentives to bring to life net zero for farmers and growers. But we will only be able to achieve our carbon neutral goal with concerted support from government, industry and other key groups to help deliver this challenging, but achievable, ambition.

Policy CRE1 Renewable Energy Schemes

Boosting renewable energy and the bioeconomy to displace greenhouse gas emissions from fossil fuels and to create GHG removal through photosynthesis and carbon capture is a key part of the NFU ambition for achieving net zero. Therefore we welcome the support for small scale renewable energy in policy CRE1. As our work on net zero evolves more information on the part local farms can play will become available.

Thank you 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

Latham, James

From: Oliwia Kowalska
Sent: 27 March 2020 20:46
To: Neighbourhood Planning Team
Subject: Colwall 2020 NDP

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.

I write this letter to object from the Colwall 2020 NDP, which doesn't seem to be in the best interest for the village.

Grovesend Farm is not a good choice for future development. First of all it is a part of the Colwall Conservation Area and second of all it will bring more traffic through the Old Church Road as well as Stone Drive with many parked cars alongside of them. They also don't have a good pedestrian walkways so it wouldn't be safe for people that already live there. Myself I have a small child and know other neighbours also with children are worried how badly it may impact the safety of our families.

I do believe that the previous plan from 2015 to build off Mill Lane was by far much better than Grovesend Farm.

Best regards,

Oliwia Kowalska

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Latham, James

From: Peter Bridges
Sent: 24 March 2020 10:07
To: Neighbourhood Planning Team
Subject: Letter concerning the current draft of the Colwall neighbourhood Development Plan - AN OBJECTION. Attn: Ms S Banks

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 Ms Banks

I am writing to register my objections to the current draft of the Colwall Neighbourhood Development Plan.

I cannot understand why the proposed development site at Mill Lane is not included in the NDP whilst the more important and more sensitive Grovesend Field has been included.

Both sites are fields within the AONB, and both are clearly visible from the Malvern Hills.

However:

- Grovesend Field is within the Colwall Conservation Area and should be awarded greater protection;
- Grovesend Field is of historical importance to Colwall with the remains of Colwall's industrial heritage in the southern section and is bordered by listed buildings to the north;
- Grovesend Field has very poor access, meaning increased traffic will impact on Stone Drive, Old Church Road, Oak Drive, and the awkward junctions with Mathon Road and Walwyn Road. Old Church Road is narrow and lacks a pavement, making future residents of any development less likely to walk to the village, and the ongoing safety of current pedestrian users is also a concern.
- The Mill Lane site provides a safer and more sustainable option, with excellent pedestrian access to key amenities including the school, village hall, scout hut, village shops and public transport on Walwyn Road / the station. Any vehicle traffic accesses Walwyn Road directly, via a well-designed junction with excellent sight lines.
- The development of affordable housing on Mill Lane will allow young families to settle in Colwall, satisfy local requirements for such a provision and allow children to walk to and from school rather than being driven. The impact of a Grovesend development on village traffic will be considerable and should be avoided.

Your sincerely

Peter Bridges

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Ms Samantha Banks
Neighbourhood Planning Manager
Neighbourhood Planning Team
Environment and Place Directorate
Herefordshire Council
Plough Lane
Hereford
HR4 0LE

31 March 2020

Tel: 01432 261576

Email: sbanks@herefordshire.gov.uk

www.herefordshire.gov.uk/neighbourhoodplanning

bj@herefordshire.gov.uk

Dear Ms Banks,

We are writing this joint letter to you having just received a copy of an email from Roland Close (former Principal Planning Officer of Hereford County Council) of 16 June 2017 which was obtained under the Freedom of Information Act. The name of the recipient has been redacted but a list of other recipients and text in the body of the email indicate that it was sent to John Stock, Chairman of the Colwall Parish Planning Committee and author/compiler of the Colwall Parish Neighbourhood Development Plan (NDP). Close's email (copy attached) is important as it states what will be required should development of housing on Grovesend field be included in the Colwall NDP, viz:

- a. Providing a 2m footway along Old Church Road / C1165 from any proposed means of vehicle access to Stone Drive (U66612) - *it appears that this would need obtaining land from 'Pembroke Lodge'; and / or*
- b. Providing a footway link to Stone Close (U66613) in that gap between numbers 5 & 6; and / or
- c. Surfacing in an appropriate material public footpath CW30 from the site to the Thai Rama site' together with provision of pedestrian footbridge over the brook and the re-surfacing in an appropriate material of public footpaths CW30A and CW30B connecting to 'The Crescent'.

It is clear from this document that the development of Grovesend Field is totally dependent on the provision of pedestrian access to the Grovesend site as laid out in points a) to c) above yet none of the details of such access were published.

This letter concerns only point b). My wife and I are the owners of REDACTED; Messrs Colin and Jeffrey Neville are the owners of REDACTED and this letter expresses our joint views on point b) which we reject as it will have an unacceptable impact on residential amenity.

We wish to make the following points:

- 1) The email from Close is dated 16 June 2017. Since then we have received no indication from the planning committees of either Colwall Parish Council or Hereford County Council that a substantial parcel of private property held by numbers 5 & 6 Stone Close may be required for the provision of pedestrian access to Grovesend Field. There is scant reference to these point in the current draft of the Colwall NDP.

- 2) We hereby state categorically that such a requirement does not have the consent of either the Bridges or the Neville families.
- 3) Furthermore, the basic premise of point b) in Close's email is wrong. There is no gap between numbers 5 & 6 Stone Close. Figure 1 below (an extract from H.M. Land Registry – Title No. HE1504) shows that numbers 5 & 6 share a common boundary – 6 Stone Close is outlined in red. There is a space between the two houses but most of this is taken up by a drive which is the only access to 6 Stone Close.

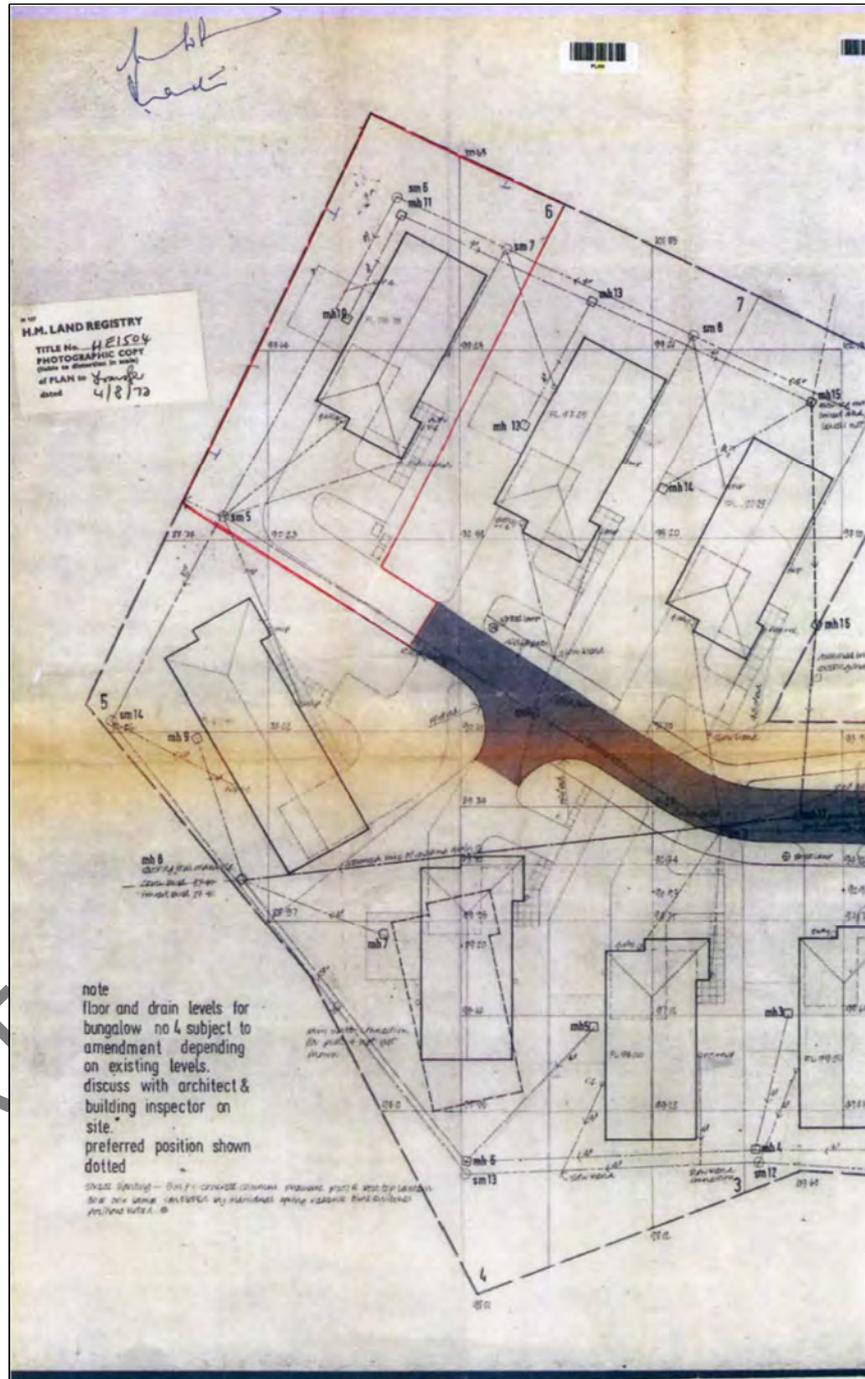


Figure 1 Extract from H.M. Land Registry – Title No. HE1504

- 4) The edge of the drive lies less than a metre north of the common boundary to the two properties. The drive is narrow (3 metres on average) and any encroachment on the drive will impede vehicular access to 6 Stone Close – see Figure 2 below. This is unacceptable.



Figure 2. Photograph looking west along the drive to 6 Stone Close

- 5) Because of 5) above any pedestrian pathway will have to be within the land belonging to 5 Stone Close. It will also require two-metre high fences on either side of the path to maintain privacy for each property. A 2m-wide pedestrian walkway will have an overall footprint of up to 3 metres, once appropriate fencing is put in place. This will be an eyesore and will have an unacceptable impact on the residential amenity of Stone Close and the financial value of the two properties.



Figure 3. Photograph looking south from 6 Stone Close to 5 Stone Close

- 6) The space between the property boundary to No. 6 Stone Close and the nearest point of the house at 5 Stone Close is just over 4 metres meaning that the fence

securing the privacy of no. 5 Stone Close will be just over 1 metre away from the house. This is also unacceptable and raises a series of other problems with visual intrusion, loss of light, privacy, noise, etc.

On a separate matter, we are also deeply concerned that after all this time and despite several requests which produced no response, we have only received this information the day after consultation on the Colwall NDP closed. If I had known last week what I do today I would have included the above in my recent email to you.

Consequently, even though this letter has been written after the final date for responses to the Colwall NDP we expect you to include it in the responses. Please let us know if this is not the case.

We look forward to hearing from you

Your sincerely,

Hard copy signed and posted

Peter and Valda Bridges

Messrs Colin and Jeffrey Neville

LATE REPRESENTATION

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 16 March 2020 10:31
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Peter
Last name	Hayward
Which plan are you commenting on?	Coilwall
Comment type	Objection
Your comments	<p>The draft Colwall Neighbourhood Development Plan ('NDP') covers a number of issues but acknowledges that the most important one is redefining the settlement boundary to allow for more housing, and it is this issue on which I wish to comment. It proposes two additions to the settlement boundary, a small one at the old school site (plot 3 in the Landscape Sensitivity and Capacity Assessment or 'LSCA') and a larger one at Grovesend (plot 12). It acknowledges that the main driver for the choice of these two sites was the LSCA. I have no issue with the choice of plot 3, but the choice of plot 12 is, I submit, fundamentally misconceived.</p> <p>Grovesend: Conservation Area The Grovesend site is part of the Conservation Area. Development in a Conservation Area should preserve and enhance the character of the area. The draft NDP acknowledges this but then fails to assess how the proposed development preserves, let alone enhances, the area. The proposed development does not and cannot preserve the character of the conservation area, especially when you bear in mind that the open field here is itself part of that character. By glossing over this point, the draft plan has failed to properly assess the suitability of the site. Worse, it actually admits that the development will damage the Conservation Area when it says the detailed development proposal must</p>

"reduce" (not, you will note, "prevent") the adverse effects on the character of the Area. Grovesend: Accessibility Recognising the poor accessibility of the Grovesend site, the draft NDP also says that the development should be conditional on the provision of safe, surfaced pedestrian and cycle links to the amenities and facilities in the centre of the village, but fails to consider how that could be achieved. The site's only access to the public highway network is on to Old Church Road. This road is too narrow to permit the addition of a footpath (let alone a cycle path), as even now over significant stretches vehicles can only pass by pulling into the private driveways of the houses along the road. From Old Church Road, access to the main village facilities would be via Stone Drive. The footpath here is already inadequate at the northern end, where hedge encroachment has left it too narrow to use, whilst over its southern half its winding route, coupled with parked cars lining the street and extra traffic to/from the surgery, make it a difficult road for motorists and a dangerous one for cyclists. By glossing over the accessibility problems of the Grovesend site rather than considering whether there is any feasible solution (and I don't think there is), the draft plan has again failed to properly assess the suitability of the site. Grovesend: Visual Sensitivity Given the sensitivity of the whole area, the draft plan rightly considers the effect of any development on "exceptional key views". That is a challenge for Colwall because without doubt the most important views are those on to the village from the ridge of the Malvern Hills, and as the whole village is clearly visible from the much of the central section of that ridge, any development will have a detrimental effect on the views from the ridge. The most we can hope for is to minimise that detrimental effect. The Grovesend site is clearly visible from the central ridge, Herefordshire Beacon and Worcestershire Beacon, so it has no particular advantage so far as views into the village are concerned. It also has no particular advantage so far as views when approaching the village from the west and views out from the village are concerned – all sites on the west side of the village have a

detrimental effect on such views. An alternative I recognise we have to find some addition to the settlement boundary in order to meet housing needs, so is there a more suitable site? I believe there is, the Mill Lane site that is currently the subject of planning application P200156/O. This was not seriously considered by the Parish Council because the LSCA assessed its 'landscape sensitivity' as higher than that of the Grovesend site. However, when you look at the two sites and compare the assessments of the individual elements that contribute to the overall landscape sensitivity score, they seem to be completely arbitrary as it is difficult to see why the scores for the two sites should differ significantly. The Mill Lane site should have been given a fuller assessment.

Comparison: Landscape Setting I note that the two sites have both been scored high-to-moderate for 'visual sensitivity' and 'landscape value'. I would have agreed with equal scoring before the new school has been built. Arguably the Mill Lane site is slightly better screened from Herefordshire Beacon than the Grovesend site, but there's not much to choose between them. However, the school changes the balance. Whilst much needed, a school is essentially an industrial-style building, and there's nothing worse than confronting such a building as the first thing you see on approaching a village, nor seeing such a building on the edge of a settlement when you look down on it from above (in this case, from the ridge of the Malvern Hills). Wrapping housing around such a building can actually reduce its visual impact as it is then seen as embodied in the settlement, not as a carbuncle on its edge. (I mean no disrespect to the designer of the school as I think it's been well done, but it still jars, especially when you look down on the village.)

Comparison: Accessibility I also note that the Mill lane site has far better vehicular, cyclist and pedestrian access than the Grovesend site.

Conclusion In my view, therefore, the NDP should extend the settlement boundary to embrace the Mill Lane site but not the Grovesend site because development of the former will not damage the Conservation Area and will do less harm to the landscape visually, and this site has much better accessibility.

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 26 March 2020 18:28
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Phiona
Last name	Hewitt
Which plan are you commenting on?	Colwall NDP
Comment type	Objection
Your comments	I object to the latest version of the Colwall NDP. The plan to have both school and housing off Mill Lane had excellent support from the village. The change to then say that Land off Mill Lane could not be used for housing does not seem to be a village decision. Grovesend Farm, accessed off Old Church Road, means pushing even more traffic down narrow roads. Mill Lane has none of these issues. Thankyou

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 26 March 2020 11:56
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Phyllis
Last name	King
Which plan are you commenting on?	Colwall
Comment type	Objection
Your comments	<p>I cannot support the NDP because the proposed site for 37 additional houses is Grovesend Field, which is in the Colwall Conservation area. The site on Mill Lane adjacent to the Colwall C of E School, would be far more suitable and was overwhelmingly voted for by villagers in the 2014 consultation. My main concerns are • Grovesend is in the Colwall Conservation Area and has historical importance for the village as well as listed buildings. It should be given greater protection. • Grovesend is unsuitable because it has a very poor road and pedestrian access. Old Church Road is narrow and winding and there would be serious safety concerns. • The Mill Lane site is a much safer option with easy access from Walwyn Road. It would also provide easy access to the school and Village Hall, the Scout Hut and public transport. It has safe pedestrian walkways. Therefore I do not support the NDP in its present form.</p>

COLWALL NDP REG16 REPRESENTATION

I strongly object to the current Colwall NDP now under regulation 16 consultation with Herefordshire Council.

My objections are mainly in three areas:

1. Available evidence demonstrates the NDP is not in line with the community responses. I understand that a major reason for the legislation is to give communities the opportunity to decide where development is best in their area. The NDP fails in this.
2. Although the LSCA has been used as the major evidence base for the NDP other very important matters have not been fully considered, and appropriate weight given to them. Also the LSCA is not without flaws as a major evidence base for selection of sites for development in the village. I understand that a prime purpose of a NDP is to deliver the best sites that can be developed. The NDP fails in this.
3. The selection of Grovesend Farm as a site for development rather than Mill Lane has been heavily contested by villagers but to no avail. The Parish Council has not and will not consider changing their NDP, basing their decision purely on the LSCA (for some reason Mill Lane has been revised down to the lowest level from a higher level in the initial LSCA) and an apparent ruling by Herefordshire Council that no development should be allowed beyond the boundary of the new school in Mill Lane.

Village support for the NDP ignored by the Parish Council

When the draft NDP was presented to the village in 2015 responses were sought on the sites then allocated. The Mill Lane site (Area 9) was heavily supported by the village for housing (65 for, 7 object) and for school and housing (82 for, 8 object). Please note that the site currently proposed in the NDP, Grovesend Farm (area 12), was proposed as a school site only in 2015 and this had 6 support and 56 against. Although the Parish Council did not ask the village views on housing for Grovesend Farm site in 2015 there is every reason to suppose the response against this site would have resulted in a similar level of objections. The many responses in the 2018 consultation document (389 pages) have been ignored or summarily dismissed. For example the Parish Council Reg 14 response, to Representation 120 on page 302/389 of which states that:

'the village feedback is just that; it has not been endorsed by CPC'

and on page 308/389 which states that

'these statements were a selection of comments made by the public they were not made by or endorsed by the Parish Council'

The 2018 NDP made a U turn on site selection and I consider this should be reversed so that the village's original support for Mill Lane site is respected. .

LSCA status

As stated by the Parish Council this is the “major evidence base” for their NDP. Although this has bearing within the AONB and needs to be considered it should not be the only or main tool to identify sites for development. Due weight must be given to other factors but this is plainly not the case. Using the LSCA to identify sites for development in the 2015 draft NDP resulted in many sites being proposed that were unsuitable for development and abandoned in the 2018 NDP. Of the 10 sites identified in 2015 NDP by the LSCA only 1 survived (see slide 17 of the 2018 presentation made by the Parish Council to the Village). This highlights that the LSCA “capacity to absorb development” is not fit for purpose in preparing an NDP or at least less than great weight should be given to it.

At page 307/389 of the Reg 14 response to representations the Parish Council states that:

-‘The LSCA is the starting point; each plot is considered in accordance with their rating and if other matters are acceptable, included for development until the target is achieved.

Other areas may be preferable for other reasons but unless we demonstrate ‘great weight’ has been given to the landscape the plan will be rejected. The accepted method of demonstrating this is by a LSCA’

Would Herefordshire reject the plan if great weight was not given to the LSCA, which itself has been amended a number of times through the process? Does Herefordshire consider the LSCA to be the “accepted method” for NDPs. Herefordshire Council has certainly taken a different view when considering actual planning applications such as the new developments of 9 houses by the Thai Restaurant in Walwyn Road and the 10 houses built directly opposite the Thai Restaurant. Both of these sites were considered to be of the lowest level for any development in the original LSCA prepared. In addition the LSCA is completely out of step with the Herefordshire SHLAA of 2012 and 2015 which indicated Mill Lane to be a site suitable for development and Grovesend to be unsuitable. Surely this highlights that weight has to be given to many factors other than the LSCA.

Site selection – Grovesend Farm v Mill Lane

Both areas are within the AONB but only Grovesend Farm is in the conservation area. There are very good reasons for this land to be in the conservation area which were examined during its classification and these have not changed. Please note that on 24th October 2019 the Parish Council strongly objected to an application for one new dwelling at Checketts, Old Church Road (number 193186) as contravening LD1 of Herefordshire Core Strategy and this is attached as part of my comments.

How can the Parish Council then take the opposite view on a possible site for 37 houses in arguably a far more sensitive sight in Old Church Road in close proximity to three listed dwellings,.

Due weight has not therefore been given in the NDP to Grovesend Farm being in the only conservation area.in Colwall. Mill Lane is not in a conservation area.

The road network access to Grovesend Farm (vehicles and pedestrians) is unsuitable whereas this is not a problem in Mill Lane (see SHLAA comments below).

In the 2012 and 2015 SHLAA, Grovesend Farm was classified as having no potential during the plan period and was excluded as a suitable site due to access. Appendix 11 notes:

"The local road network would not sustain intensification of use"

Land adjacent to Colwall Village Hall (Appendix 10, page 18 of 29) ref 0/Col/007, and 'summary_schedules_for_rscs_and_hubs.pdf' (page 4 of 31) – Conclusion:

'Yes, some form of development would appear feasible here. Accessible and outside the flood plain. Far too large if considered in totality

Furthermore, when Grovesend Farm was considered for a potential school development in the 2015 Draft NDP it was stated that the site had:

'Highways & access limitations given existing infrastructure'

When this matter was raised through the Reg 14 consultation stage of the NDP, the repeated Parish Council response (e.g. p221 of 389) to representations from villagers was:

"The Highway Authority has confirmed (R Close email 16 June 2017 attached) it is content for the Grovesend development of 37 homes to go ahead "... subject to the provision of a safe and suitably surfaced (suitable for all seasons of the year) pedestrian link or links to the amenities and facilities of Colwall Village". The issue of pedestrian access will therefore have to be dealt with as part of the development of the site."

Despite requesting confirmation of this Highways approval from the Parish Council nothing has been provided. I consider this to be a major issue for any development at Grovesend Farm but again when challenged the Parish Council stated that this is an issue for the developers not the NDP.

. As the whole purpose of the NDP is to identify sites for development that are deliverable no NDP should be approved unless it is evidenced that the sites identified are available and deliverable. The current planning application on Mill Lane for 37 houses demonstrates that this site is available and deliverable. However this application is being recommended for refusal (see 200156, correspondence from R Brace to agent) due to landscape. The landscape officer in his report on this application states:

"The site is outside of the settlement boundary (Map 5 Policies Map) and is contrary to the ambitions of the local community as set out in the Colwall Draft Neighbourhood Development Plan 2011-2031 (dated Jan 2018)"

I believe you will see from consultations you have and will receive that in its present form the NDP cannot and should not be taken as the ambitions of the local community.

One of the reasons given by the Parish Council for removing Mill Lane from the NDP was:

The Parish Council's Reg 14 response to this U-turn, and to queries on why 'Land adjacent to the Village Hall, Mill Lane' had been removed as a housing site from the Reg 14 NDP, was made 17 times in the Parish Council response to representations table (e.g. p246 of 389) as follows:

'that HC initially proposed a mix development of a school and housing and this was the scheme taken to public consultation. Subsequently after Mill Lane has been selected for the school. HC decided to only build the school so no houses were built. The new school changed the landscape character of the surrounding land and as a result the LSCA had to be amended. In the reassessment LSCA the capacity of the land to the west of the school changed to the lowest level hence no development is proposed in the Plan.'

Is it the case that Herefordshire decided no houses were to be built? I understood that any settlement boundary issues were now the prerogative of the NDP not Herefordshire Council.

Conclusion

From a villagers' perspective, a view I know shared by many in the village, choosing to build in Mill Lane rather than Grovesend Farm is far more sensible and far less disruptive and damaging to current village residents. Any development in Mill Lane will directly affect less than 20 houses whereas development of Grovesend Farm would directly affect all residents in the upper stretch of Old Church Road and all of Stone Drive (81 houses). Oak Drive and its many cul de sacs (47 houses) would also suffer disruption as would the junction with Brockhill Road (30 houses plus Downs School) and the Crescent/Crescent Road (71 houses).

The area around Stone Drive has already suffered major development over the years and the view from the hills already has a large block of housing centred around the Colwall Stone area rather than recognizing the historic linear development of the village. A Mill Lane development rather than Grovesend Farm would help to maintain the linear aspect. Please see below a satellite map of this part of Colwall highlighting access to each site and the linear nature of the village..

The NDP should be referred back to the Parish Council and the village given the chance to decide between these two sites. A referendum offering Mill Lane or no NDP in place is not a choice the village should have to be asked to make. ..If the current NDP is not amended there will be strong opposition to it at the referendum stage as no NDP is preferable to a bad NDP.

RF Beard

25th March 2020



-----Original Message-----

From: Parish Clerk <colwallpcclerk@gmail.com>

Sent: 24 October 2019 10:27

To: Bailey, Josh <Joshua.Bailey@herefordshire.gov.uk>

Subject: {Spam?} Re- 193186 – Proposed erection of 1 no. residential dwelling at Checketts, Old Church Road, Colwall, Malvern, Herefordshire. Applicant:Ashton

Morning Josh

Please find below the Parish Councils comments to this application.:-

i) Re- 193186 – Proposed erection of 1 no. residential dwelling at Checketts, Old Church Road, Colwall, Malvern, Herefordshire.

Applicant: Ashton

IT WAS RESOLVED that Colwall Parish Council strongly objects to this application as it contravenes LD1 of the Herefordshire Council Core Strategy.

The proposed would not conserve and enhance the natural, historic and scenic beauty of the important landscape and features of the Malvern Hills AONB or the Conservation Area of Colwall.

The properties in Old Church Road, Colwall are characterised by large properties that sit within large plots with distinctive large trees, and the proposed would fundamentally alter the character of Checketts and the plot in which it sits.

Regards

Karen

Karen Davis
Clerk to Colwall Parish Council
Tel 01531 650542.

The information in this email is confidential and intended for the addressee only. If you have received this email in error please destroy. Colwall Parish Council has taken every reasonable precaution to ensure that any attachment to this email has been swept for viruses. However, we cannot accept liability for any damage sustained as a result of software viruses. Any views expressed in this email are solely that of the Author and do not necessarily represent Council policy.

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 26 March 2020 21:41
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Robert
Last name	Brain
Which plan are you commenting on?	Colwall
Comment type	Objection
Your comments	<p>I object to the current draft Neighbourhood Plan on the basis that amendment needs to be made, in that Grovesend field site should be removed. The vehicular access proposed via Old Church Road offers poor visibility into an already narrow lane with no pavements. Despite support given previously from local residents to a large scale development in Mill Lane, Grovesend field, which is in a conservation area continued to be incorporated in the draft NDP. It is my understanding that there is an application placed by a developer for a similar scale housing site, on Mill Lane. Reading through the details of their application, it is extremely apparent that the ideal location for a development of this size is indeed, Mill Lane where local amenities are close by, easy safe vehicular and pedestrian access and village school virtually on site. Ideal for young families. Knowing the area as I do I fully endorse removing Grovesend field site in favour of development on Mill Lane in Colwall NDP.</p>

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 24 March 2020 18:34
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Richard
Last name	King
Which plan are you commenting on?	Colwall
Comment type	Objection
Your comments	<p>I do not support the currently proposed NDP because the site proposed for 37 of the additional houses is Grovesend Farm. Instead, the Mill Lane site (for instance) adjacent to the Colwall C of E School would be far more suitable. My particular issues are:</p> <ol style="list-style-type: none">1. Grovesend Farm is in a Conservation Area (one of only a few in Herefordshire), and therefore we should protect it. It also has historical importance with industrial heritage on one side and listed buildings on another. It should not be considered for development when there are other better or equally good sites elsewhere.2. Grovesend Farm is unsuitable because it has very poor road (and pedestrian) access – the road network giving access to the site from the main Walwyn Road runs through narrow twisty roads with poor visibility and there would be serious safety concerns for both drivers and pedestrians.3. Unlike Grovesend, the Mill Lane site (with a development application already submitted) provides a much safer option, and much more convenient solution for young families with easy access to school and hall, and also better for older people with easy access to all the community activity associated with the Village Hall.4. The Mill Lane site has far better and safe pedestrian access to all village facilities via the new paths created for the school, and vehicular access off the upgraded Mill Lane.5. These

views were reflected in the past in both the 2012 SHLAA and in the 2015 version of the Colwall NDP: 6. The 2012SHLAA concluded that land at Grovesend Farm the local road network would not sustain intensification of use. For land adjacent to the village hall (and now school) some form of development was feasible. It is accessible and outside the floodplain. The plot highlighted in the 2012 plan was very large – new proposals (plus the new school) still do not encompass the whole plot. 7. In the 2015 version of the NDP, The Grovesend Farm site was identified as low to medium landscape capacity in the LSCA. It was not proposed to bring such areas forward, but in the same version it was put forward as an option for the new school. 8. In a subsequent full parish consultation, the parish voted 82 against 8 to support the new school plus housing on the Mill Lane site, but voted 56 against, and only 6 for. 9. At this point both Herefordshire Council and the Parish Council saw the Mill Lane site as suitable, and Grovesend Farm as less suitable. Both had similar assessment values regarding impact on the visual landscape (especially as viewed from the Malvern Hills).

Neighbourhood Planning Team
Herefordshire Council

25th March 2020

Issued by email only: neighbourhoodplanning@herefordshire.gov.uk

Dear Sir/Madam

Re: Colwall Neighbourhood Development Plan – Regulation 16 Submission Draft Consultation

We write in response to the consultation of the Colwall Neighbourhood Development Plan (CNDP) Submission Version dated January 2020.

Rosconn Strategic Land (RSL) welcome the opportunity to comment on the Draft CNDP and having reviewed the document and its supporting evidence, provide comments below. RSL represent the owners of land at Grovesend Farm that is proposed to be allocated for residential development under Policy CD3 of the CNDP and fully support this. However, we do wish to make a number of points for consideration as detailed below.

Policy CSB1 – Colwall Settlement Boundary

RSL support recognition within Policy CSB1 that residential development on site allocations and other areas within the settlement boundary will be permitted. RSL also support the intention to amend the settlement boundary in order to accommodate the proposed site allocations, as shown on Policies Map (Map 5).

The final paragraph of the policy however states that where possible, built form should respect and continue the existing building line and build up to the edge of the identified settlement boundary. It is not clear whether this requirement applies to all development proposals to include the site allocations, or otherwise solely to other infill/windfall sites within the settlement boundary. This is considered relevant in that the proposed allocation at Grovesend Farm under Policy CD4 involves an allocation for approximately 37 dwellings and is not therefore wholly capable of respecting or continuing the existing building line or otherwise avoid built development up to the edge of the settlement boundary. Indeed, the Indicative Layout at Appendix IV demonstrates as such. Therefore, for clarity, we would suggest that the final paragraph of the policy is amended to relate solely to development elsewhere within the settlement boundary and to exclude the site allocations.

Policy CD4 – Grovesend Farm

RSL fully support the identification of land at Grovesend Farm as a proposed housing allocation within the CNDP under Policy CD4 and confirm that the site is suitable,



available and achievable for housing development, and therefore consider there are no insurmountable constraints to the delivery of the site during the plan period.

The intention to allocate a housing site within the CNDP is considered to be well evidenced and justified, with the local community having been fully consulted throughout the preparation of the emerging Plan, whilst the selection of the most suitable sites to meet the housing needs within the community has followed a clear and consistent process that has considered all reasonable alternatives and based on a proportionate evidence base.

In general terms, RSL are supportive of the requirements of Policy CD4 itself, but wish to make the following points:

Indicative Layout – references are made within the explanatory text and policy itself to the Indicative Layout at Appendix IV. RSL would like to make it clear that this should not preclude an alternative layout for the site coming forward, provided this is generally in accordance with Policy CD4 and other relevant policies in the Plan.

Item 2 – this requires a safe and surfaced pedestrian and cycle link to the amenities and facilities of Colwall village. Whilst we are supportive of this objective in principle, reference is made to Appendix I (albeit there are no specific references to this appendix within the main body of the Plan). This relates to Highway Design and Minimising Traffic Impacts and starts at paragraph 1 by highlighting that part of the attractiveness of the area around Colwall is the apparent informality of its road network associated with its rural setting. In this context, it notes that modern engineering features can detract from the identified character and recognises the importance of new roads and associated features being designed and sited sensitively and only provided where absolutely necessary.

Paragraph 2 continues by stating that a balance needs to be struck between responding to the volume of traffic, safety and the impact on the landscape. In this regard, it states that 3 different design standards are to be used depending on their particular circumstances. Whilst DMRB is to be used in relation to the A449, the 'Malvern Hills AONB Guidance on Highway Design' is to be used on all other minor roads, whilst proposals inside and adjacent to the settlement boundary are to follow the techniques and philosophy contained in 'Traffic in Villages'. The latter is on the basis that such roads serve more purposes than just vehicles and form a 'place' in their own right where they should be designed to alter drivers' habits and redress the balance between vehicles and pedestrians.

In light of the above, we would suggest that this part of Policy CD4 is amended to make specific reference to the advice contained within Appendix I, so that there is a degree of flexibility to enable various options to be explored to identify the most appropriate way of achieving this objective so that the most sympathetic approach to preserving landscape character can be secured.

Item 4 – the policy makes reference to the density of development reflecting the existing settlement pattern. At paragraph 6.0.12, reference is made to net density of new development being 'about 20 dwellings per hectare' which has been used to inform the Indicative Layouts at Appendix IV. On the basis that Grovesend Farm extends to approximately 2.72 hectares and applying the definition of net density previously identified in PPS3¹, the Indicative Layout for 32 dwellings within the CNDP

¹ PPS3: Net dwelling density - Net dwelling density is calculated by including only those site areas which will be developed for housing and directly associated uses, including access roads within the site, private garden space, car parking areas, incidental open space and landscaping and children's play areas, where these are provided



would achieve a net density of 11.7 dwellings per hectare, whilst a development of 37 dwellings would equate to a net density of 13.6 dwellings per hectare. Therefore, both are well below the 20 dwellings per hectare advised as being appropriate within the settlement boundary. It is however noted that the Indicative Layout provides no public open space within the site.

Items 6 and 11 – both refer to land to the south and west of the site being provided as public open space to serve the proposed development and a requirement for there to be pedestrian and maintenance linkages to the western field from the proposed development. These are also shown on Map 5 and the Indicative Layout at Appendix IV, albeit there appears to be no pedestrian access shown to the field to the south on the latter.

The identification of these 2 areas of land proposed as Green Space in association with the Allocated Development Site at Grovesend Farm for housing is a new addition to the Plan, compared with the previous Regulation 14 version. As such, it is not something the Steering Group or Herefordshire Council have raised with the landowner, so this is the first time this has come to our attention. This is confirmed on the Illustrative Layout Plan which highlights that the new public open space to the west is 'subject to landowner agreement'. It is not therefore clear exactly why this action has been taken, albeit paragraph 6.4.2 states that the designation of land to the south as public open space is to serve the purpose of protecting this area from development in view of its local historic significance.

In light of the comments above in respect of Item 4 in terms of density, the justification for additional land adjacent to the housing allocation for the purposes of public open space is unclear when there is sufficient capacity within the site itself to accommodate this provision. Furthermore, notwithstanding the suggestion that the field to the south is to provide public open space to serve the proposed housing development, the justification appears to be in order to protect the adjacent land in view of its local historic significance. This does however appear to overlook the fact that this site is located outside the proposed settlement boundary and would not in any case be accessible from the proposed housing, as shown on the Indicative Layout.

It is therefore considered that the additional land to the south and west of the proposed housing allocation is unnecessary to serve the public open space requirements as this can be easily accommodated within the site itself. As such, RSL would request that the areas of proposed public open space to the west and south of the proposed housing allocation are omitted from the policy and corresponding plans.

Conclusions

In conclusion, RSL generally support the objectives and aspirations within the Draft CNDP. We are also fully support the intention to allocate our client's land under Policy CD4 to help meet the local identified housing needs of the village on the basis that the site is suitable, available and achievable, and is capable of contributing towards achieving sustainable development.

Notwithstanding, there are a number of matters that directly relate to the proposed allocation which may have implications for the viability and delivery of the site and in this respect, RSL are keen to raise these to ensure that the policies of the Plan accord with the strategic objectives of both national and local planning policy. These comments are therefore offered to assist in ensuring that the Plan is able to demonstrate compliance with the Basic Conditions to enable it to move forward to Examination and Referendum at the soonest opportunity. We are committed to working alongside the Steering Group and Council to achieve this objective and would



be more than happy to meet to discuss the content of this submission as and when appropriate.

If in the meantime there are any quires or further information is required, please do not hesitate to contact me.

Yours faithfully

Daniel Hatcher
Planning Director

Mobile: 07587 201372

E-mail: daniel@rosconngroup.com

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 26 March 2020 21:31
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Sara
Last name	Brain
Which plan are you commenting on?	Colwall
Comment type	Objection
Your comments	<p>Colwall's current Neighbourhood Plan supports the inclusion of GROVESEND FIELD. I state below why I feel very strongly opposed to this:- 1. The field site is within the AONB. As if this weren't important enough, this particular site, is in a Conservation Area and has listed buildings on its boundary. 2. The vehicular access to the proposed development of some 37 dwellings, is off Old Church Road. This road has no pavement and is already precarious for pedestrians and in some instances, very dangerous, particularly when two vehicles try to pass which in places is single track. 3. A planning application has been proposed in Mill Lane by a very reputable national house builder. The developers in their application for outline planning permission, have put forward a strong case for a development here (of the very same number of houses - 37) and I support this on the basis that there is excellent pedestrian access, amenities nearby and the school and village hall within yards and two smaller developments already established. Unlike Grovesend, this site is not in a conservation area. A far more suitable location and I support the Neighbourhood Plan being amended to remove Grovesend field and include Mill Lane in its place. This would fulfil the housing criteria in a far more feasible way. Furthermore, despite previous consultation of Colwall residents favouring</p>

	<p>Mill Lane as a more favourable location for a development of this size, Grovesend has still been incorporated in the draft NDP.</p>
--	--

**TO: DEVELOPMENT MANAGEMENT- PLANNING AND
TRANSPORTATION
FROM: ENVIRONMENTAL HEALTH AND TRADING
STANDARDS**



APPLICATION DETAILS

301335 /
Colwall Parish
Susannah Burrage, Environmental Health Officer

I have received the above application on which I would be grateful for your advice.

The application form and plans for the above development can be viewed on the Internet within 5-7 working days using the following link: <http://www.herefordshire.gov.uk>

I would be grateful for your advice in respect of the following specific matters: -

	Air Quality		Minerals and Waste
	Contaminated Land		Petroleum/Explosives
	Landfill		Gypsies and Travellers
	Noise		Lighting
	Other nuisances		Anti Social Behaviour
	Licensing Issues		Water Supply
	Industrial Pollution		Foul Drainage
	Refuse		

Please can you respond by ..

Comments

We have had sight of the proposed Colwall Neighbourhood Development Plan and have no comments with regard to what is proposed.

Signed: Susannah Burrage
Date: 25 February 2020

Latham, James

From: Andrew Dare
Sent: 27 March 2020 15:24
To: Neighbourhood Planning Team
Subject: Re: Colwall Neighbourhood Plan

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 Ms Banks,

I have been looking at the proposed Neighbourhood development Plan. I am surprised to see Grovesend Farm site is an allocated development site when it is in the Conservation Area and it's access would be onto Old Church Road, which is a narrow winding road, with all the resulting dangers.

The Mill Lane site around the new Primary school has better road access and is not in a Conservation Area, and I would have thought this would have been chosen in preference.

Yours Sincerely,

Sally Dare

From: donotreply@herefordshire.gov.uk
Sent: 27 March 2020 20:19
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Dr Sarah
Last name	Mather
Which plan are you commenting on?	Colwall Regulation 16 Draft NDP
Comment type	Objection
Your comments	<p>Dear Neighbourhood Planning Team, Please find my individual commentary regarding the request for feedback on the latest draft of the Colwall NDP. Whilst I am agreement with the concept of having an NDP and the need to meet the minimum housing growth targets – as we are in a protected AONB, I am objecting to the current recommendations of the latest draft plan. In particular I do not believe the process in the selection of sites for housing development reflects the strength of evidence and majority of consultation respondent feedback is not reflected in the draft plan. I have followed and supported the preferred process of attending and listening to plan authors and contributors and provided appropriate evidence, feedback and challenge in a timely fashion and when requested through the various development stages since 2013. However, I have been frustrated that my comments and those of the majority of respondents has not been considered and acted upon during these consultation process and stages. So I would like to formally challenge the current NDP process and design finalisation recommendations in a number of areas: • I do not believe the LSCA has been developed consistently and it should not be the only consideration in determining sites for Housing development. It has also changed over time without detailed explanation or in consultation with village</p>

residents. As a consequence Grovesend Field is included as a site for development in the latest plan even though it was excluded in earlier versions and the Mill Lane site area which was considered suitable for development in earlier plans has now been excluded. • A recent application for appropriate development on Mill Lane has been very strongly supported by a clear majority of village respondents – yet the Parish Council have rejected the application and excluded it as an option in the NDP. This happened even though a well constructed and appropriately designed proposal was formally submitted before the draft NDP was finalised and within 2 days of the Draft NDP being formally shared at the Colwall Village Hall. • Other key studies and documents such as Herefordshire Council’s own SHLAA recommendations and the English Heritage confirmation of the Colwall Conservation Area which highlighted Grovesend Field as a protected open space and the ‘green lung’ of the village do not seem to have been given the same consideration. • No landscape impact assessment has been completed for the Grovesend field development • In all village NDP discussion meetings and feedback the vast majority of respondents have provided feedback regarding the importance of highways, access and infrastructure in choosing sites for development. This does not seem to be considered in the draft plan recommendations with particular regard to the lack of suitability of Old Church Road to support future development • The draft plan does not offer alternative housing development options and sites for the village residents to provide feedback on and ultimately vote upon. During the process there have always been options available including A. The Mill Lane site, location near to services and highways links has much greater suitability for potential development B. A higher assumption on infill development. Recent average new house infill developments have been significantly higher than the projected average included in the plan. These developments are spread across the village and with appropriate planning could ensure diverse development and less pressure on particular locations and roads of bigger housing developments. A number of these 1

or few house development applications have been rejected by the PC when they could have contributed to the Plans housing targets. Both sites are fields within the AONB, and both are clearly visible from the Malvern Hills. However:

- Grovesend Field is within the Colwall Conservation Area and should be awarded greater protection;
- Grovesend Field is of historical importance to Colwall with the remains of Colwall's industrial heritage in the southern section and is bordered by listed buildings to the north;
- Grovesend Field has poor access, meaning increased traffic will impact on Stone Drive, Old Church Road, Oak Drive, and the awkward junctions with Mathon Road and Walwyn Road. Old Church Road is narrow and lacks a pavement, making future residents of any development less likely to walk to the village, and the ongoing safety of current pedestrian users is also a concern.
- The Mill Lane site provides a safer and more sustainable option, with excellent pedestrian access to key amenities including the school, village hall, scout hut, village shops and public transport on Walwyn Road / the station. Any vehicle traffic accesses Walwyn Road directly, via a well designed junction with excellent sight lines. I would be very happy to provide any additional info on request

Regards Dr Sarah Mather

Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment

From Herefordshire Council Strategic Planning Team

Name of NDP: Colwall- Regulation 16 submission draft

Date: 21/02/20

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
<i>CSB1- Colwall Settlement Boundary</i>	SS1; SS6; RA1; RA2	Y	
<i>CD1- Protecting Exceptional Key Views</i>	SS6; LD1	Y	
<i>CD2- General Design Principles for Development within Colwall Settlement Boundary</i>	SS1; LD1; LD2; LD3; LD4; SD1; SD2; SD3; SD4	Y	<p>It is considered that some design principles could be outlined in a more concise manner here. This would give the policy a less prescriptive appearance.</p> <p>For instance, points 13, 14 and 15 appear to be encouraging broadly similar principles, could these be presented as one broader criterion?</p>
<i>CD3- Site 1 Former Primary School and adjacent land (Target- approximately 9 houses)</i>	SS1; LD1; LD2; LD3; LD4; SD1; SD2; SD3; SD4	Y	
<i>CD4- Site 2 Grovesend Farm (Approximately 27 houses)</i>	SS1; LD1; LD2; LD3; LD4; SD1; SD2; SD3; SD4	Y	<p>It should be noted that this was assessed as part of a larger site in the 2012 Strategic Housing Land Availability Assessment (SHLAA). It was not considered appropriate for development due to concerns over the ability of the road network to sustain intensification of use.</p> <p>Though a smaller area is proposed for allocation, in the</p>

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
			event of a proposal this issue would be considered.
<i>CD5- General Design Principles for Development in the Wider Countryside</i>	SS1; LD1; LD2; LD3; LD4; SD1; SD2; SD3; SD4	Y	(Excl CD7) As with CD3, there are some very detailed and prescriptive design principles given. It is considered that these could be condensed into more concise, broader design principles.
<i>CD6- Farmsteads</i>	SS1; RA5	Y	
<i>CD7- Protecting Archaeology</i>	SS6; LD4	Y	
<i>CD8- New Agricultural Buildings</i>	SS1; RA3; RA4; RA6	Y	
<i>CD9- Polytunnels</i>	SS1	Y	
<i>CH1- Range and Mix of Housing</i>	SS1; H3	Y	
<i>CF1- Supporting a Range of Goods and Services in the Village Centre</i>	SS1; SC1	Y	
<i>CF2- Recreation Facilities and Open Space</i>	SS1; OS1; OS2; OS3	Y	
<i>CF3- Local Green Space</i>	SS1; OS1	Y	
<i>CRE1- Renewable Energy Schemes</i>	SS1; SD2	Y	

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 16 March 2020 16:26
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Sylvia
Last name	Stringer
Which plan are you commenting on?	Colwall Neighbourhood Development Plan
Comment type	Objection
Your comments	The Grovesend Field site off Old Church Road is a ridiculous place to develop considering the narrow roads surrounding it and the terrible access to it. The Mill Lane site is much more logical, safe and easily accessed by cars and pedestrians.

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 20 March 2020 15:33
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Stephen
Last name	West
Which plan are you commenting on?	Colwall
Comment type	Objection
Your comments	<p>As a resident of many years, using the Old Church Road to drive, cycle and walk, the proposal to develop Grovesend Field, rather than the land by the school, gives me a great deal of concern; concern for the safety of road users, including pedestrians, children walking to school etc. Additionally, such a commencement of development on Grovesend will, I feel, destroy the rural feel of this part of the village. The alternative near the school is a vastly more sensible site for residential development, safe access to the road network. It would permit a much greater degree of road user and pedestrian safety, link in with the better and wider roads, and the general nature of that part of the village. Furthermore, there are wildlife considerations. As a professional ecologist of high standing, I assert that the value and connectivity of Grovesend Field for wildlife such as woodpeckers, greater and lesser horseshoe bats and hedgehogs is considerably more significant than that residual on the already disturbed land near the school. I object to the development of Grovesend Field wholeheartedly.</p>

Latham, James

From: Si Hewitt
Sent: 26 March 2020 17:25
To: Neighbourhood Planning Team
Subject: Objection to Colwall NDP

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.

Hello my name is Simon Williams-Hewitt

I would like to object to the 2020 version of the Colwall NDP as I believe on important land allocation decisions it has taken the wrong direction.

The plan to have both school and housing off Mill Lane had excellent support from the village. The change that Land off Mill Lane could then not be used for housing does not seem to be a village decision, but forced upon us.

The Grovesend Farm site accessed off Old Church Road means pushing more traffic through narrow lanes. Mill Lane has none of these issues. That there is no proposed way in the NDP to deliver this undermines the suitability of the site.

Grovesend Farm was identified as an important green space in village plans, and forms part of the Colwall Conservation area. So to therefore recommend its use for housing development goes against this.

Thanks

Simon

20 February 2020

Our ref: Colwall 2

Dear Sir/Madam

Colwall Neighbourhood Development Plan 2011 - 2031

Thank you for the opportunity to comment on your consultation, we have the following comments to make on your Neighbourhood Plan.

Policy CD2 General Design Principles for Development within Colwall Settlement Boundary –

Site Layout and access design - Severn Trent is supportive subsection 5 of the minimisation of hard surfacing and the recommendation to use more permeable options – this is because of the benefits that can be achieved to flood risk reduction through the management of surface water through more permeable options.

However we believe that your policies should go further and the inclusion of a specific section on Surface Water Drainage and Sustainable Urban Drainage (SuDS) should be included. We recommend the inclusion of additional policy wording which states the following:

'All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are put in place unless demonstrated to be inappropriate. All schemes for the inclusions of SuDS should demonstrate they have considered all four aspects of good SuDS design, Quantity, Quality, Amenity and Biodiversity, and the SuDS and development will fit into the existing landscape. The completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure that the SuDS are maintained in perpetuity.'

All applications for new development shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, in such that a discharge to the public sewerage systems are avoided, where possible. The drainage hierarchy (Planning Practice Guidance Paragraph 80) states that surface water should be discharged according to the hierarchy of 1) into the ground (infiltration), 2) to a surface water body, 3) to a surface water sewer, highway drain or another drainage system, 4) to a combined sewer.'

Building design – Within this section we believe it is important to include a policy relating to water efficiency in building design. New development will result in a need for an increase in the amount of water to be supplied across the Severn Trent region, and issues with the sustainability of some of our water sources are placing supply resilience at risk. We are supportive of the use of water efficient fittings and design within new developments, this is supported by National Planning Policy Framework Paragraph 149 'Plans should take a proactive approach to mitigating and adapting to

climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures'. We therefore encourage the inclusion of the following wording:

'Development proposals should demonstrate that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day. Developments should demonstrate that they are water efficient, where possible incorporating innovative water efficiency and water re-use measures.'

Policy CD3 – Surface water should be managed sustainably on site through SuDS and it is important that the drainage hierarchy is followed. There are known hydraulic flooding incidents in the downstream network and with additional housing commitments downstream it will be important that the developer contacts Severn Trent at the earliest opportunity to determine the impact of this development on the foul sewer network.

Policy CD4 - Surface water should be managed sustainably on site through SuDS and it is important that the drainage hierarchy is followed. There is a watercourse adjacent to the site which would provide a potential surface water outfall. There are known hydraulic flooding incidents in the downstream network and with additional housing commitments downstream it will be important that the developer contacts Severn Trent at the earliest opportunity to determine the impact of this development on the foul sewer network.

Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice. For your information we have set out some general guidelines that may be useful to you.

Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

Sewage Strategy

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

Surface Water and Sewer Flooding

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

Water Quality

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

Water Supply

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

Water Efficiency

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.

- Hand wash basin taps with low flow rates of 4 litres or less.
- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

We hope this information has been useful to you and we look forward in hearing from you in the near future.

Yours sincerely

Rebecca McLean

Strategic Catchment Planner

growth.development@severntrent.co.uk

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 27 March 2020 20:00
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Tiffanie
Last name	Stephens
Which plan are you commenting on?	COLWALL REGULATION 16 DRAFT NDP
Comment type	Objection
Your comments	<p>Dear Neighbourhood Planning Team, My name is Miss Tiffanie Stephens and I have been involved in the Colwall NDP process and the future plans for the village discussions. I am offering my comments as an individual and I also believe as a representative of the young adult population segment. Please find my individual commentary regarding the request for feedback on the latest draft of the Colwall NDP. Whilst I am agreement with the concept of having an NDP and the need to meet the minimum housing growth targets – as we are in a protected AONB, I do not support the current recommendations of the latest draft plan. In particular I do not believe the process in the selection of sites for housing development reflects the strength of evidence and majority of consultation respondent feedback is not reflected in the draft plan. I have followed and supported the preferred process of attending and listening to plan authors and contributors and provided appropriate evidence, feedback and challenge in a timely fashion and when requested through the various development stages since 2013. However, I have been frustrated that my comments and those of the majority of respondents has not been considered and acted upon during these consultation process and stages. So I would like to formally</p>

challenge the current NDP process and design finalisation recommendations in a number of areas:

- I do not believe the LSCA has been developed consistently and it should not be the only consideration in determining sites for Housing development. It has also changed over time without detailed explanation or in consultation with village residents. As a consequence Grovesend Field is included as a site for development in the latest plan even though it was excluded in earlier versions and the Mill Lane site area which was considered suitable for development in earlier plans has now been excluded.
- A recent application for appropriate development on Mill Lane has been very strongly supported by a clear majority of village respondents – yet the Parish Council have rejected the application and excluded it as an option in the NDP. This happened even though a well constructed and appropriately designed proposal was formally submitted before the draft NDP was finalised and within 2 days of the Draft NDP being formally shared at the Colwall Village Hall.
- Other key studies and documents such as Herefordshire Council’s own SHLAA recommendations and the English Heritage confirmation of the Colwall Conservation Area which highlighted Grovesend Field as a protected open space and the ‘green lung’ of the village do not seem to have been given the same consideration.
- No landscape impact assessment has been completed for the Grovesend field development
- In all village NDP discussion meetings and feedback the vast majority of respondents have provided feedback regarding the importance of highways, access and infrastructure in choosing sites for development. This does not seem to be considered in the draft plan recommendations with particular regard to the lack of suitability of Old Church Road to support future development
- The draft plan does not offer alternative housing development options and sites for the village residents to provide feedback on and ultimately vote upon. During the process there have always been options available including A. The Mill Lane site, location near to services and highways links has much greater suitability for potential development B. A higher assumption on infill development. Recent

average new house infill developments have been significantly higher than the projected average included in the plan. These developments are spread across the village and with appropriate planning could ensure diverse development and less pressure on particular locations and roads of bigger housing developments. A number of these 1 or few house development applications have been rejected by the PC when they could have contributed to the Plans housing targets. Both sites are fields within the AONB, and both are clearly visible from the Malvern Hills. However:

- Grovesend Field is within the Colwall Conservation Area and should be awarded greater protection;
- Grovesend Field is of historical importance to Colwall with the remains of Colwall's industrial heritage in the southern section and is bordered by listed buildings to the north;
- Grovesend Field has poor access, meaning increased traffic will impact on Stone Drive, Old Church Road, Oak Drive, and the awkward junctions with Mathon Road and Walwyn Road. Old Church Road is narrow and lacks a pavement, making future residents of any development less likely to walk to the village, and the ongoing safety of current pedestrian users is also a concern.
- The Mill Lane site provides a safer and more sustainable option, with excellent pedestrian access to key amenities including the school, village hall, scout hut, village shops and public transport on Walwyn Road / the station. Any vehicle traffic accesses Walwyn Road directly, via a well designed junction with excellent sight lines.

Regards Miss
Tiffanie Stephens

Latham, James

From: Valda Bridges
Sent: 25 March 2020 12:00
To: Neighbourhood Planning Team
Subject: Colwall neighbourhood development plan. Attn Ms Banks

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.

25.03.2020

Dear Ms Banks

I am concerned about the possible housing development on Grovesend field as opposed to Mill Lane, in Colwall.

Grovesend field is in the conservation area in Colwall, whereas the Mill Lane site has always been the popular choice for development with local residents.

Access to Grovesend field is very poor. Old Church Road is narrow and has listed buildings and trees to either side. Stone Drive is always congested with chemist and doctor's surgery located there, as well as parking on the road. There is no pedestrian access apart from Old Church Road which is too narrow for a pavement.

The Mill Lane site has excellent vehicular and pedestrian access.

In my opinion, the logical choice for housing development in Colwall is the Mill Lane site.

Yours sincerely

Valda Bridges

Sent from my iPad

Latham, James

From: Hammond, Victoria
Sent: 19 March 2020 13:43
To: Neighbourhood Planning Team
Subject: RE: Colwall Regulation 16 submission neighbourhood development plan consultation

Dear NPT,

Please find comments on the Colwall Reg NDP below:

Development control comments:

- Page 42 – Point 5 – The first 5m off the public highway should be of a consolidated/hard material such as tarmac or block paving, gravel is not acceptable to the local highway authority (LHA) for the first 5m. Gravel will also not be suitable for areas to be adopted by the LHA.
- Page 45 – Point 24 – Car parking should be adequately screened whilst maintaining visibility splays.
- Page 50 – Policy CD4 Site 2 Grovesend Farm – Point 2 – Can this be achieved?
- Page 82 – Point 2 – Malvern Hills AONB Guidance on Highway Design and Herefordshire Council’s Highway Design Guide for New Developments.
- From Page 83: 4. Use ‘flag signs’ to indicate side roads. Traditional finger posts and milestones should be retained wherever possible.
 - What does this mean in practice? For all side roads in the village? Does this mean local direction signage opposite junctions in lieu of warning signage etc. Some elaboration may be useful.
- From Page 83: 7. Public lighting should be dimmed as per HC policy for whole county
- From Page 83: 9. Road surfacing should use local stone.
 - Again, what does this mean, what is considered local in this context (e.g. is Kington local?). The LHA will have some specifications for materials that are unachievable for some quarries so understanding the meaning of this would be helpful. It may be an appearance led requirement which would benefit from clearer wording
- Page 91 – Indicative layout – Avoid planting in visibility splays and a turning head should be provided.
- Page 92 – Indicative layout – A turning head should be provided.

General comments:

- It might be wise to consider referencing MfS/MfS2 as part of the design standard as it’s a national document and likely to form the cornerstone for an appeal in the event that an application goes that way.
- Main comment relates to the fact that they have a good Appendix 1 on Highway Design & Minimising Traffic Impacts, but don’t appear to refer to it in the main part of the document. It’s difficult to see how this is part of or even acknowledged the policies developed within the plan. For example, you would expect to see it referred to in the development strategy and site policies in section 6, such as Site Layout in Access design in Policy CD2 - General Design Principals for Development, Highway and Access Design in CD3, CD4 etc.
- How the appendix integrates / supports the Malvern Hills AONB equivalents would also be helpful (rather than just a reference to it in 4.16).
- Highway Design & Minimising Traffic Impacts might also have featured as one of the Aims of the 2031 Vision for Colwall, perhaps.
- A minor point: Some aims appear to have dropped off the list (e.g in 6.2, the first aim is Aim 2).

Many thanks
Vicky

Regulation 16 Colwall NDP

Group Response

March 2020

Contributors

The following Colwall residents have written, contributed to and endorsed this response. This document accompanies their individual representations to the Reg 16 consultation.

Name	Address
Mr G Beard	
Mrs N Beard	
Mrs A Richardson	
Mr B Richardson	
Mr C Stephens	
Mrs A Stephens	
Miss E Stephens	
Miss C Stephens	
Miss T Stephens	
Mr R King	
Mrs P King	
Mr P Bridges	
Mrs V Bridges	
Mr M Fryer	
Mrs H Fryer	
Mrs S Brain	
Mr R Brain	
Ms J Cooke	
Mr R Beard	
Mrs K Beard	
Dr J Mather	

Dr S Mather	
Miss I Mather	
Mr J Mather	
Dr J Giess	
Mr B Hawes	
Mrs W Hawes	
Ms F Campbell	

Introduction

This is a group representation in response to the Regulation 16 consultation on the 2020 Submission Draft Colwall Neighbourhood Development Plan (NDP). It has been written by local residents who have significant concerns about the process used to create the draft NDP and also how some important decisions have been made by the Parish Council. This representation also needs to be read alongside the Group's previous representation to the Regulation 14 NDP draft (2018). This is provided at Appendix B.

We understand that the Colwall NDP must meet basic conditions, which include:

- Having regard to national policies and advice contained in guidance issued by the Secretary of State;
- That the NDP contributes to sustainable development;
- That the NDP is in general conformity with the strategic policies contained in the relevant development plan (the Herefordshire Local Plan Core Strategy);
- That the NDP does not breach and is otherwise compatible with EU obligations, and its making is not likely to have a significant effect on a European site, either alone or in combination with other plans or projects.

This representation seeks to demonstrate that the current draft of the NDP does not meet these basic conditions as it does not accord with national / local plan policy and it does not contribute to sustainable development, as detailed below.

For clarity, this representation is divided into two parts:

Part 1 documents the U-turn that has taken place with respect to the allocation of NDP housing sites, and describes our concerns over the processes applied in progressing the NDP including:

- Ignoring Herefordshire Council SHLAA evidence;
- The LSCA-led approach to site selection to the exclusion of other important site considerations;
- Concern over the robustness of the LSCA approach;
- The lack of true community engagement in the preparation of the LSCA evidence and in the progression of the NDP.

Part 2 objects to the identification of 'Land at Grovesend Farm' as a housing allocation in the Colwall NDP and instead promotes 'Land Adjacent to the new Primary School and Village Hall on Mill Lane as a more sustainable and deliverable housing site.

We recognise the need for new housing and the benefits of an NDP, and would like to work with Colwall Parish Council to achieve this. However, we do not believe we (or the local community as a whole) have been afforded that opportunity to date and therefore we strongly object to the REG 16 Draft NDP.

Part 1: U-turn regarding Colwall NDP Housing Allocations

A U-turn was taken by Colwall Parish Council with regards to the allocation of housing sites as identified in the 2015 Draft NDP and the subsequent 2018 Reg 14 NDP, which has led to, among other changes, 'Land adjacent to the Village Hall, Mill Lane' being removed as a potential housing site and it being replaced by 'Land at Grovesend Farm, Old Church Road'.

The following provides a commentary on how this U-turn happened and our associated concerns with regards to the process applied by the Parish Council in the identification of housing sites in the Colwall NDP.

1.1 – 2012 Herefordshire Council Strategic Housing Land Availability Assessment (SHLAA)

In the Herefordshire Council 2011 and 2012 SHLAA (link below) it was concluded that:

- Land at Grovesend Farm (SHLAA 2012 Appendix 11, page 29 of 53) ref HLAA/004/004 – Conclusion:

'The local road network would not sustain intensification of use.'

This land was ruled out on highway grounds as a potential site for development.

- Land adjacent to Colwall Village Hall (SHLAA 2012 Appendix 10, page 18 of 29) ref 0/Col/007, and 'summary_schedules_for_rscs_and_hubs.pdf' (page 4 of 31) – Conclusion:

'Yes, some form of development would appear feasible here. Accessible and outside the flood plain. Far too large if considered in totality.'

It should be noted that the field at Mill Lane has never been proposed for use in totality. On completion of the new school on part of the site, a hedgerow was planted across the remaining land, with the expectation that only the land closest to the school would be developed for housing.

https://www.herefordshire.gov.uk/downloads/download/596/strategic_housing_land_availability_assessment_2012_planning_documents

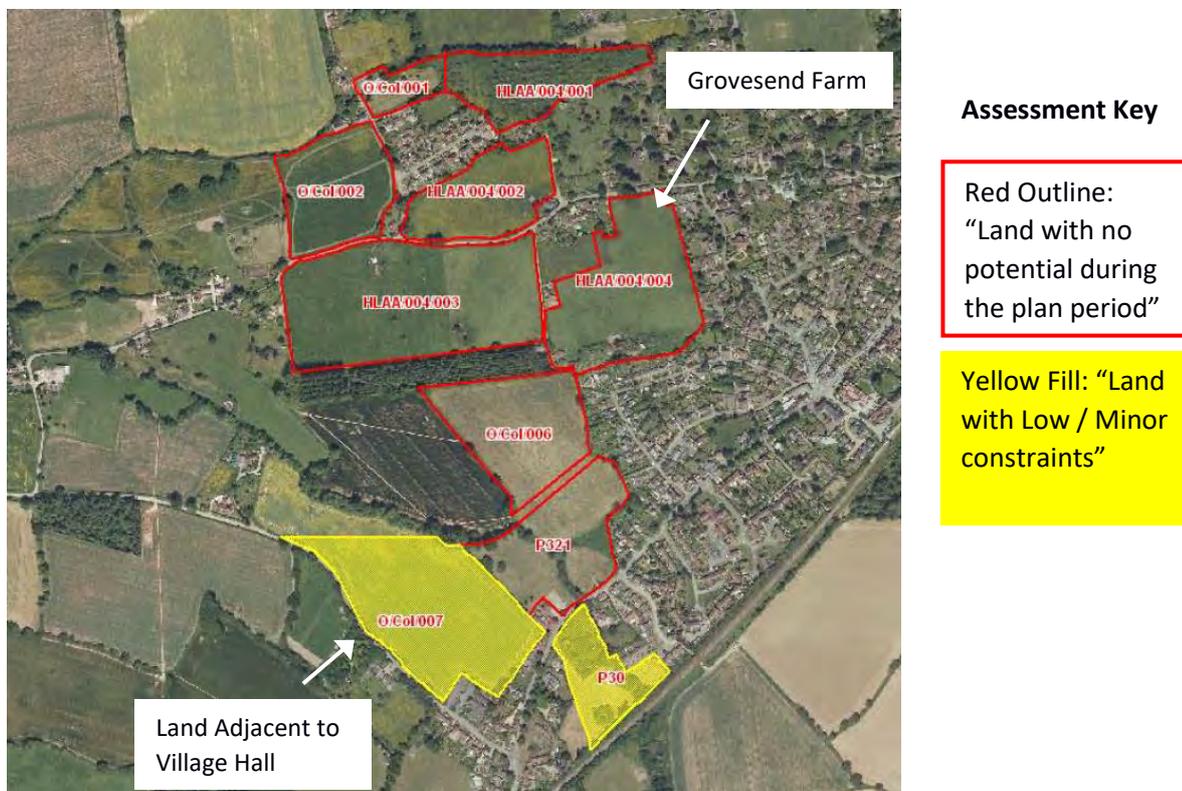


Figure 1.1 – Colwall Map from 2012 SHLAA

1.2 – 2015 Draft Colwall NDP Proposed Housing Sites

The 2015 Draft NDP used the findings of the 2013 Landscape Sensitivity Capacity Assessment (LSCA) to identify potential housing sites. Map 4 (Figure 1.2.1 below) of the 2015 Draft NDP identified the sites assessed through the LSCA, which lie on the edge of the Colwall settlement, and their 'capacity' for development.

'Land adjacent to the Village Hall, Mill Lane' was shown in the NDP as LSCA Site 9A / eastern part of Site 9. Site 9 was identified as having a capacity to accommodate development of Low to Medium and Site 9A having a capacity to accommodate development of Medium to High. The 'Land at Grovesend Farm' (Area 12) was left in white on Map 4 (Figure 1.2.1), with no capacity information shown. This position reflected the 2013 LSCA Site Schedule which did not consider the site appropriate for housing development as detailed below.

Map 5 (Figure 1.2.2 below), on page 24 of the 2015 Draft NDP, shows the original Unitary Development Plan (UDP) settlement boundary for Colwall, along with a number of proposed extensions. These extensions represented proposed housing sites identified in the 2015 Draft Plan in order to accommodate Colwall's housing requirement and were also shown on Map 9.

Para 6.1.9 of the 2015 Draft NDP stated that:

'Five modest extensions to the existing settlement boundary in the Herefordshire UDP were proposed, to include those parcels of land which are identified in the LSCA study as being of medium to high and medium to high / medium and medium landscape capacity.'

Para 6.1.10 stated that:

'Parcels of land which were identified as medium / low to medium, low to medium, low to medium / low and low landscape capacity were not included on the grounds that the impacts of new development would have an unacceptable impact on this highly sensitive landscape regardless of the Core Strategy development target.'

One of these extensions to the UDP settlement boundary included 'Land adjacent to the Village Hall' (Site 9A / eastern part of Site 9 of the 2013 LSCA (Figure 1.2.1) and Area 3 on Map 9 Draft NDP 2015, Figure 1.2.3), which was identified as a proposed housing site. It is noted, however, that the western part of Land adjacent to the Village Hall, Mill Lane (Area 3 in Figure 1.2.3) formed the eastern part of Site 9 in the 2013 LSCA, which was identified as having low to medium potential. Despite this, and in conflict with paragraph 6.1.10, above, was still identified as part of the proposed allocated housing site in Policy CD5 for 16 houses.

Grovesend Farm was left outside the settlement boundary and was not included as a possible site for housing development. This position was further supported in the 2013 LSCA assessment table at page 25 (link below) where the assessment for Site 12 (Grovesend Farm) stated that:

'built development likely to have adverse effects on landscape character / visual amenity – area is not recommended for consideration.'

<http://www.colwallneighbourhoodplan.org.uk/Documents/Colwall%20LSCA%20Stage%202%20Report%20Sept13.pdf>

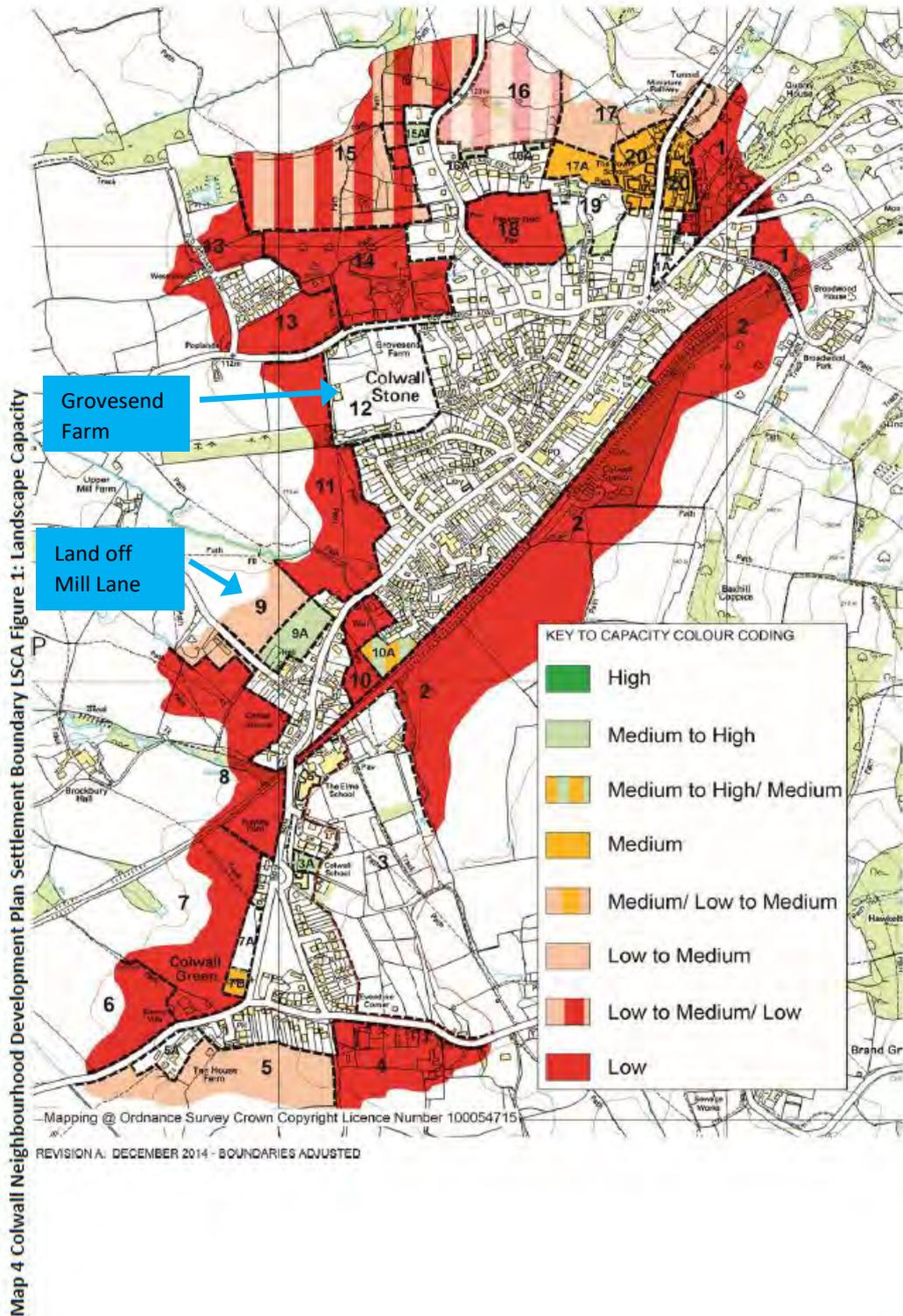


Figure 1.2.1 – LSCA Landscape Capacity Map (Map 4 from 2015 Draft Colwall NDP). Grovesend farm was included in the LSCA assessment.



Figure 1.2.2 – Former UDP settlement boundary and proposed extensions (Map 5 from 2015 Draft Colwall NDP)

1.3 – 2015 Draft Colwall NDP New School Site Options

In addition to identifying potential housing sites, the 2015 Draft NDP included a consultation on the following options for a new school site:

Option 1: The existing school site – a plan with a site boundary was provided showing the potential site with the existing school site being retained for educational use.

Option 2: Adjacent to the Village Hall, Mill Lane – The site adjacent to the Village Hall was identified for a mixed use development including a new school, community / recreational facilities and housing. No site boundaries were provided identifying the development limits of the site.

The 2015 Draft NDP identified the following benefits and negatives for development of the land off Mill Lane:

Benefits

- *Better central location within the community, enabling better connections with community*
- *No disruption on the existing school's delivery of educational services*
- *Cleanest option and sequencing of works*
- *Positive with Planning Services*
- *Shared site with existing community facilities*
- *Better transport links and encouragement for walk to school policy*
- *Anticipated good ground conditions & topography*

Negatives

- *No known services provided to the site - electric, gas, water and waste*
- *The site is an unknown site in terms of site conditions*
- *There are unknown parties that would need to be engaged with incorporating a potential risk factor*
- *Loss of the original school site and local heritage*
- *New relationship with the Diocese will likely need to be negotiated.*

Option 3 – Grovesend Farm – The land at Grovesend Farm was identified as a possibility for the development of a new primary school only (no mixed use or housing development was mentioned). No site boundaries were provided identifying the development limits of the site.

The 2015 Draft NDP identified the following benefits and negatives for development of the site:

Benefits

- *No disruption on the delivery of education from the existing temporary school buildings*
- *Greenfield site with potential for easy sequencing of works*

Negatives

- *Highways & access limitations given existing infrastructure*
- *No known services provided to the site - electric, gas, water and waste*
- *The site is an unknown site in terms of site conditions*
- *There are unknown parties that would need to be engaged with incorporating a potential risk factor*
- *Loss of the original school site and local heritage.*

As detailed above, Map 4 (Figure 1.2.1) of the 2015 Draft NDP did not show the landscape capacity details of the Grovesend Farm land. However, the following paragraph in the 2015 Draft NDP identifies the site as being of medium / low to medium landscape capacity and this is reflected in Revision A to the LSCA map (link below). The land at Grovesend Farm was only considered as an option for a

school development (and not for housing) and recognised the negatives of the site which included *'highway and access limitations'*.

<http://www.colwallneighbourhoodplan.org.uk/Documents/LSCA%20FIGURE%201%20-%20Landscape%20Capacity%20Plan%20Rev%20A.pdf>

Para 6.5.11 of the 2015 Draft NDP stated that:

'This site (Grovesend Farm) lies within an area identified as medium / low to medium landscape capacity in the Settlement Boundary Landscape Sensitivity and Capacity Assessment, 2013 and it was not proposed to bring such areas forward for development in the NDP at this stage. Only if other sites do not come forward over the first 5 years of the Plan, would this area be considered as part of a review of the Plan.'

We would like to understand why, given that the land at Grovesend Farm was not considered suitable for housing development, based on the land's identified shortcomings in the SHLAA, the LSCA site schedule, the 2015 Draft NDP and highway constraint restrictions, the same 2015 Draft NDP then identifies the land as a potential school site and also a potential reserve site for housing if *'other sites do not come forward for development'*.

1.4 – Consultation Response to 2015 Draft NDP

Following consultation with the local community on the 2015 Draft NDP, the feedback was analysed by the Parish Council and compiled into a response table. This is the only time the village has been asked for its preference on sites. The number of responses related to 'Land adjacent to the Village Hall, Mill Lane' and 'Grovesend Farm' are summarised below:

Q8 (Policy CD5) – Housing adjacent to the Village Hall, Mill Lane – 65 support, 7 object

Q17.2 – School plus housing adjacent to the Village Hall, Mill Lane – 82 support, 8 object

Q17.3 – School on Grovesend Farm – 6 support, 56 object

In summary, the 'Land adjacent to the Village Hall, Mill Lane' was strongly supported for housing, or school plus housing. The land at 'Grovesend Farm' was strongly rejected as a site for the school. The option of there being housing on Grovesend Farm was not even put forward for community consideration and comment.

Whilst it cannot be predicted what the response would have been had the question have been asked regarding the development of the land at Grovesend Farm for housing, many of the issues related to having the school built there would also be applicable to a significant development of houses.

<http://www.colwallneighbourhoodplan.org.uk/Documents/Colwall%20Draft%20Neighbourhood%20Development%20Plan%20v5a.pdf>

<http://www.colwallneighbourhoodplan.org.uk/Documents/First%20Draft%20Results%20and%20Representations.doc>

1.5 – 2018 Regulation 14 Consultation Colwall NDP

No further community consultation was undertaken until the Reg 14 NDP was issued for consultation in 2018. This was accompanied by a revised LSCA (2018), Figure 1.5.1 below, which included fundamental changes to the capacity rating of various sites, including 'Land adjacent to the Village Hall, Mill Lane' and 'Grovesend Farm'.

It is documented that this 2018 LSCA was informed, in part, by new developments in Colwall that had occurred between 2015 and 2018. These included:

- Application ref P161407/F, The new primary school built on LSCA Area 9a, which had previously formed part of the proposed school / housing site, i.e. 'Land adjacent to the Village Hall Site, Mill Lane' (Area 3) in the 2015 Draft NDP;
- Application ref P170278/O, Land next to / behind the Thai restaurant (Part of LSCA Area 11) which was of the most sensitive LSCA category, however the development of the site was supported by Herefordshire Council and planning permission was granted.

In addition, the revised LSCA also included further detailed review of Area 12 at 'Grovesend Farm', splitting the site into two areas with different capacity ratings as shown in Figure 1.5.1.

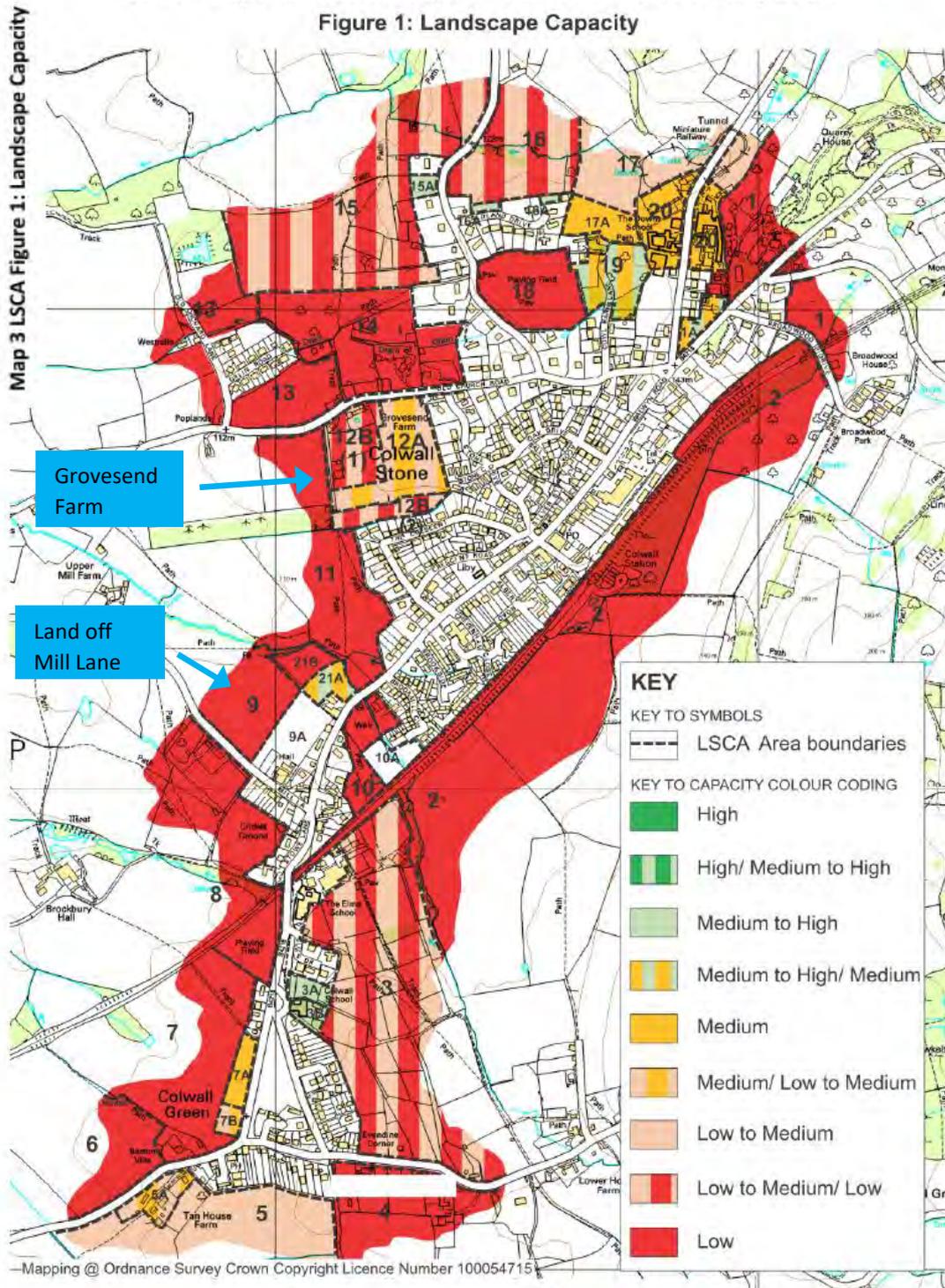
As already noted, Grovesend Farm was assessed as having no potential for development in the 2011 and 2012 SHLAA, the 2013 LSCA, and the 2015 Draft NDP. It was therefore very unexpected to see the land included in the 2018 Regulation 14 version of the Colwall NDP as a proposed housing site for around 37 houses (Figure 1.5.2 below).

Furthermore, 'Land adjacent to the Village Hall, Mill Lane' was simultaneously and unexpectedly removed as a potential housing site from the 2018 Reg 14 NDP, despite being well supported in the 2015 NDP consultation for a school plus housing.

This U turn on the identification of housing sites, at the Reg 14 stage, appears to have been based purely on a revision of the landscape evidence. The 2018 LSCA reassessed the capacity of sites and in turn this changed the sites' potential to accommodate development as shown in the differences between Fig 1.2.1 and Fig 1.5.1.

Colwall Neighbourhood Development Plan Settlement Boundary LSCA

Figure 1: Landscape Capacity



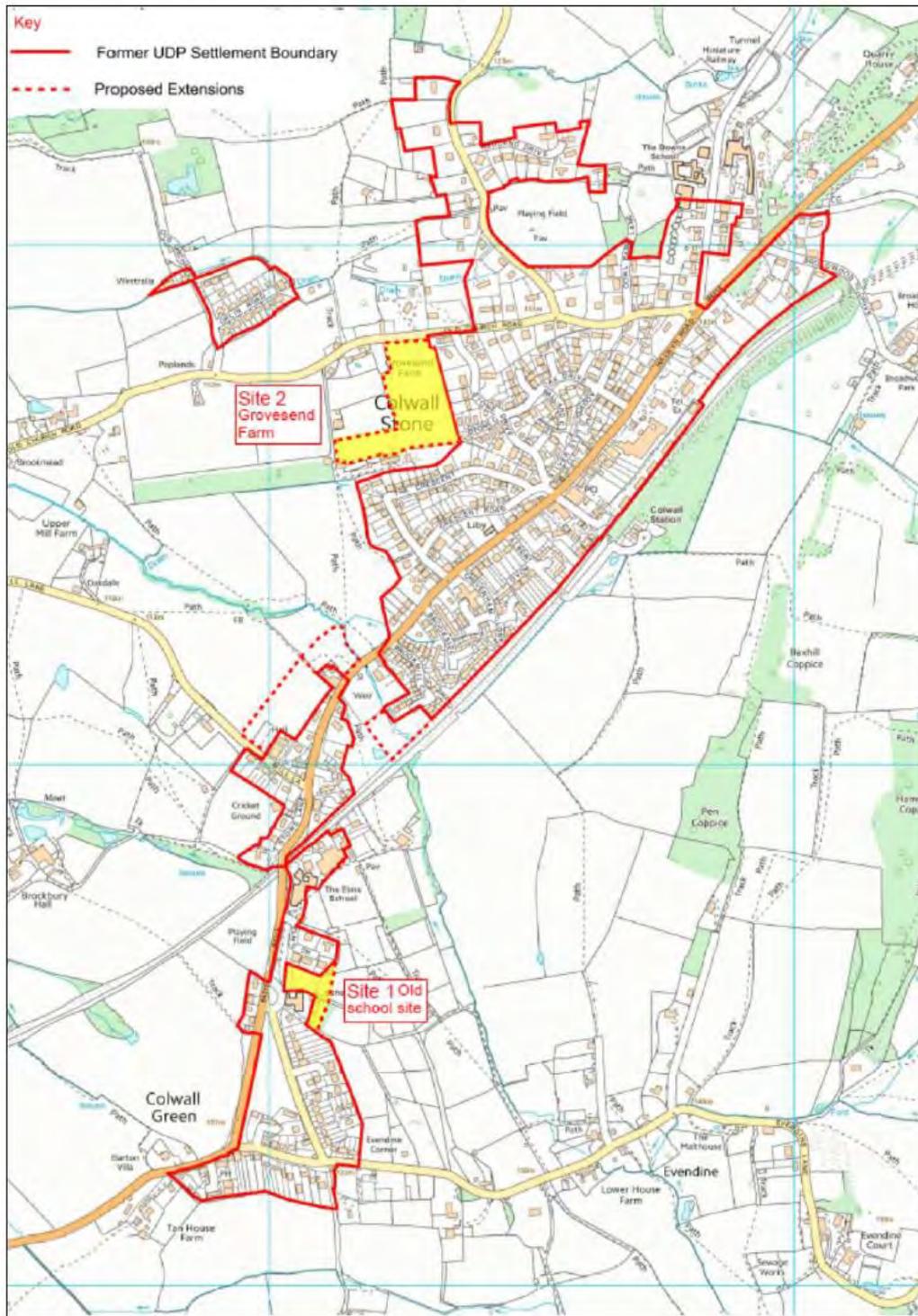
25

Carly Tinkler BA CMLI FRSA for Colwall Parish Council January 2018

Not to Scale

Figure 1.5.1 – LSCA Landscape Capacity Map (From 2018 Draft Colwall NDP)

Map 4 Former UDP Settlement Boundary and Proposed Extensions



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Figure 1.5.2 – Former UDP settlement boundary and proposed extensions (From 2018 Draft Colwall NDP)

The Regulation 14 NDP was subject to consultation and many representations were submitted objecting to this U-turn on housing sites as well as to the allocation of Grovesend Farm for housing on highway capacity constraints, its location in the Conservation Area, and its poor connectivity to the village's services and facilities as detailed in the response table prepared by the Parish Council.

The Parish Council's Reg 14 response to this U-turn, and to queries on why 'Land adjacent to the Village Hall, Mill Lane' had been removed as a housing site from the Reg 14 NDP, was made 17 times in the Parish Council response to representations table (e.g. p246 of 389) as follows:

'that HC initially proposed a mix development of a school and housing and this was the scheme taken to public consultation. Subsequently after Mill Lane has been selected for the school. HC decided to only build the school so no houses were built. The new school changed the landscape character of the surrounding land and as a result the LSCA had to be amended. In the reassessment LSCA the capacity of the land to the west of the school changed to the lowest level hence no development is proposed in the Plan.'

Many local people remain surprised by this response from the Parish Council on two fronts:

1. Why would Herefordshire Council be building housing in Colwall? and
2. The justification and reasoning for the changes to the LSCA site capacity ratings that led to this U-turn.

When the LSCA was undertaken in 2013, it identified 'Land adjacent to the Village Hall, Mill Lane' in two parts, with site 9 (proposed for housing) having a capacity of Low to Medium to accommodate development and Site 9A (the new school) having a Medium to High capacity to accommodate development.

Given the high rating of Site 9A and its suitability for development this must have influenced the consideration of the capacity rating of site 9. It is difficult to understand how, following the development of site 9A for a school, the capacity rating of site 9, when reappraised, then fell two capacity bands from Low to Medium capacity to accommodate development to the bottom capacity rating of Low capacity. This change then resulted in the site being reassessed as having no potential for development, as detailed in the Parish Council response provided, and it being removed from the NDP.

1.6 – Robustness of the LSCA

Given the above, we have significant concerns over the reliability and robustness of the landscape evidence base, the LSCA, which has been through various iterations during the NDP process, resulting in fundamental changes to the capacity rating of a number of sites. It is not clear how and why such changes have taken place and that this evidence appears to have solely driven the choice of housing sites in the NDP.

In addition, there have been successful planning applications in Colwall village, which have been approved during the progression of the NDP, which are in locations which appear to be in conflict with the findings of the LSCA. These permitted developments conflict with the LSCA interpretations and decisions taken by the Parish Council with regards to the choice of sites in the NDP.

As detailed above, site 9 was reassessed in the 2018 LSCA and found to have a low capacity for development. As a result, the site was not considered to have potential for development in the NDP and was removed as a housing allocation in the Reg 14 version of the NDP by the Parish Council.

This position is in conflict with planning applications 170278 (Land next to / behind the Thai restaurant, Walwyn Road) and 184039 (Land at Brook House Cottage, Walwyn Road), which at the time of determination, also had the same rating as site 9, i.e. were identified as being in an area with the

lowest capacity for development, as determined by the LSCA. However, they were subsequently approved by Herefordshire Council as being suitable for development and both are now developed.

This position again reduces local confidence in the robustness of this landscape evidence to then be used to solely inform the choice of housing sites in the NDP.

Furthermore, there has been no opportunity for the local community to feed into the LSCA process, which is contrary to guidance provided by Natural England in 2014 (An Approach to Landscape Character Assessment October 2014 Christine Tudor, Natural England) on the preparation of Landscape Character Assessments. This states at page 48:

“At the more local scale local people can play a very important role in the characterisation process – communities of place. Not least, they will be able to discuss their views on the draft boundaries between different character types and / areas, and inform final boundaries. Also they can provide valuable input to the final naming of landscape types and areas – using names that reflect the locality and the local dialect for example.”

Link below.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/691184/landscape-character-assessment.pdf

The 2013 LSCA (para 1.1.4) and 2018 LSCA (Para 1.2.3) state that:

‘the community has a rare opportunity to determine where future development in the settlement should be located’.

This statement runs contrary to the Parish Council Reg 14 response to Representation 120 on page 302/389 which states that:

‘the village feedback is just that; it has not been endorsed by CPC’

and on page 308/389 which states that:

‘these statements were a selection of comments made by the public they were not made by or endorsed by the Parish Council’.

Given the exclusive and fundamental role that the LSCA has played in the identification of housing sites in the NDP, it seems inconsistent that the Parish Council response on page 295/389 of the Reg 14 response to representations document states that:

‘It is not the place of the LSCA to consider where development should or should not be placed, that is the preserve of the NDP Working Party’

Furthermore, and in addition to the LSCA work, a Visual Study Report (January 2019) has also been prepared as part of the NDP evidence base (link below). This document seeks to assess sites in terms of important views and visual amenity and has informed a new Policy CD1, which relates to the protection of exceptional views. This report has assessed both ‘Land adjacent to Mill Lane (Site 9)’ and ‘Land at Grovesend Farm’ as having the same sensitivity rating of High to Moderate. It is unclear how this then relates to the pre-existing LSCA work.

<http://www.colwallneighbourhoodplan.org.uk/Docs2/Colwall%20NDP%20Visual%20Study%20Jan19%20Final%20ALL%20for%20issue.pdf>

1.7 Need for wider NDP Site Assessments

At page 307 / 389 of the Reg 14 response to representations the Parish Council states that:

'The LSCA is the starting point; each plot is considered in accordance with their rating and if other matters are acceptable, included for development until the target is achieved.'

'Other areas may be preferable for other reasons but unless we demonstrate 'great weight' has been given to the landscape the plan will be rejected. The accepted method of demonstrating this is by a LSCA'

We recognise that the LSCA is an important element of site assessment work, particularly given the AONB context and that 'great weight' should be given to the consideration of the AONB. That said, 'great weight' does not infer landscape exclusivity to the detriment of not giving due consideration to other important site assessment factors including weight to be given to the protection of the Conservation Area / setting of listed buildings, to the capacity of the local highway network, to the connectivity of sites to the village's services and facilities, and to the views of the local community. All these factors should have been considered on a site by site basis early on in the NDP process and a weighted assessment undertaken to inform the selection of appropriate housing sites for inclusion in the NDP. Furthermore, the LSCA should have included community input in its preparation.

When it comes to considering two sites whose landscape assessments have varied, have typically been within one category of each other, and are in conflict with the SHLAA, this particular interpretation of guidance regarding 'great weight' to be given to conserving and enhancing the AONB that has been taken by Colwall Parish Council, against village views, does not appear to be an appropriate way to allocate land for development.

These points were acknowledged by the Parish Council in its Reg 14 response to representations table in the response to Representation 120 at page 295/389 where the Parish Council states that:

'the purpose of the LSCA is to indicate the level of capacity of an area in landscape terms to accept residential development: it does not consider factors relating to a developments feasibility, viability or desirability, nor matters such as density, layout, access servicing and such'

This is reiterated in the LSCA at paragraph 2.2.20 (2013), 2.2.28 (2018), which states:

*'It is important to note that the LSCA only indicates the level of the capacity of an area in landscape terms to accept high quality residential development. **It does not consider other factors which may need to be taken into account in order to facilitate development, such as access or servicing for example, and it does not make specific recommendations for factors such as the density of development, mitigation of potential adverse effects, style, materials, landscaping etc.**'* (Bold text is our emphasis)

These additional factors, including mitigation of potential adverse effects as detailed above in the LSCA, have not been considered as part of a wider Colwall NDP site assessment process to address suitability, availability, and deliverability of a range of site options in the village.

Instead, a form of site assessment was undertaken for only two sites that had already been selected through the revised LSCA as having potential for development given their capacity rating as having least impact on the landscape. These two sites were 'Land at Grovesend Farm' and the 'Old School Site', which then went forward for allocation in the Reg 14 NDP as proposed housing sites. The land off Mill Lane was not considered for any broader site assessment despite its previous status.

1.8 – Lack of Community Involvement in the NDP

Given the evidence in the previous sections, it is our view that there has been a fundamental lack of community involvement during the preparation of both Colwall's NDP and its landscape evidence. There have been various consultations undertaken, but little meaningful community involvement / engagement.

It has been made clear by Colwall Parish Council that this latest NDP is a landscape-led plan, and the allocation process has simply been to work down the list of sites by LSCA categorisation and to stop when the required number of houses to satisfy Colwall's housing requirement is met.

This process has given no opportunity for the NDP to be guided by the views of the villagers. These views were made clear in the 2015 consultation (as detailed in Section 1.4) and then, it appears, were largely discounted without proper justification for doing so.

The only real public consultation / choice of sites put to the local community was in 2015, when questions were asked relating to the choice of housing sites and sites for the new school. The land at Grovesend Farm was not included as being under consideration for housing at that stage and its proposed use as a school site had very little support and much objection.

Part 2 Regulation 16 NDP – Objection to the allocation of Grovesend Farm, Old Church Road as a housing site

The Regulation 16 NDP continues to identify 'Land at Grovesend Farm' as a proposed housing site suitable for around 37 houses. The NDP process has ignored the widespread community opposition to this site being developed that was made through the Regulation 14 consultation.

We wish to continue to register our strong objections to the identification of the 'Land at Grovesend Farm' as a housing site in the NDP on the following grounds:

2.1 – Highway and Access capacity limitations – Old Church Road

Access to the 'Land at Grovesend Farm' is poor, located far from the main village road (Walwyn Road), and requires traversing single-track sections whether via the parked-up stretch of Stone Drive and a poor-visibility junction, or down the narrow Old Church Road. The site has poor connectivity to and from the services and facilities of Colwall village.

In the 2011 and 2012 SHLAA, Grovesend Farm (ref HLAA/004/004) was classified as having no potential during the plan period and was excluded as a suitable site due to access / highway capacity constraints. Appendix 11 of the 2012 SHLAA notes:

"The local road network would not sustain intensification of use"

https://www.herefordshire.gov.uk/downloads/download/596/strategic_housing_land_availability_assessment_2012_planning_documents

Furthermore, when Grovesend Farm was considered for a potential school development in the 2015 Draft NDP it was stated that the site had:

'Highways & access limitations given existing infrastructure'

When this matter was raised through the Reg 14 consultation stage of the NDP, the repeated Parish Council response (e.g. p221 of 389) to representations from villagers was:

"The Highway Authority has confirmed (R Close email 16 June 2017 attached) it is content for the Grovesend development of 37 homes to go ahead "... subject to the provision of a safe and suitably surfaced (suitable for all seasons of the year) pedestrian link or links to the amenities and facilities of Colwall Village". The issue of pedestrian access will therefore have to be dealt with as part of the development of the site."

This response appears 79 times in the Regulation 14 response to representations table confirming that the site access / Highway Authority's position regarding the 'Land at Grovesend Farm' was a question frequently raised by the local community and obviously of widespread concern.

Requests have been made by members of Colwall's community to both the Parish Council and to Herefordshire Council requesting to see this email (which is understood to have come from a Planning Officer at Herefordshire Council) regarding the highways / traffic study, and the study itself (if one exists) that supports the response provided. To date this has not been shared.

The email extract appears to show agreement in principle, from Herefordshire Council's Highway Authority, to the development of Grovesend Farm, subject to the provision of a pedestrian link, which is in direct conflict with the conclusions of Herefordshire Council's own 2011 and 2012 SHLAA which assessed the site as not suitable for development due to 'the local road network would not sustain an intensification of use'.

Another important matter regarding the delivery of the 'Land at Grovesend Farm' as a housing site relates to the requirement, quoted above, of Herefordshire Highways Authority for the provision of a safe pedestrian access from the site to the village's services. In response to this, there are no suitable access options identified in the 2018 Reg 16 Draft NDP but the provision of a pedestrian link is a policy requirement - Policy CD4 Site 2 Grovesend Farm (Approximately 37 houses). The village / eastern

side of the site is bound by residential properties making it questionable that such a link can be realistically achieved which, in turn, makes the deliverability of the development unlikely.

The need for this off-road link is fully justified as it would partially address the poor connectivity of the site to the village and would ensure safe pedestrian / cycle access to services and facilities without reliance on the private car.

Regardless of whether pedestrian access can be adequately addressed, the following considerations apply to the increased private car traffic resulting from any housing development (a lack of suitable pedestrian / cycle access would further exacerbate the below):

- Old Church Road is a narrow (intermittently single-track) rural road located in the village's Conservation Area and is bordered by hedges and tree groupings protected by Tree Preservation Orders, making the provision of passing bays difficult to achieve;
- The junction of Old Church Road with Walwyn Road is complex and lies in very close proximity with Brockhill Road, which provides access to residential properties and The Downs School (which results in several significant vehicular and pedestrian traffic peaks during the day);
- Any traffic to the site coming from the South through the village would use Stone Drive to access Old Church Road via a difficult road junction with extremely restricted visibility. Stone Drive itself has a poor junction with the main road at Colwall Stone (Walwyn Road / Stone Drive), where parking is an ongoing issue. Stone Drive also provides access to the village medical surgery and pharmacy, resulting in sections where many parked cars narrow the road and impact on sight lines.

Given the above, the site is not considered to be compliant with Policy MT1 of the Core Strategy, which identifies principles covering movement and transportation that should be incorporated into development proposals including:

- *Development proposals need to demonstrate that the local highway network can absorb the traffic impacts of development without adversely affecting the safe and efficient flow of traffic on the network;*
- *Development proposals should promote and, where possible,.....including access to services by means other than private motorised transport and;*
- *Where traffic management measures are introduced, they should be designed in a way which respects the character of the surrounding area including landscape character.*

2.2 – Assessment of the Impact of Proposed Housing Development at Grovesend Farm on the Conservation Area for Colwall.

The Parish Council states, in its response to Regulation 14 representation 120, that the location of Grovesend Farm in the Conservation Area (Designated in 2001) has been assessed within the LSCA.

It is noted that the LSCA does mention this. However, there is no description / assessment of how the LSCA has evaluated the impact of the proposed housing allocation at Grovesend Farm on the character and appearance of the Conservation Area as per Paragraph 193 and Paragraph 201 of the National Planning Policy Framework (NPPF).

Policy LD4 of the Core Strategy states that development proposals affecting heritage assets and their settings should '*protect, conserve and where possible enhance heritage assets and their settings....*'. The development of land at Grovesend Farm for up to 37 houses would have a harmful impact on the character of the Conservation Area and the setting of Grade II listed buildings, which lie in the immediate vicinity of Grovesend Farm, and is therefore not an appropriate location for this scale of housing development. This is in contrast to land off Mill Lane, which has no such constraints.

This impact of development on the Conservation Area was recognised by the Parish Council when they were asked for their views on a recent planning application (ref 193186) for one dwelling on a

site at Checketts, Old Church Road, which lies in close proximity to the Land at Grovesend Farm. In response to the planning application the Parish Council stated (on 25/10/2019, see Appendix A) that:

'IT WAS RESOLVED that Colwall Parish Council strongly objects to this application as it contravenes LD1 of the Herefordshire Council Core Strategy. The proposed would not conserve and enhance the natural, historic and scenic beauty of the important landscape and features of the Malvern Hills AONB or the Conservation Area of Colwall. The properties in Old Church Road, Colwall are characterised by large properties that sit within large plots with distinctive large trees, and the proposed would fundamentally alter the character of Checketts and the plot in which it sits.'

This Parish Council response, to strongly object to the development of a single dwelling off Old Church Road, is in direct conflict with the Parish Council's decision to then progress an NDP which allocates a large development of around 37 houses at Grovesend Farm on the same road in the same Conservation Area. There is no consistency of decision-making being applied. If the impact of one dwelling is considered unacceptable then the same conclusion must be reached for a significantly larger development in the same part of the village which, by virtue of its scale, would have even greater impacts on both the AONB and the Conservation Area.

The Colwall Conservation Area appraisal describes the areas around Old Church Road and Walwyn Road as having largely retained their historic character and architectural interest and high environmental quality within the village.

The link below illustrates the extent of the Colwall Conservation Area and its boundary, and is also shown in Figure 2.2.1. This highlights the open space of Grovesend Farm and the rural character of Old Church Road.

https://www.herefordshire.gov.uk/download/downloads/id/1369/colwall_stone_upper_colwall_conservation_area.pdf

Open spaces are highlighted as important features in the Conservation Area appraisal, as follows after Figure 2.2.1.

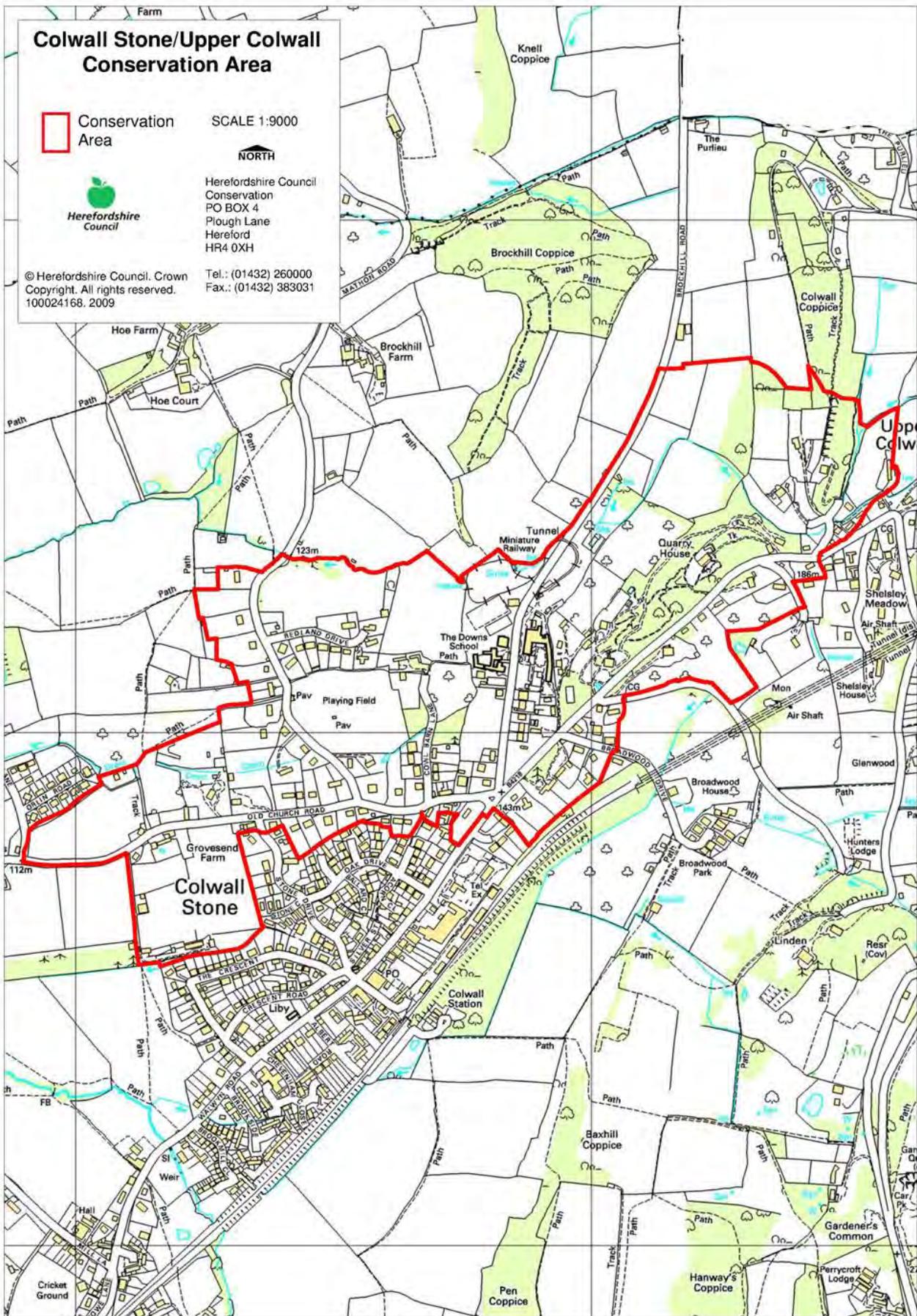


Figure 2.2.1 – Boundary of the Colwall Conservation Area, with Grovesend Field at the southern extent

The appraisal, in drawing number CA/COL/1 (Figure 2.2.2 below), identifies two important views across Grovesend Farm. In addition, the 2019 Visual Study Report, which was prepared as part of the evidence base in support of the Regulation 16 draft of the NDP, identified a number of important views across the land. Furthermore Fig 2.2.2 identifies the Tree Preservation Orders (TPOs) along Old Church Road and the listed buildings adjoining the site at Grovesend Farm.

Given the heritage sensitivities of the land at Grovesend Farm, it is not clear what assessment has been undertaken, if any, through the NDP process to identify the impact of 37 houses on a valuable open space within the Conservation Area or on the setting of adjacent Listed Buildings as required by the NPPF. This raises two specific questions:

- What is the level of harm caused to the Conservation Area?
- Can it be outweighed by public benefit?

Please see Herefordshire Council's Historic Building Officer's Reg 14 response (Page 12 of 389) below which also raises this point:

'The site south of Grovesend Farm is a very interesting example of a model farm with tramway. The farm was based on the production line principle and built by the Ballard family. Waste malt from the vinegar works was conveyed by tramway to the piggery where it was used to feed pigs, the waste from the pigs used on surrounding soil.

The site is in a Conservation Area and as such Policy 138 and 134 of the NPPF would apply to development on the site of the model farm. Whilst there is a low level of surviving fabric, we would recommend a listing application for the avoidance of doubt. If the tests of policy 134 are met, allowing development, then 141 of the NPPF would apply for any development, this would require a recording of any structures to be demolished.'

(Please note that the response uses paragraph references from the 2012 NPPF which has been updated. The latest NPPF is dated February 2019. Para 134 is now para 196, para 138 is now para 201 and para 141 is now para 199).

Furthermore, and with respect to the Parish Council's recent response to planning application ref (ref 193186) for one dwelling on a site at Checketts, Old Church Road, how would any development of Grovesend Farm accord with:

- Aim 5 of the Reg 16 NDP, which seeks to preserve and enhance the character of the Conservation Area and protect its setting?
- Policy CD2 of the Colwall NDP, which states that proposals for new development will be required to demonstrate careful consideration of impact on the Conservation Area?

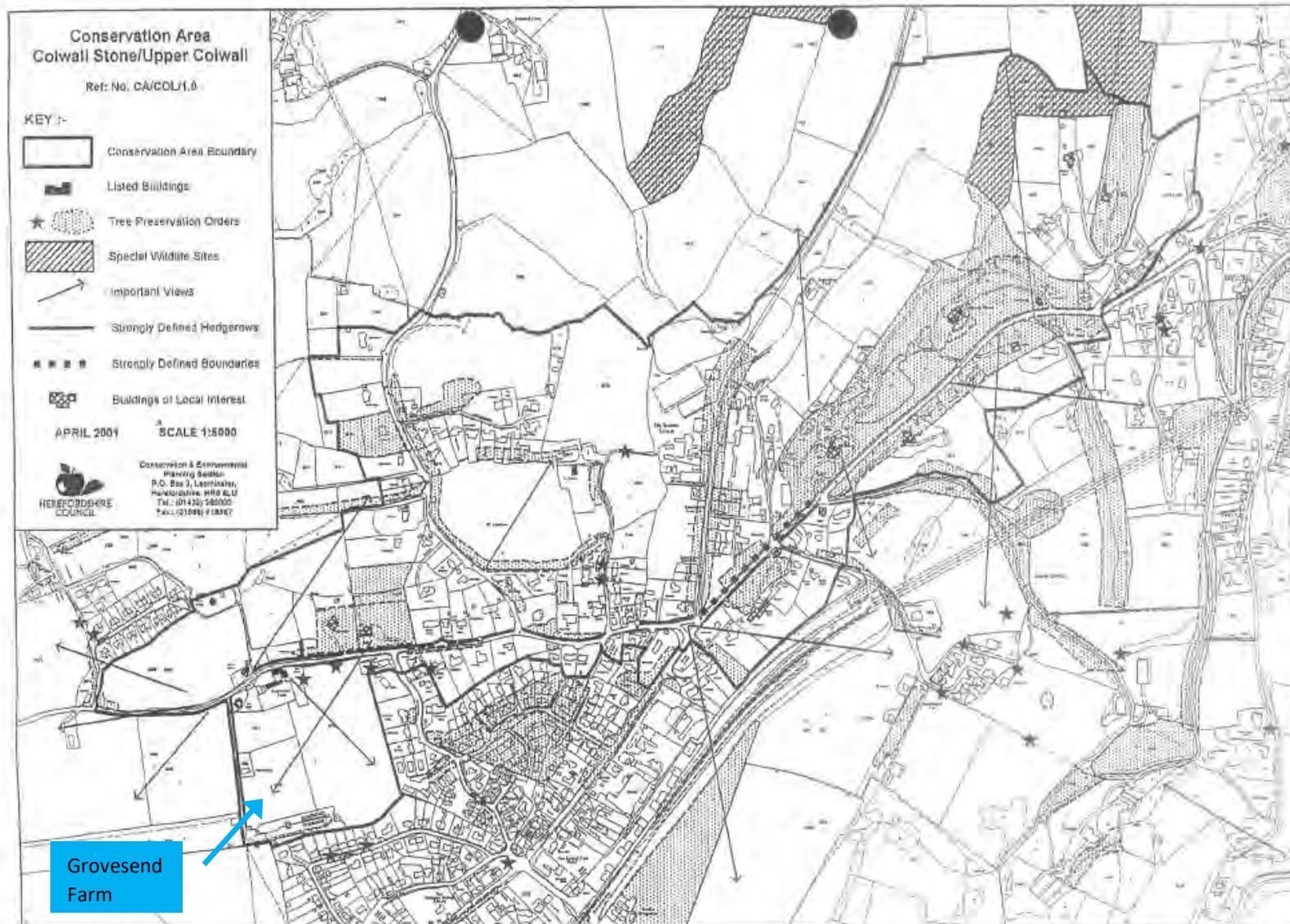


Figure 2.2.2 – Drawing number CA/COL/1 from the 2001 Designation document for the Colwall Conservation Area, showing important views over Grovesend Farm, within the Conservation Area boundary

2.3 – Deliverability of the proposed Grovesend Farm site

The land at Grovesend Farm is identified as a proposed housing allocation for up to 37 houses in Policy CD4 of the Reg 16 submission draft of the Colwall NDP (pages 49 to 51). This is despite the Capacity Table (Table 1) provided at p 24/93 of the Reg 16 Draft NDP stating that the site could only accommodate 32 dwellings.

Noting the location of the site in the Conservation Area, adjacent to listed buildings, the 'L shaped' allocated site, the important views across the site that have been detailed in the 2019 Visual Study Report, and the documented highway constraints, it is suggested that the density / capacity of the site to deliver the required number of houses is likely to be an issue.

<http://www.colwallneighbourhoodplan.org.uk/Reg15Submission/Colwall%20NDP%20Reg%2015%20Submission%20Low%20res.pdf>

In addition, one representation in the Reg 14 response table (p240 of 389) noted:

“The owner of Grovesend Field and Colwall Parish Council should both be aware of the existence of an active restrictive covenant that extends into Grovesend Field.”

The Parish Council response to this was:

“Restrictive covenants are not a planning matter”

We do not believe this response adequately addresses a matter that may adversely impact on the deliverability of the proposed site.

The above matters, along with the issue of the requirement for a pedestrian access described above, result in significant concerns as to whether use of the land at Grovesend Farm as housing site is in fact deliverable.

2.4 – Suitability of Land adjacent to School / Village Hall Mill Lane for Housing (LSCA Site 9)

This representation recognises the need to deliver housing in Colwall and promotes Site 9, as identified in the LSCA, which lies adjacent to the new Primary School and the Village Hall as representing the most sustainable housing site available in Colwall. We believe it should therefore be allocated as such in the NDP as a replacement for the land at Grovesend Farm.

Taking account of the above matters, and carrying out a wider site assessment of both the housing potential of Site 9, which lies adjacent to the School and Village Hall, Mill Lane, and the currently allocated Draft NDP housing site on land at Grovesend Farm, it is considered that Site 9 forms a significantly more sustainable location for necessary housing development in terms of highway capacity, heritage matters, connectivity to services by foot (reducing reliance on the private car), and strong community support as demonstrated in 2015.

Despite our reservations over the robustness of the LSCA, it does conclude that the site has a lesser capacity with respect to landscape matters than the land at Grovesend Farm. That said, there has, as yet, been no consideration given to whether this position could be offset through landscape mitigation proposals and giving weight to all the other benefits of allocating Site 9 as the identified housing allocation in the Colwall NDP as demonstrated in Table 1 below. In addition, as detailed in this representation, there have been sites which were identified as having low capacity for development in the LSCA which have subsequently been approved by Herefordshire Council through the granting of planning permission as being suitable for housing development

Table 1: Site Assessment for Land adjacent to the Village Hall, Mill Lane and Land at Grovesend Farm

	Adjacent to the Village Hall Mill Lane (Site 9)	Grovesend Farm (Site 12A)
LSCA 2013	Low to Medium	Not assessed in 2013 LSCA as considered unsuitable for housing (Figure 1.2.1). Subsequently assessed in Revision A (Nov 2014) as Medium / Low to Medium
LSCA 2018	Low Capacity	Site 12A Medium/Low-Medium Capacity
Highway capacity	Good	Poor – Also requires provision of a pedestrian link which is currently viewed as non-deliverable
Conservation Area	Outside	Inside
Proximity to listed building	None	3 located in close proximity to site
Proximity/Connectivity to community facilities	Village hall and school adjacent to the site. Good connectivity to village facilities. Safe and short walking route to village services and train station.	Poor connectivity with village services. Pedestrian use of Old Church Road is not considered safe as narrow with poor visibility and no pavement. Reliant on use of car to access village services and train station.
Community response for use as a school 2015	82 support, 8 object, 2 don't know (including housing as part of development.	6 support, 56 object, 9 don't know.
Community response for use as housing 2015	65 support, 7 object, 13 don't know	The first time this was consulted on was at Reg 14 (2018). No draft consultation or input from parishioners.

Additional explanatory comments.

The community response above relates to the selection of the school site, although for the school option adjacent to the Village Hall, Mill Lane it was proposed as:

- "The site adjacent to the village hall is allocated for a mixed use development including a new school, community / recreational facilities and housing."

The land at Grovesend Farm was only considered as a school site with strong views expressed as shown above. Grovesend Farm was not proposed for housing development in 2015, so no question was asked on that specifically.

Conclusion

It has been detailed in this representation that the 2018 Reg 14 NDP consultation process attracted a large number of objections and concerns related to the identification of the land at Grovesend Farm as a proposed housing site. Despite this, the land at Grovesend Farm continues to be identified as a housing site in the Reg 16 NDP and, as such, these concerns remain unanswered.

Furthermore, this representation has detailed that the NDP, as currently drafted is not in accordance with the Core Strategy requirements related to Policy RA2, which seeks deliverable and sustainable schemes which are appropriate to their context and make a positive contribution to the surrounding environment as well as Policies MT1 and LD4.

Given this, and the poor connectivity of the land at Grovesend Farm with Colwall village, this NDP does not promote sustainable development and does not therefore meet the required Basic Conditions. This failure to comply provides Herefordshire Council / the NDP Examiner with sound justification to return the draft NDP to the Parish Council for review and for the undertaking of true community involvement / engagement on both the NDP evidence and progression of the identification of housing sites in Colwall's NDP.

On the basis of a wider site assessment, it is considered that, on balance and taking account of the community response, the site adjacent to the new Primary School and Village Hall, Mill Lane (LSCA site 9) represents a far more sustainable option than land at Grovesend Farm and should be allocated to meet the housing requirements of the Parish as an alternative to Grovesend Farm which, as documented in this representation, has justified concerns over its suitability, availability and deliverability to meet the housing needs of Colwall Village.

Appendix A – Planning response

This recent planning application objection from Colwall Parish Council gives weight to the Colwall Conservation Area and the character of Old Church Road. See section 2.2 for commentary on this.

https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=193186&search=193186

-----Original Message-----

From: Parish Clerk <colwallpcclerk@gmail.com>

Sent: 24 October 2019 10:27

To: Bailey, Josh <Joshua.Bailey@herefordshire.gov.uk>

Subject: {Spam?} Re- 193186 – Proposed erection of 1 no. residential dwelling at Checketts, Old Church Road, Colwall, Malvern, Herefordshire. Applicant:Ashton

Morning Josh

Please find below the Parish Councils comments to this application.:-

i) Re- 193186 – Proposed erection of 1 no. residential dwelling at Checketts, Old Church Road, Colwall, Malvern, Herefordshire.

Applicant: Ashton

IT WAS RESOLVED that Colwall Parish Council strongly objects to this application as it contravenes LD1 of the Herefordshire Council Core Strategy.

The proposed would not conserve and enhance the natural, historic and scenic beauty of the important landscape and features of the Malvern Hills AONB or the Conservation Area of Colwall.

The properties in Old Church Road, Colwall are characterised by large properties that sit within large plots with distinctive large trees, and the proposed would fundamentally alter the character of Checketts and the plot in which it sits.

Regards

Karen

Karen Davis

Clerk to Colwall Parish Council

APPENDIX B - Regulation 14 Response

The following was submitted in 2018 as part of the Regulation 14 Consultation, and is included for information.

While some aspects are no longer relevant (e.g. the Bottling Plant is now allocated for housing), much of the information it contains is relevant and it was hoped would have led to changes before the Reg 15 submission.

Mrs Karen Davis
Clerk to Colwall Parish
Humble Bee Hall
Hollybush
Ledbury
HR8 1ET

18th March 2018

RE: Colwall Neighbourhood Development Plan 2018

Dear Mrs Davis,

We are a group of Colwall Parishioners who attended the public meeting on 31 January 2018 at which the latest version of the draft Colwall Neighbourhood Plan (“NDP”) was presented. We wish to express our deep reservations and objections to some of the proposals therein. As well as commenting as individuals we have collaborated to produce a document (attached to this letter) which encapsulates and expresses our collective concerns.

In addition to commenting as individuals we have reviewed the progress of the NDP and its associated work, the Landscape Sensitivity and Capacity Assessment (“LSCA”), through a number of studies over the years and we have noted that an underlying objective has been to produce a document which encapsulates the wishes of those living in the Parish and yet meets the requirements placed upon the Parish by local and national government. This is not an easy task; by definition, attempting to marry two often widely divergent objectives.

We accept that Colwall has wider responsibilities than simple parochial matters but we believe that for a number of reasons, which we will explore later, the wishes of a substantial number of Parishioners are not being given the weight they deserve. Certain previous consultations and surveys of parishioners’ views appear to have been over-ruled in the current document.

The latest version of the NDP contains a number of new proposals not previously seen meaning the current NDP differs markedly in certain aspects from previous versions. These include, certain proposed changes to the settlement boundary, the exclusion of proposed housing development at certain sites which were previously considered possible and the consequent inclusion of proposed housing development on Grovesend Field.

These changes are the result of a number of factors (some external) which have than been supported in part by changes and amendments to the LSCA commissioned by Colwall Parish Council (“CPC”). By its very nature the LSCA is a subjective study as there are no hard parameters to determine or assess. We are concerned that changes that have been introduced to the LSCA over time have been consistently supportive of the changes introduced in subsequent versions of the NDP.

We acknowledge that:

- There is a national shortage of housing stock
- Herefordshire County Council has responsibilities to fulfil
- Colwall Parish Council has responsibility to fulfil Herefordshire’s housing quota demands

We stress that we do not oppose the production of the NDP. An approved NDP will strengthen the control of CPC over planning matters whereas the absence of a NDP will effectively give an unacceptable level of control to others, stifling the collective voice of the Parish.

Our desire is to have the current NDP modified to take into account genuine concerns and to assist Colwall Parish Council to achieve an NDP that suits the needs of the Parishioners, and protects landscape sensitivities consistent with the fact that we live in an Area of Outstanding Natural Beauty which includes the Colwall Conservation Area (CCA).

APPENDIX B – 2018 Regulation 14 Representation

This document is in two parts:

- A. This covering letter, which introduces and summarises our principal concerns.
- B. A number of Appendices¹ which present the background to our studies, detail our objections, analyse the arguments for and against and summarise the conclusions we have drawn.

Only the summaries and conclusions for each appendix are brought forward to this letter.

The Appendices allow the reader a fuller and in depth analysis of our concerns.

The Appendices cover:

- 1 The Landscape Sensitivity and Capacity Assessment, Stages 1 and 2
 - 1.1 Background to the LSCA
 - 1.2 Frequent inconsistencies and variations between LSCA Stages 1 and 2
 - 1.3 External influences on the choice of the Colwall Settlement Boundary
 - 1.4 Specific inconsistencies between Stages 1 and 2 on site-by-site basis
 - 1.5 Access and Services
 - 1.6 Feed-back from Parishioners
 - 1.7 Summary and Conclusions for Appendix 1
- 2 Housing Development in the AONB and Colwall Conservation Area
 - 2.1 Background
 - 2.2 Appropriate Legislation
 - 2.3 Conservation Area Application 2001 and inconsistency with LSCA assessment
 - 2.4 Summary and Conclusions for Appendix 2
- 3 Road and Infrastructure Issues
 - 3.1 Background
 - 3.2 Access to Grovesend Field
 - 3.3 Access to other proposed sites
 - 3.4 Summary and Conclusions for Appendix 3
- 4 Other Environmental and Historical Concerns
 - 4.1 Archaeology
 - 4.2 Other Advisors
 - 4.3 Other Environmental Aspects
 - 4.4 Summary and Conclusions for Appendix 4
- 5 The Way Forward

These points are discussed in detail in the Appendices to this letter. A summary of our overall conclusions is given below.

1. The Landscape Sensitivity and Capacity Assessment, Stages 1 and 2

There is ample evidence to support the view that the aims and objectives that led CPC and the Malvern Hills AONB to commission the LSCA have been compromised.

Amendments introduced between the 2013 and 2018 studies, which have been carried forward into the 2018 NDP, have been driven by external factors which have:

- eliminated previously acceptable sites for development;
- made it impossible for the writers of the NDP to reflect the needs and views of the village as expressed in the 2013 consultation and the Village Design Statement 2001 (one of the main objectives of the NDP);

¹ All directly quoted text in the Appendices is in italics, usually with a reference to source.

APPENDIX B – 2018 Regulation 14 Representation

- compromised the integrity of the LSCA where capacity assessments in a number of areas have changed, despite no outward change in the landscape being assessed;
- forced the inclusion of significant development on Grovesend Field, despite much evidence that the site is unsuitable for the reasons listed.

Consequently, we are surprised and deeply concerned that the Colwall NDP is proceeding with a strategy that is dependent on the development of Grovesend Field while a more acceptable alternative (in the form of The Bottling Plant) may become apparent in the short-term (as the Plan runs to 2030).

The above is a major element of our challenge of the NDP as currently written and we consider that further work, as suggested in the detailed appendices, should be undertaken to ensure sites more suitable for the village are investigated thoroughly and re-instituted in the NDP.

2. Housing Development in the AONB and Colwall Conservation Area

Grovesend Field, and its surroundings, lie within the area of the Malvern Hills AONB, have specific and significant mention in the CCA and are adjacent to three listed buildings on Old Church Road, which forms the northern boundary of the field. It has been described as a “Green Lung” for the village and is clearly visible from the ridge of The Malvern Hills. Any development would severely diminish the striking views from the Wyche Cutting to Black Hill.

The AONB, the CCA and the three listed buildings are the result of three separate and independent assessments, concluding that there are areas and structures in and around Colwall that are sufficiently valuable to the community (both local and at large) that they should be afforded protection and conserved for future generations.

The allocation of land for construction of a housing estate of 37 modern houses in, on, and adjacent to these assets is a direct contravention of the ethos of these conservation and protection orders and should not be permitted.

3. Road and Infrastructure Issues

Colwall Stone area is the most densely populated area of the village and traffic congestion is already a problem. The 2013 village responses were clearly against the current proposals. An additional large development of 37 houses on Grovesend Field will simply exacerbate an already difficult situation as it would create substantial extra vehicular and pedestrian traffic on sub-standard roads and pose real dangers to both.

We consider that other sites are available that provide far easier access and far less disruption and danger to the residents, and these should be reinstated in the 2018 NDP

4. Other Environmental and Historical Concerns

The LSCA has not taken due note of the archaeological and historic remains in Grovesend Field (it acknowledges there are many factors it does not take into consideration). As a result, using the LSCA as the major influence on selection of deliverable sites, without full reference to other factors, has led to unsuitable sites being included and less sensitive sites being ignored.

5. The Way Forward

Colwall has been allocated a target for housing development using a County-wide simplistic, pro-rata yardstick, which makes no allowance for the more stringent planning criteria contingent on its location within the Malvern Hills AONB (See Section 2 for NPPF requirements).

HCC adopting such an approach seems to display a lack of imagination and foresight and it is no surprise that completion of the Colwall NDP has proved to be a very onerous task.

Located in an AONB, selection criteria for Colwall (and other communities in a similar situation) are more stringent. Therefore the Parish will find it more difficult to make it over the bar than non-AONB communities.

The Colwall NDP has taken several years to get to its current stage; a few more months should make little difference and will allow more time for re-evaluating the possibility of using a range of more suitable sites, including the brownfield site on the Old Bottling Plant (broadly seen as the best option for the balanced development of Colwall in the future).

To proceed with an NDP which includes Grovesend Field as a possible site for housing development risks its inclusion in similar studies in the future

It is our opinion (as Parishioners committed to Colwall) that every effort should be taken now to avoid the loss of an irreplaceable conservation area open space vital to the village.

Overall Conclusions

We believe that the CPC plans are being thwarted by HCC and so we determined, where possible, to support CPC in following the settlement boundary of the 2015 Draft NDP.

We believe, in particular, more attention should be paid to the brownfield site of the Bottling Plant and land adjacent to the New School.

We understand that Herefordshire Council has also resisted attempts made by the CPC to argue that, as an AONB, Colwall should not be required to provide the same percentage of new housing as the rest of the County (in order to protect such status). In addition, HCC will not consider “transfer” of any surplus housing quota (i.e. application of the quota over a sensibly extended area), despite Ledbury having already exceeded its 2030 housing target.

We propose that the objectives of the NDP should not be set to meet the arbitrary target for housing set by HCC and HCC’s position should be further challenged. CPC must ensure that a strong case has been made to HCC to help avoid unneeded development in the AONB.

The 2018 NDP, by the CPC’s admission, only looks at areas within the main village, and does not take account of other possibilities through development of Upper Colwall or the “hamlets” as mentioned above in 1.6. Pressure of time created by the triggering of Regulation 14 seems to have compounded the problem for our Parish Council.

We believe that our approach, supported by the evidence presented in the Appendices to this document, would make it possible to create a modified NDP which:

- Meets housing requirements
- Aligns with villagers’ views from previous consultations
- Better protects the village
- Will receive greater support and avoid significant opposition

Given that alternate sites are available for development to fulfil Colwall’s housing quota, we maintain that the approach presented in the 2018 Draft NDP is not justified or sustainable.

Signatories to this Letter

Names	Addresses
Mrs A Richardson	
Mr B Richardson	
Mr R King	
Mrs P King	
Mr R Beard	
Mrs K Beard	
Mrs N Beard	
Mr G Beard	
Mrs S Brain	
Mr R Brain	
Ms J Cooke	
Mr P Bridges	
Mrs V Bridges	
Mr C Stephens	
Mrs A Stephens	

List of Abbreviations

AONB	Area of Outstanding Natural Beauty
CCA	Colwall Conservation Area
CIL	Community Infrastructure Levy
CPC	Colwall Parish Council
HCC	Herefordshire County Council
LPA	Local Planning Authority
NDP	Neighbourhood Development Plan
NPPF	National Planning Policy Framework
UDP	Unitary Development Plan

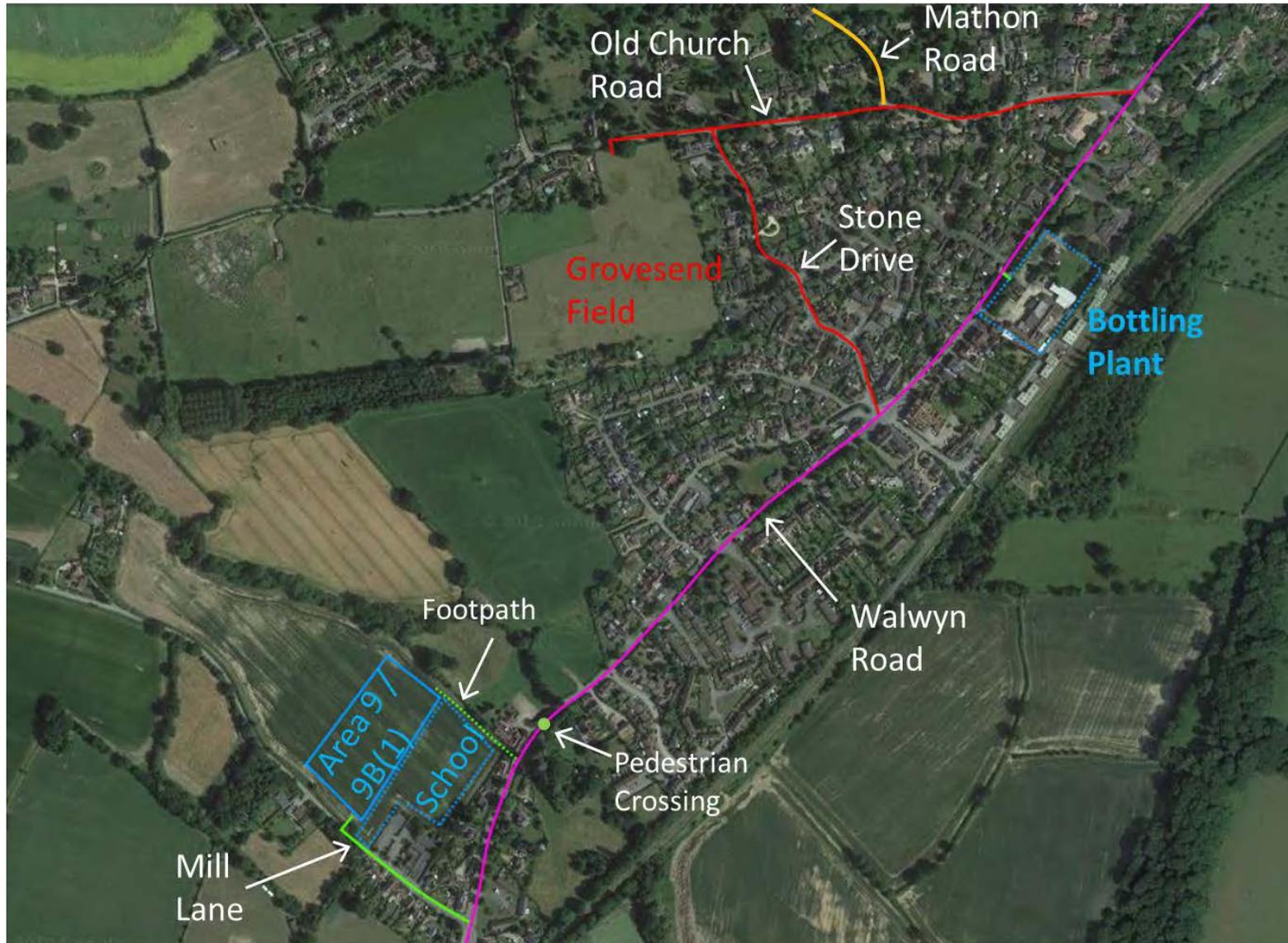


Figure 1: Satellite view of Colwall with significant features and main areas of interest highlighted. This clearly shows the linear nature of village development to date.

APPENDIX 1: The Landscape Sensitivity and Capacity Assessment, Stages 1 and 2

1.1 Background to the LSCA

Both the Stage 1 (2015) and Stage 2 (2018) drafts of the NDP have relied heavily on the two-stage LSCA Report commissioned by the Malvern Hills AONB Partnership and Colwall Parish Council in 2013 to provide a grading and assessment of the relative importance of a number of potential sites for housing development around Colwall. Stage 1 was completed in 2013 and formed the basis of the NDP draft presented to Parishioners in 2015; Stage 2, an amendment to the above, was used in the 2018 NDP draft.

Paragraph 1.1.4 of the 2013 LSCA (on the Assessment of Settlement Boundary) stated:

*“Herefordshire Council’s forthcoming Local Development Framework (LDF) or Local Plan will **not contain settlement boundaries**. Consequently Colwall Parish Council is minded to include a Settlement Boundary for Colwall within their Neighbourhood Development Plan, which is currently being prepared.*

On page 19, para 6.1.4 of the 2015 draft of the NDP states:

*The former settlement boundary for Colwall was identified in the Herefordshire Adopted Unitary Development Plan (UDP) Proposals Inset Map 10. This has not been taken forward into the Core Strategy and **no settlement boundary will exist unless one is provided by the NDP**, or through the proposed Herefordshire Rural Area Site Allocation Development Plan Document to be prepared by Herefordshire Council. As a settlement boundary is considered key to achieving the protection of landscape character and visual amenity it is essential to establish a settlement boundary in the NDP as a statutory planning policy.*

Part of the brief for the LSCA (paragraph 1.1.4) stated:

“The community, therefore, has a rare opportunity to determine where future development in the settlement should be located. In order to assist the community in its deliberations and decision making the Malvern Hills AONB Unit wishes to commission advice from a Landscape Architect.”

These are clear and concise statements which demonstrate the benefits the LSCA and the NDP can bring to Colwall – the key words in the above being “...assist the community in its deliberations and decision-making...”

We believe that the aspirations set out above have been compromised by a number of factors, as discussed below.

1.2 Frequent inconsistencies and variations between LSCA Stages 1 and 2

The LSCA is, by definition, a subjective assessment by the assessor. There are no hard and fast rules by which one can produce a precise assessment. Consequently, the relative grading of different sites with respect to each other is also subjective.

As the LSCA is the opinion of an individual, a different professional assessment could produce a different result.

It is of concern that there has been a regrading of site criteria in the two LSCA reports between 2013 and 2018, which in turn have supported major changes in emphasis between the 2015 NDP and the 2018 NDP.

In this context we have studied the March 2017 review of LSCA Areas issued by C Tinkler and take issue with many of the statements therein. The landscape has not changed; the assessments by the same assessor should be the same.

1.3 External influences on the choice of the Colwall Settlement Boundary

Despite the points raised above in Section 1.1 on the need for the Colwall Community to decide on the Settlement Boundary, there is clear evidence that HCC has ignored its own policies and imposed its own view of where the settlement boundary should be. This has resulted in the elimination from the 2018 NDP of an area capable of supporting 21 houses (2015 Parish presentation) when the potential development of these is acceptable to both the CPC and the landowner.

Area 3 in the 2015 NDP is now known as Area 9 in the 2018 NDP.

Colwall Parish Council “CPC” wanted the Area 3 (2015 NDP), adjacent to the village hall and Mill Lane, to be allocated for a mixed use development - a new school, community / recreational facilities and housing. The landowner was approached and approved the proposal.



Figure 2: Area 9 / 3 adjacent to the Village Hall and the new Colwall Primary School

At a meeting of the CPC on Wednesday 30th November 2016 it was recorded that the planning permission eventually granted by HCC for the school development was **not** for a mixed development, as HCC had initially requested and as was the basis of the consultation, but that it had changed to a single-use development (school only).

Furthermore, HCC had required that the proposed landscaping for the school should provide an edge to the village settlement, thus eliminating potential housing development to the west.

The minutes specifically mention that **CPC was not consulted on this change of approach by HCC.**

As a consequence of HCC's unilateral decision to impose a settlement boundary, the author of the LSCA was asked re-assess the capacity of the Mill Lane site to accept development. It was reduced to 'Low', the NDP was amended and CPC were faced with having to find additional sites as a consequence of the loss of 21 houses from the NDP.

It is instructive to review the differences in the LSCA assessments on the Mill Lane site in Stage I and Stage II of the LSCA – see Section 1.4 below.

The question must be asked, would it have been necessary to reassess and regrade the site, and in doing so raise questions about the robustness of the LSCA on which much emphasis is placed if HCC had not insisted on a hard boundary at the edge of the school site?

1.4 Specific Inconsistencies between Stages 1 and 2 of the LSCA on a site-by-site basis

It is our belief that a number of potential sites for housing development, reflecting the views of Parishioners and more closely aligned to the original objective and direction of the LSCA, have not been properly considered in the Stage 2 LSCA and thus the 2018 NDP.

These are listed below, and should offer sufficient capacity to meet the NDP needs.

1.4.1: Area 9 - by the Village Hall and the New Colwall Primary School.

As described above, Area 9 was included in the 2015 NDP but it has been dropped from the 2018 LSCA and the overall capacity downgraded by 2 steps from “low to medium”, to “low” although the actual 2013 and 2018 assessment sheets have changed very little.

Paragraph 4.22 of the 2018 NDP states:

“Following significant consultation with the parish council Herefordshire Council approved the planning application for the new school on 3 August 2016, sited adjacent to the village hall in the development plot referenced 9a.

The landscaping for the school was highly developed and as a consequence it was necessary to reassess nearby areas under the LSCA. This lowered Plot 9 by 2 steps from the previously recorded ‘Low to Medium’ to ‘Low’. Conversely it raised part of the area around the Thai restaurant from ‘Low to Medium/Low’ to ‘Medium to High’. These changes have now been taken into account together with a review of the numbers of dwellings each site can accommodate. The principle of determining the development sites remains that of starting with the sites with most capacity in landscape terms and proceeding until either the target is achieved or the capacity falls below ‘Medium’ as below this it is not considered appropriate for development in the Area of Outstanding Natural Beauty.”

The phrase “*The landscaping for the school was highly developed...*” is a gross exaggeration. The landscaping for the school comprises the planting of a new hedge. There is no hard boundary apart from HCC Planning Section’s bald statement that it is a “hard boundary”.

The changes to the LSCA are:

- A line has been added under landscape value linking area 9 to areas 11 and 8 to “justify” reclassification. We consider this to be very tenuous;
- A subtle change in words in “Overall Sensitivity” is from “*forms clear start of open countryside*” (2013) to “*forms integral part of good quality rural open countryside*” (2018), but with no substantive changes in fact to support such a statement;
- It is remiss that an architect has not been employed for this site to see how some housing could be blended in to soften the approach to the village and put the school in context as a village school.

We do not believe that these changes are justified, nor that they support an increase in sensitivity of the area from “High, Moderate” to “High” thereby reducing the Landscape Capacity by two steps from “Low to Medium” to “Low”.

Despite HCC’s apparently “hard line” settlement boundary on the school boundary this is an area the Village considered acceptable for development. The landowner is still very committed to housing on this area having initially **offered the school site as part of a mixed development**.

The LSCA revision should have included Area 9 in the latest NDP despite HCC opposing it. The mixed housing/school was promoted during the 2015 presentation and widely supported by the Parishioners and The Parish Council).

Additional points on Area 9:

- During the construction of the school a new hedge was planted across Area 9 cutting the field into two sections, which could be considered 9B(1), close to the school, and 9B(2), farther from the school. The 2015 NDP proposed 16 houses in Area 9 (corrected to 21 in the NDP Presentation), which would not require all of section 9B(1) (let alone the full Area 9) and, landscaped appropriately, would allow the area to contribute to the number of houses needed to meet Hereford’s requirements;
- In a similar vein to how area 9A was considered “Medium to High” for Capacity, **9B(1) and 9B(2) should be revisited and options for landscaping new housing tested**. This approach has been adopted in splitting Area 12, and it appears inconsistent not to do so for area 9.

The Stage 2 re-assessment of “Low” appears to be a retrospective adjustment to justify the removal of Area 9 from the NDP as a site with potential for housing development.

1.4.2: Area 12A (formerly major part of Area 12).

The Area 12 LSCA “overall sensitivity” has been changed from HIGH MODERATE (2013) to MODERATE (2018) despite the wording on the assessment sheet remaining exactly the same. This reinforces our view, expressed in 1.2 above, that the LSCA amendments have been driven by a need to justify inclusion of this site which lies within the only conservation area in Colwall, and has totally inadequate access for a large development of housing.

If such a change can be allowed on such a sensitive site it opens the opportunity to challenge re-visiting all other areas.

Table 1 shows the amendments introduced for Grovesend Field.

	Stage 1 LSCA (2013) Area 12	Stage 2 LSCA (2018) Area 12 A
Landscape Value	“However built development likely to have adverse effects on landscape character / visual amenity - area is not recommended for consideration . Landscape quality & condition could be improved in future.”	“ Residential development potentially acceptable on this Area , but density, siting, layout and design of built form must respect and reflect the existing local settlement pattern, vernacular and sense of place.”
Landscape Sensitivity	“Relatively low quality and condition with eroded and broken edges but highly sensitive in terms of local landscape character and existing edge of settlement. Close association with historic sector of village to north ”	“Currently relatively low quality and condition with eroded and broken edges. Whole field highly sensitive in terms of local landscape character but E side of field less so. Close association with highly sensitive historic sector of village to N. ”

Table 1: Areas 12 and 12A (Grovesend Field) as presented in the Stages 1 and 2 of the LSCA

APPENDIX B – 2018 Regulation 14 Representation

There has been a significant change in the assessment of Grovesend Field from 2013 to 2018 in the LSCA in an attempt to justify its characterisation as land potentially suitable for development. This is not accepted.

There has been no change of character, use of the land, no additional development in the area surrounding the field or change in any other measurable characteristic. Given the above, it is inconceivable that “built development likely to have adverse effects on landscape character / visual amenity - area is not recommended for consideration” can become “Residential development potentially acceptable on this Area”.

We would suggest that the phrase “density, siting, layout and design of built form must respect and reflect the existing local settlement pattern, vernacular and sense of place.” is simply an attempt to camouflage a change of status imposed by apparent problems with sites previously recommended for development.

The 2013 Village feedback noted that no major development should be allowed in Old Church Road, no doubt for the reasons noted above. The inclusion of area 12A also goes directly against the statement in 4.22 of the 2018 NDP, “or the capacity falls below medium as below this it is not considered appropriate for development in the Area of Outstanding Natural Beauty”, thereby showing that this site is unsuitable for inclusion.

In the 2015 draft of the LSCA and the NDP, Grovesend Field (Area 12A in the 2018 Colwall NDP) was discounted as a site suitable for development.

The inclusion of Grovesend Field as a site for the development of 37 houses is due to a large extent by HCC unilateral imposition of a settlement boundary on the Mill lane site in Colwall.

1.4.3: Areas 7 & 7A SW of Colwall Green.

The LSCA makes little sense in so far as a key element of these sites is the open views. To assess Area 7A as moderate and Area 7 as high conflicts with this but the assessments allowed the inclusion in the 2015 NDP of Area 7A for 12 houses. The 2018 NDP presentation has removed these on the basis of the owner not wishing to develop. Our understanding is that the owner does not consider this to be an optimum solution for the growth in village housing but could make land available if other sites causing more damage to the village were proposed. **This site should be reinstated into the NDP.**

1.4.4: Area 11 opposite Brook House.

Following on from previous points we believe the LSCA assessment to be too severe compared with other sites and can be challenged. Whilst acknowledging notice needs to be taken of the flooding potential on the lower part this was obviously overcome with all of the development that now surrounds Brook House on two sides and the inclusion of area 21A which adjoins the brook. However, from an access (direct from Walwyn Road) and location point (near school), this area would provide a site for much needed smaller affordable housing for village families, with the stream area being developed in to a public amenity area using the footpath network already in existence. The idea that this is a natural break between the North and South of the village should be challenged as the railway bridge is the obvious natural break.

1.4.5: Area 21A & 21B - Field by the Thai Restaurant and to the West.

This area was part of Area 11 in the 2013 assessment and was set at the lowest level to be considered for any development. Despite having the same/similar characteristics (they have not changed) it has been removed from Area 11 and indeed 21A now has permission for housing. The inconsistency is baffling. We assert that other parts of Area 11 (and Area 9) can be reassessed. Furthermore, we contend that other small areas in the village can be reassessed and the

settlement boundary stretched in small ways to allow smaller developments through the village as requested in the village responses in 2013.

1.4.6: Area 6 – 1&2 Barton Villas.

We understand that part of this area is currently large gardens for the Villas. The owner is ready and able to develop a small site of houses for rent, a need in the village, with little impact on the surrounding areas. A part of this area is suitable for a developable site and is opposite area 5A which is currently in the medium/low to medium grading (see below). Area 21A was conveniently extracted from Area 11 in order for a housing site to be developed and we can see this as a strong precedent for Area 6.

1.4.7: Area 5A Tan House Farm

This is directly opposite Barton Villas and is rated with a landscape capacity of medium/low to medium. This appears inconsistent with the rating for Barton Villas (part of Area 6). In the NDP the site has been described as not available as currently built on. Has CPC investigated the possibility of some extra housing here?

1.4.8: Area 5 Behind Tan House Farm

There is an apparent inconsistency in so far as the LSCA grading is low to medium whereas the NDP describes “part of 5” as medium/low to medium. Has sufficient research been undertaken by CPC for this as a developable site as the comments in the NDP?

“re-site and re-build garages”

*“not previously suggested and therefore likely to be seen as offered because other sites removed for various reasons all of **which would** equally apply here”.*

These statements appear very dismissive of an area that could and should be looked at in light of the huge problem in finding suitable developable sites. Is this indicative of time pressures on the CPC to produce the NDP which have not allowed this option to be thoroughly investigated?

1.4.9: Area 15A in Mathon Road

This is the only site where the author of the LSCA stated housing would be suitable but it has disappeared completely in the 2018 NDP as a developable site. This should be included even if only a small number of houses are possible.

1.4.10: Area 19 Cowl Barn Lane

This area was included in the 2015 NDP as a site for 15 houses on the basis of its LSCA grading but is not included in the 2018 NDP. In our view **this is a prime example of the LSCA not being a reliable source for identifying sites for development** as the access and other aspects were always going to preclude any building here.

1.4.11: Other areas to be re-considered

The impending changes on the brownfield site of the Old Schweppes Bottling Plant must be resolved before the NDP reaches a final version. We understand that discussions are underway between various involved parties to replace the current permissions to build a Nursing Home with permission for 37 houses thus obviating the need to develop Grovesend Field and we suggest that CPC work pro-actively with the landowners to progress this permission.

This site is ideally suited for development in all relevant aspects, being a brownfield site, in the centre of the developed village, and with direct vehicle and pedestrian access onto the Walwyn

APPENDIX B – 2018 Regulation 14 Representation

road. To promote the development of sensitive sites where there is potential to address the housing needs using the Bottling Plant site would result in a very poor outcome for the village.

Other large areas which could provide housing AND are higher capacity than Grovesend are part of the Downs School (area 20) and Picton Gardens (area 1A).

The following questions arise:

- Are we sure Malvern College does not want any development on any part of this area? In the recent past the school sold a playing field for the development of Covent Gardens, 20 houses.
- Are we sure Pictons do not want to accept inclusion as 2018 NDP says “landowner timescale for development beyond the plan date” but 2015 NDP included housing here.

CPC should continue to discuss options for these two sites.

1.5 Access and servicing

The LSCA 2018 report para 2.2.28 clearly states. *“It is important to note that the LSCA only indicates the level of the capacity of an area in landscape terms to accept high quality residential development (see assumptions above). It does not consider other factors which may need to be taken into account in order to facilitate development, such as access or servicing for example, and which could give rise to adverse landscape and visual effects”.*

There is no evidence in the NDP that anything beyond the LSCA has been used to inform site selection. The failure to take other relevant factors into account, including access and servicing, is an omission which, again, could result in a poor outcome for the village.

1.6 Feed Back from Parishioners

There is a strong case to say that the NDP has given far too much emphasis to the LSCA and ignored the wishes expressed by the Village, as summarised in the feedback documents to the 2013 presentations. In other words key aspects of the NDP process and development impact have been ignored.

On the village NDP website are two slides summarising the views of the village (Included in the presentation on 10/10/2013). We particularly draw to your attention to:

- *Be ever mindful of the AONB, keep “green rural views”, protect green spaces*
- *Undesirable that the village should become fatter.*
- *Develop land in Mill Lane, develop next to the village hall.*
- *No development along Old Church Road.*
- *Take into account of the narrow and/or steep road access.*
- *Develop “hamlets” eg Cummins, Flapgate, Chance’s Pitch.*
- *Smaller developments in keeping with the village of 1, 2 and 3 bed.*
- *Edge of settlement should have a lower density of housing and not housing estates*

Key points from the Colwall Village Design Statement 2001 (Endorsed for material consideration when dealing with planning matters, by Herefordshire County Council (HCC) on 20th April 2001) set out below closely echo the village views from the 2013 consultation.

Para 4.1: *The pattern of development in Colwall can be described as linear, with settlement sited alongside the roads and lanes. Spurs off Walwyn Road form a herringbone pattern. The roads and lanes follow the natural contours of the land and as a result many of the houses are hidden from view from the Malvern Hills.*

Para 4.2: *Due to the predominately linear pattern a large proportion of dwellings back onto open countryside or public open space. This allows views out of the village to the Malvern Hills and surrounding countryside. Within the village, wide grass verges and the siting of buildings with surrounding space for vegetation gives an open green effect*

Para 4.4: *Within the village there are a number of green spaces which are significant in the pattern of the developed village area. Examples of significant open spaces regarded as “green lungs” areand the fields between Old Church Road and The Crescent.*

Para 4.5: *These spaces provide important visual gaps that break up the linear development and many residents value the views to the Malvern Hills that they give from within the village.*

Para 4.7: *The way that different areas of settlement blend into the landscape in an irregular and gradual fashion, with trees and open spaces providing screening and visual breaks, is of paramount importance and must be protected.*

General Guidelines on the Pattern of development state:

- *allow sufficient space to be able to retain the open green effect characteristic of the village and avoid overcrowding*
- *protect distinctive views into and out of the village which are afforded by existing open spaces*

Part of the NDP brief stated that *“The community, therefore, has a rare opportunity to determine where future development in the settlement should be located....”*

This latter point is important in that it is clearly the intent **that the community has the final judgement** in determining where future development should be located, not the assessor.

A primary purpose of preparing an NDP, and the reason for the legislation, is to allow the village to decide where needed development should take place. We contend that the 2018 NDP has paid insufficient regard to the results of the two major village consultations detailed above and the assessor should have given more weight to the community’s views when it came to site selection or the grading of the acceptability of different sites.

1.7 Summary and Conclusions for Appendix 1

There is ample evidence to support the view that the aims and objectives which led CPC and The Malvern Hills AONB to commission the LSCA have been compromised.

Amendments introduced between 2013 and 2018 studies which have been carried forward into the 2018 NDP, driven by external factors which have:

- eliminated previously acceptable sites for development;
- made it impossible for the writers of the NDP to reflect the needs and views of the village as expressed in the 2013 consultation and the Village Design Statement 2001 (one of the main objectives of the purpose of the whole exercise);
- compromised the integrity of the LSCA where capacity assessments in a number of areas have changed despite no outward change in the landscape being assessed;
- Forced the inclusion of significant development on Grovesend Field despite much evidence that the site is unsuitable for a number of reasons listed. Consequently, we are surprised and

APPENDIX B – 2018 Regulation 14 Representation

deeply concerned that the Colwall Neighbourhood Development Plan is proceeding with a strategy which is dependent on the development of Grovesend Field while a more acceptable alternative in the form of The Bottling Plant may become apparent in the short-term (as the Plan runs to 2030).

The above is a major element of our challenge of the NDP as currently written and we consider that further work, as suggested above, should be undertaken to ensure sites more suitable for the village are investigated thoroughly and re-incorporated in the NDP.

The application of an ad hoc and arbitrary planning decision by HCCs Planning Department on Colwall's proposed Settlement Boundary is directly responsible for the exclusion of the Mill Lane site (with its capacity for 21 houses) from the NDP and the inclusion of Grovesend Field as a site for 37 houses in the 2018 draft.

Not only is this contrary to the aims of the LSCA and the NDP, it is against HCC's own policy of not having settlement boundaries in its own Local Development Framework

APPENDIX 2: Housing Development in the AONB and Colwall Conservation Area

Figures 3 and 4 below show the outline of the AONB and The Colwall Conservation Area.

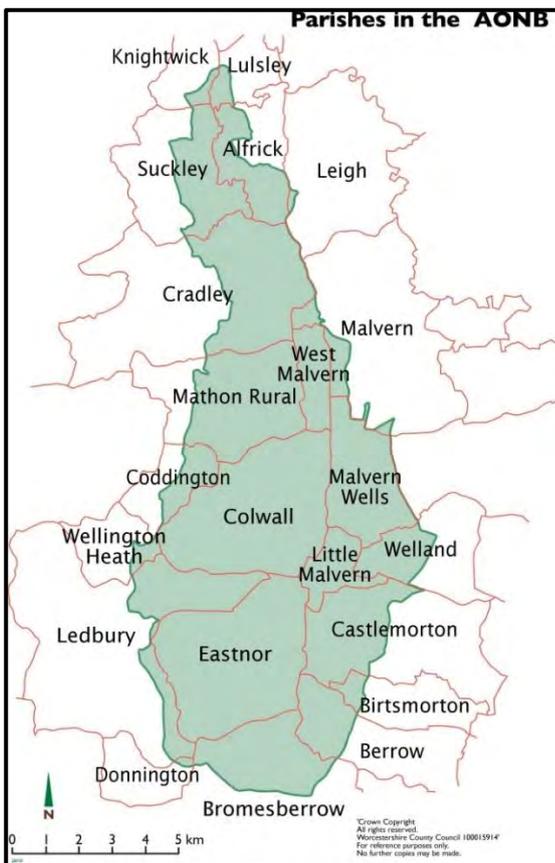


Fig 3: Malvern Hills AONB

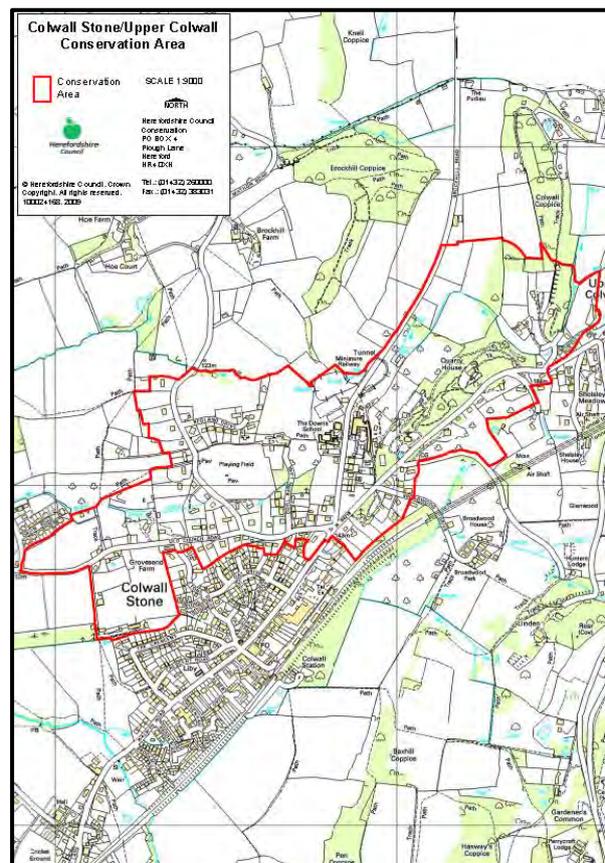


Fig 4: The Colwall Conservation Area, showing Grovesend Field under “Colwall Stone”

From the slides presented at the NDP meeting on the 31st January 2018, drawing from the National Planning Policy Framework (NPPF), it was stated that:

Plans ‘must be in general conformity’ with;

- *national planning - NPPF and*
- *the Local Plan (Core Strategy) (Herefordshire’s*

NPPF Paragraph 115

“Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.....”

NPPF Paragraph 116”

Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.....”

A quote from the AONB section of Herefordshire.gov.uk:

An Area of Outstanding Natural Beauty (AONB) is an area whose distinctive character and natural beauty is so outstanding that it is in the nation's interest to safeguard it. The landscapes of AONBs are equal in value to those of our National Parks and command the same levels of planning protection. Herefordshire has two designated AONBs; Malvern Hills and the Wye Valley, both of which attract large numbers of visitors to and from within the county.

APPENDIX B – 2018 Regulation 14 Representation

Figure 5 shows Grovesend Field within the conservation area, with arrows showing the important sightlines over this area.

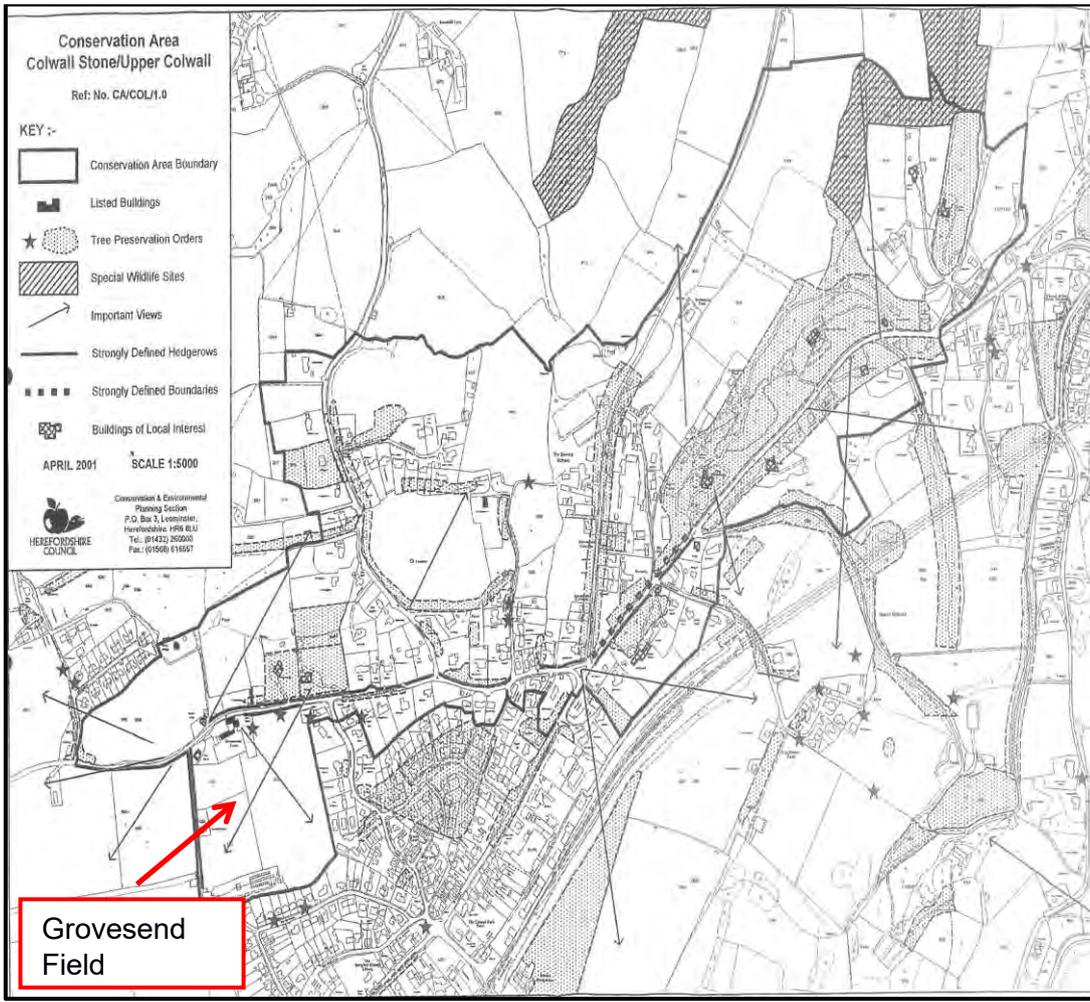


Figure 5 - Map taken from the 2001 Designation of Conversation Area document

From: https://www.herefordshire.gov.uk/info/200177/conservation/92/conservation_areas/2
Planning requirements in a conservation area

“Conservation areas are designated for their special architectural or historical interest. This includes the buildings, the interaction of spaces around them and natural features, such as trees and open spaces. Together these form distinctly recognisable areas of quality and interest. Once an area is designated, we are under a duty to prepare proposals to ensure the preservation and enhancement of the area.”

It appears that HCC has not given great weight to these NPPF requirements or to information published on its website.

2.1 Background

Colwall Conservation Area was established and gazetted in 2001 by Hereford County Council's Planning Services.

Grovesend Field is the only large and open field providing important views located within the Colwall Conservation Area.

It is adjacent to three Listed Buildings fronting Old Church Road (all designated a Heritage Asset):

Name	English Heritage Legacy ID
The Homestead (and Attached Stable Block)	151460
Barn House	151459
Winterslow	151463

The Homestead and attached Stable Block (one unit) was formerly known as Grovesend Farm. All three were listed on 19 September 1984.

Conservation Areas are defined as areas of special architectural or historic interest, covered by planning legislation, to preserve or enhance their character or appearance.

The proposed allocation of Grovesend Field for the development of what amounts to a modern housing estate conflicts with the primary purposes of both the AONB designation and its specific designation of the Colwall Conservation Area which is to conserve and enhance natural beauty.

2.2 Appropriate Legislation

Development in and around Listed Buildings and in Conservation Areas comes under the Town and Country Planning (Listed Building and Conservation Areas) Act 1990, especially Sections 66 and 72.

The National Planning Policy, contained in the NPPF requires that Local Planning Authorities (LPA's) should take account of:

- *S:72(1) requires special attention is paid to the desirability of preserving or enhancing the character or appearance of the Conservation Area*

Irrespective of any controls the planning authorities were to impose on construction in Grovesend Field **the very fact that the land might be assigned for housing development is a contravention of Grovesend Field's protected status.**

In confirmation of the above, the text of Section 66 (paras 1 & 2) – General Duty as respects listed buildings in exercise of planning functions reads:

- (1) *In considering whether to grant planning permission or permission in principle for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building **or its setting** or any features of special architectural or historic interest which it possesses.*
- (2) *Without prejudice to section 72, in the exercise of the powers of appropriation, disposal and development (including redevelopment) conferred by the provisions of sections 232, 233 and 235(1) of the principal Act, a local authority shall have regard to the desirability of preserving features of special architectural or historic interest, and in particular, listed buildings.*

The text of Section 72 – (para 1) General duty as respects conservation areas in exercise of planning functions is as follows:

- (2) *In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), **special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.***

*When considering the impact of a proposed development on the significance of a designated heritage asset, **great weight** should be given to the asset's conservation. The more important the asset (e.g. a listed building) the greater the weight should be.*

*Significance can be harmed or lost through alteration or destruction of the heritage asset **or by development within its setting.** As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.*

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimal viable use.

*Local planning Authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance and better reveal their significance. **Proposals that make a positive contribution to or better reveal the significance of the asset should be treated favourably.***

2.3 Conservation Area Application 2001 and inconsistency with LSCA assessment

To quote from the 2001 Conservation Area application by the Conservation Officer for Herefordshire Planning Services:

“The rural character is further enhanced travelling westwards along Old Church Road with buildings becoming more sporadic and an increase in open spaces and fields towards the edge of the settlement. A number lead north from the main road channeling views which terminate in woodland, reinforcing the sense of intimacy.

There are a number of open spaces, the majority of which are located around Old Church Road that make a significant contribution to its rural character and form a backdrop to Walwyn Road. These open spaces are an intrinsic element of this part of the village and they make a significant contribution to the character and appearance of the area. Their full importance can best be appreciated when viewed from Jubilee Drive on the Malvern's, from where they can clearly be seen to be an integral part of the nuclei of the proposed Conservation Area. They form a setting which reinforces and enhances the characteristics of the built environment and its immediate surroundings, as well as being a feature of high visual and physical quality in their own right.”

This highlights the subjective aspects of the LSCA where two different people have reached very different conclusions on the importance of Grovesend Field and its suitability for development.

We have been informed that a Conservation Area has no significance in the development of an NDP. Can it be clarified that this is the case and the rationale for that approach? Particularly when noting a recent statement from the Government:

Theresa May and Sajid Javid in Housing Development statements recently (February and March 18) quoted the Government and the current Conservative Manifesto stating they would be “maintaining the existing strong protections on designated land like the Green Belt, National Parks and Areas of Outstanding Natural Beauty....”

Other government statements – “National Parks and Areas of Outstanding Natural Beauty (AONBs) would be safeguarded under their reforms”

2.4 Summary and Conclusions for Appendix 2

Grovesend Field and its surrounding area lies within the area of the Malvern Hills AONB, has specific and significant mention in the Colwall Conservation Area and is adjacent to three listed buildings on Old Church Road, which forms the northern boundary of the field. Area 12 has been described as a “Green Lung” for the village and is clearly visible from the ridge of The Malvern Hills and any development would severely diminish the striking views from the Wyche Cutting to Black Hill.

The AONB, the CCA and the three listed buildings are the result of three separate and independent assessments the conclusion of which has been that there are areas and structures in and around Colwall that are sufficiently valuable to the community (both local and at large) that they should be afforded protection and conserved for future generations.

The Ministry of Housing, Communities and Local Government (6/3/2014) under the section, *Viability – a general overview*, states:

“.....identified plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.”

The construction of an estate of 37 modern houses in, on, and adjacent to these assets is a direct contravention of the ethos of these conservation and protection orders.

APPENDIX 3: ROAD AND INFRASTRUCTURE ISSUES

3.1 Background

As noted in Appendix 1.5, the LSCA says that there are other factors that could influence the selection of a site. One of these very pertinent to small rural roads is access.

- In the minutes of Colwall Parish Council for the 26th of April 2017 it was stated that HCC Highway's advice was for a maximum of 21 dwellings on Grovesend Field. On 26th July 2017, following further discussions with HCC and subject to the inclusion of a clause requiring suitable pedestrian access, HCC Highways would support the development of 37 homes;
- This assertion is contested. If the original viable estimate is for 21 houses it is difficult to understand how the provision of a footpath is justification for increasing the housing capacity to 37, particularly given the access constraints detailed below.

While there may be a view from Highways that a certain increase in vehicle traffic is acceptable, that does not change the fact that these are narrow and congested roads and that other sites have far better access and would reduce the risk of harm to pedestrians and to other motorists, and disruption to other residents.

Figure 1, at the start of the Appendices, highlights the access roads to the potential large development sites, and the main road through the village.

3.2 Access to Grovesend Field

The planned access to Grovesend Field is from Old Church Rd. This is the northern border with Stone Drive to the East and The Crescent to the South.

The minimum width for two-lane rural roads (i.e. for two cars to pass each other safely) is 5.5m. Where there is occasional bus or heavy goods vehicle use the minimum is 6m. More regular bus/heavy goods vehicles require 6.8m. The minimum width of single-track roads is 3.5 m for safety reasons. (Highway England/Government figures).

Vehicles will have three choices on how to reach the access point for the Grovesend site and all three choices are on very unsuitable, minor roads:

- Approaching from the north along Old Church Rd (a distance of some 600 metres) there is a very blind poor junction with Mathon Rd. which will become more dangerous with the increase in traffic. Below this junction the road narrows to 4m and the only way for vehicles to pass each other is to use entrances to private drives.
- Approaching from Old Church Rd from Mill Lane (a distance of 1100 metres) delivery vehicles using satnav and drivers who do not know the roads frequently access Old Church Rd from Mill lane. Most of this road from Old Orchard Lane junction to Mill Lane is Single track and often only 3m to 3.4 m in width. Even above the Old Orchard Lane junction there are very narrow parts of just 4.3m. The residents of this part of Old Church Rd will have many problems in the future and not just during the construction phase.
- Approaching from Stone Drive (a distance of some 500m), the area between Colwall Stone and the junction with Oak Drive is already very congested. The Colwall Pharmacy, Post Office and Surgery are in this area and the road is usually reduced to one lane for almost 100 m by cars parked on the western side. The rest of Stone Drive is narrow and winding with a completely blind junction onto Old Church Rd. This is already a very difficult junction that will inevitably become more dangerous with the increase in traffic. Additionally, traffic in Oak Drive is likely to increase as more vehicles will use it in order to avoid the congestion at the village end of Stone Drive.

No pavements exist in Old Church Road from the planned site entrance on Old Church Road to either the Mathon Road junction or the Stone Drive junction. Design guidelines for pavements are for 2-metre footways but there is no land for this as the road is already below current minimum design standards – only around 4 to 4.3 metres wide.

3.3 Access to other proposed sites

The Bottling Plant, Area 6 (Barton Villas and Gardens), Area 7A (West side of Colwall Green), Area 11 (opposite Brook House) and part of Area 5 all have direct access from the Walwyn Road and also have far fewer adjoining properties. Similarly Area 9 (by new school) has improved direct access towards Walwyn Road with new pavements and is supported by new footpath access alongside the Thai restaurant and a new pedestrian crossing.

All of these sites would be far easier to develop and would create less short and long term nuisance and danger to the village residents.

3.4 Summary and Conclusions for Appendix 3

Colwall Stone area is the most densely populated area and traffic congestion in the village is a problem. The 2013 village responses were clearly against the current proposals. An additional large development of 37 houses on Grovesend Field will simply exacerbate an already difficult situation as it would create substantial extra vehicular and pedestrian traffic on narrow roads and pose real dangers to both.

We consider that other sites are available which provide far easier access and far less disruption and danger to the residents, and these should be reinstated in the 2018 NDP.

APPENDIX 4: OTHER ENVIRONMENTAL AND HISTORICAL CONCERNS

Having pointed out in previous sections the significant discrepancies in the 2013 and 2018 LSCA, and the neglect of Government Planning Policy, the following should be taken into account in reviewing the inclusion of area 12A (Grovesend field).

4.1 Archaeology

Remains of a possible Roman settlement were identified when a report was compiled in February 2003 by a professional archaeologist Peter Ewence. The extent of the remains is mapped out and the report is held in the Herefordshire Council offices. The settlement is located under the grounds of Daylesford and Sherwood House (now Woodlea House) and extends directly westwards under Grovesend Field for some 400 feet or more. It may extend further across the rest of the field but we do not have access to this part of the report. Julian Cotton of the Herefordshire Council Archaeological Department is the contact.

4.2 Other Advisors

Historic England have advised us that they are one of the statutory consultees to report back to the Local Authority in this consultation period. They will assess all information of this nature. Other consultees are Natural England and the Environment Agency.

4.3 Other Environmental Aspects

Other research has highlighted that the whole of the field area is crossed with a pattern of field drains. There are indications that before the railway was built, there was a stream flowing down roughly along Old Church Road and through the dip at the side of Sherwood (Woodlea) House and into the field along the line of the old-field boundary.

4.4 Summary and Conclusions for Appendix 4

The LSCA has not taken due note of the archaeological and historic remains (it acknowledges there are many factors it does not take into consideration). As a result using the LSCA as the major influence on selection of deliverable sites without full reference to other factors has led to unsuitable sites being included and less sensitive sites being ignored.

APPENDIX 5: THE WAY FORWARD

It would be wrong to think that this document is critical of future housing development in Colwall. Nothing could be further from the truth. Additional housing, especially affordable housing, is essential for the village to develop. We have no survey to hand to prove this point but we would be very surprised to find that this view was not supported by the majority of the Parishioners.

We make the following points in a constructive manner:

A. In General Terms

1. Colwall has been allocated a target for housing development using a County-wide simplistic, pro-rata yardstick which makes no allowance for the more stringent planning criteria contingent on its location within the Malvern Hills AONB (See Section 2 for NPPF requirements). This is making the generation of an NDP acceptable to the village a more onerous task than it needs to be.
2. Located in an AONB, selection criteria for Colwall (and other communities in a similar situation) are more stringent therefore the Parish will find it more difficult to make it over the bar than non-AONB communities.
3. Proof of this is the fact that CPC is being forced in the current NDP to include land which several previous studies and surveys of Parishioners have classified as unacceptable for housing development (specifically Grovesend Field).
4. Ledbury Town Council, located outside the AONB, has already exceeded its housing requirement by over 146 houses and given that HCC core strategy runs to 2031 this may be exceeded further. Noting the different planning constraints implicit in their locations, Colwall should be able to use some of Ledbury's (non-AONB) excess and we support the CPC in their continuing to negotiate this point.
5. Any reduction in Colwall's housing development allocation removes the apparent (although disputed) need to develop Grovesend Field.

B. Specifically

1. We believe there are areas in Colwall which are amenable to housing development. However, more time is needed to fully evaluate and explore possible sites – see Table 2 below.
2. Table 2 shows a site comparison against some of the key criteria that should be used in promoting land in Colwall for development, and which are the focus of these appendices. Currently the NDP uses the LSCA as its sole tool in decision making. Table 2 brings in other aspects that are relevant to the village and should be used as part of the decision-making process. While there is a subjective element and different aspects could be argued, it is our assertion that all of the relevant criteria show that Grovesend Field is the least suitable of the large sites for development. If the NDP does not include a thorough range of factors relevant to the village to support its decisions, then it is fundamentally flawed.
3. The Colwall NDP has taken five years to get to its current stage; a few more months should make little difference and will allow more time for re-evaluating the possibility of using a range of more suitable sites, including the brownfield site on the Old Bottling Plant broadly seen as the best option for the balanced development of Colwall in the future.
4. To proceed with an NDP which includes Grovesend Field as a possible site for housing development risks its inclusion in the similar studies in the future.
5. It is our opinion (as Parishioners committed to Colwall) that every effort should be taken now to avoid the loss of an irreplaceable conservation area open space vital to the village.

Planning Guideline	Bottling Plant – No Area	Mill Lane – Area 9 & 9B(1)	Grovesend Field –Area 12A (12)
Landscape Capacity²	Brownfield (See Section 1.4.11)	For consistency, a more detailed capacity assessment with landscaping plans should be performed for the East part of the field. (See Section 1.4.1)	Below ‘Medium’. (See Section 1.4.2)
Vehicle Access	Direct vehicle access onto main road through village. (See Section 3.3)	Good access via Mill Lane to main road (wide, pavement). (See Section 3.3)	Poor access. Old Church road and Stone Drive narrow. (See Section 3.2)
Pedestrian Access	Good pedestrian access to village centre, close to all amenities.	New footpaths down Mill Lane could be extended by school. New access in North corner by Thai to new pedestrian crossing. (See Section 3.3)	No pedestrian access. Old Church Road too narrow for new footpaths. (See Section 3.2)
Conservation Area	No, and is a brownfield site.	Field has no particular features. Areas of woodland to the West can be retained and a new hedgerow acts as a natural barrier.	Yes, for reasons detailed clearly in the 2001 Conservation Application by Hereford Council. (See Section 2.1)
Character of village	Fits character of development off the main road.	Involves expansion into green fields, but better fits development of linear nature of village.	Considered ‘Green Lung’ for North of main village in multiple documents. Would cause significant ‘swelling’ of the village at its widest part, against its linear nature.
Village consultation	Developments in Walwyn Road preferred	Development supported in 2013 and 2015 responses	No development in this area

Table 2: Site Comparison: Red = Poorly suited, Amber = Some suitability, Green = Well suited

² Because Colwall is in an AONB, the capacity row is flagged as red for all areas below ‘Medium’ in ‘Capacity to Develop’, see paragraph 4.22 of the 2018 NDP, the text of which is reproduced in Section 1.4.1.

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 26 March 2020 21:10
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

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.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Xinyu
Last name	He
Which plan are you commenting on?	Colwall Neighbourhood Development Plan
Comment type	Objection
Your comments	I believe the development of Grovesend Field is really not a good idea, as Grovesend Field is within the Colwall Colwall Conservation Area / of historical importance to Cowall, also very narrow roads access to it. In contrast the Mill Lane site has excellent access, much better this site replace Grovesend Field.

Latham, James

From: Zoe Cartell Baker
Sent: 16 March 2020 12:07
To: Neighbourhood Planning Team
Subject: Colwall NDP

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.

Hello

We wish to ask that Mill Lane be added to the current Colwall NDP and Grovesend Field site be removed.

As residents at Fairfield, Old Church Road we feel strongly the Grovesend Field site is not appropriate for development and should be given greater protection as it lies within the Colwall Conservation Area. To allow it would call in to question the conservation area protection, especially in an area with listed buildings and of historical importance.

Old Church Road is already a road without pedestrian pathways and any increased flow of traffic would be dangerous. The Mill Lane site is already set up with better access to key parts of the village and well designed junction. It is less of a hazard to everyday village life and perfectly placed for families with children for the school.

Please consider these above points and remove the Grovesend Field site from the Colwall NDP.

With thanks and best wishes

Zoe Cartell Baker