

Neighbourhood Planning

PO Box 230

Blue School House

Hereford HR1 2ZB

12 th April, 2016

Dear Sir/Madam,

We are writing in support of The Breinton Neighbourhood Development Plan. As I am sure you are aware the Parish has a very special environment which we hope all development would recognise and be proportional. It would be a matter of great regret if Breinton became just another suburb of Hereford when it has so much to offer in terms of recreational space and local food production, and a number of other things.

We believe the plan provides sufficient capacity for the proportional development Hereford Council expects. The plan does not prevent appropriate development in our opinion. Our interest is, in particular, Policy B3 which covers housing elsewhere (covered by Policy B1 and B2) in the Parish, i.e. the Countryside. Like B1 and B2 it contains significant planning protection for the River Wye. We agree with these policies and also the way in which our Breinton policies (B1 – B3) support and combine with Herefordshire's own rural policies.

We also support policies B4 and B5 which deal with the re-use of empty buildings for housing, as well as trying to achieve a mix of housing types, tenures and sizes. Policy B6, which supports development that doesn't take too much land, where design is in keeping with the local area and which promotes high energy efficiency, also meets with our approval.

We hope our support for these aspects of the Breinton Parish Plan will be taken into consideration as part of the ongoing consultation process.

Yours faithfully,



Dr. A. E. And Mrs. B. Wild

Neighbourhood Planning Team,
Planning Services,
PO Box 230,
Hereford
HR1 2ZB



16th April 2016

Dear Sir/Madam,

Breinton Neighbourhood Development Plan Consultation

I am writing in response to the Breinton Neighbourhood Development Plan consultation that is currently taking place. I have lived in Breinton for over 20 years now, having first come to know it when I was member of Hereford Rowing Club, and training both around the quiet lanes and on the river itself. The River Wye has one of the best straight 2000m stretches of water in the west Midlands for rowing. Rowing on the River Wye highlights the range of wildlife living on and around the River Wye, which is well deserved in its European SAC status. The Breinton Neighbourhood Plan is a welcome document explaining the nature of this rural parish and the role it plays not just locally but in the wider community of Hereford.

Whilst Breinton is bounded to the East by Hereford City, it has retained its rural nature even though the historic City Centre is just over a mile away. The “Whitecross – Sainsburys” area which borders Breinton is the most densely populated part of Herefordshire with 7,900 people per square kilometre¹ and is one of the 3 areas (LSOAs¹) amongst the 25% most deprived in England in terms of the outdoor living environment². For this reason many people from the Whitecross- Sainsbury area regularly take advantage of and appreciate the benefit of Breinton’s rurality, green spaces, fresh air and quiet routes. In the area of Breinton where I live there is often more traffic from walkers and cyclists in a day than from cars, which shows how popular and important this area is for improving and maintaining the health of locals and the wider population of Hereford. For this reason I welcome the Neighbourhood Development Plan policies, in particular:-

1. Policy B10 - Movement – recognising the value of the network of quiet lanes, footpaths and bridleways which are all well used and provide many benefits.
2. Policy B9 -Protecting Green Spaces - which highlights some of the unique locations that draw people to this corner of Herefordshire.
3. Policy B11 – Green Infrastructure - which recognises the important environment that Breinton offers to wildlife and which also makes the area so attractive for recreation.

¹ The Population of Herefordshire 2015 Page 10 Strategic Intelligence Team V1.0

² Index of Multiple Deprivation 2015

Being located so close to the River Wye, which is the source of fresh water for the whole of Hereford and the surrounding areas, it is important that water quality is not damaged by future development. Just slightly upstream from Breinton the Cagebrook is already failing water standards, and further development in that area is constrained by the capacity of the local water treatment works within the village of Clehonger. Most of Breinton, like my own home, has no mains sewerage anywhere in the vicinity, properties instead relying on cesspits and soakaways in neighbouring fields. I therefore welcome that Policy B1 acknowledges the lack of sewerage capacity within the village and tries to ensure that any future development will not further damage the River Wye SAC.

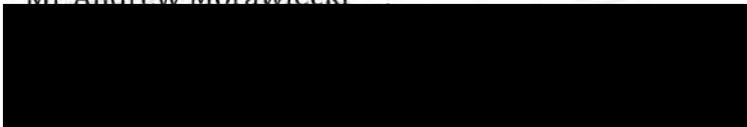
As someone with considerable experience in the food industry I am only too aware of the inability of the UK to produce sufficient food to meet national demand. In 2011 'agriculture, forestry and fishing' businesses accounted for a greater proportion of Gross Value Added in Herefordshire 10% vs just 1% for the rest of England³. I was pleased to see that the NPPF recognised the need to protect the nation's most productive agricultural land from development and ensure future food production. Once high grade land is lost it cannot be easily replaced, as soils take thousands of years to develop. I therefore support Policy B7 to protect the best and most versatile land from development, preferring instead to develop sites of lower grade land or land which has previously been developed.

I would welcome that any future developments would reflect the local housing needs survey and offer smaller properties, more appropriate for either older local people or starter homes for young people living in the area. There are already too many 3 and 4 bedroom properties, and it is disappointing to see that all the recent planning approvals in Breinton are for just 4 bedroom properties and will not deliver any social or affordable housing. I therefore welcome Policies B3 and B5 to address this situation and improve choice for the future.

I hope that these comments will be noted and that the Breinton Neighbourhood Plan, after considerable hard work from many capable volunteers, will be able to progress as a Planning Document that can direct future development in Breinton Parish.

Yours faithfully,

Mr Andrew Morawiecki



³ Office for National Statistics 2011

Latham, James

From: Newey, Angela
Sent: 19 April 2016 14:56
To: Neighbourhood Planning Team
Cc: Singleton, Kevin; Webster, Gemma
Subject: RE: Breinton Regulation 16 Neighbourhood Development Plan consultation

Follow Up Flag: Follow up
Flag Status: Completed

Dear James,

Thank you for consulting me on the Breinton Neighbourhood Plan Regulation 16. I have the following Planning Policy comments to make:

In terms of housing delivery the HMA target (18%) for Breinton Parish as set out in the Core Strategy equates to 72 dwellings. The Neighbourhood plan does not allocate sites for housing but it does identify settlement boundaries for Lower Breinton and Breinton Common. The Steering Group has produced a capacity study for the plan area which indicates a potential short fall of 19 dwellings against the 18% growth target for the HMA. Whilst this may appear to be a significant number I consider that there are two main factors that need to be taken into account for this particular NDP:

- 1) Given that the route of the Relief Road is still to be determined and that many of the Hereford Housing and Economic Land Availability Assessment sites lie within the corridor and will therefore require reassessment once the route is determined, it is difficult at this stage for the NDP to identify additional capacity at this stage.
- 2) Given the proximity of the Three Elms urban extension, this may cater for the housing needs of the Kings Acre area.

Therefore I recommend that the NDP makes specific reference to these issues and includes reference to a commitment to review the NDP with a view to allocating further land for housing in the second half of the plan period if necessary. Whilst I recognise that the Monitoring and Review section states that the NDP will be reviewed annually it would be advisable, given the shortfall in housing numbers and strategic issues such as the relief road and development of the Three Elms site, that this text should be expanded. It would also be helpful to include reference to this in the paragraphs following Policy B1.

Kind regards

Angela

Angela Newey
Senior Planning Officer
Forward Planning
Economy, Communities and Corporate Directorate
Herefordshire Council

Telephone: 01432 383637

From: Neighbourhood Planning Team
Sent: 08 March 2016 13:59
Subject: Breinton Regulation 16 Neighbourhood Development Plan consultation

Dear Consultee,

Latham, James

From: Anita Sancha
Sent: 18 April 2016 10:59
To: Neighbourhood Planning Team
Subject: I approve breinton parish plan.

Follow Up Flag: Follow up
Flag Status: Completed

Hi

I would like to say I approve the breinton parish plan.

Anita Sancha

Latham, James

From: Turner, Andrew
Sent: 15 April 2016 10:21
To: Neighbourhood Planning Team
Subject: RE: Breinton Regulation 16 Neighbourhood Development Plan consultation

Follow Up Flag: Follow up
Flag Status: Completed

Re: Breinton Neighbourhood Development Plan, 2011-2031- Regulation 16 Re-Submission Draft-February 2016

Dear Neighbourhood Planning Team,

My understanding is that no specific sites have been identified in this plan and as such I would advise:

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

General comments:

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

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

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

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

Kind regards

Andrew

Andrew Turner
Technical Officer (Air, Land and Water Protection),
Environmental Health & Trading Standards,
Economy, Communities and Corporate Directorate
Herefordshire Council, Blueschool House, PO Box 233
Hereford. HR1 2ZB.
Direct Tel: 01432 260159
email: aturner@herefordshire.gov.uk

From: Neighbourhood Planning Team
Sent: 08 March 2016 13:59
Subject: Breinton Regulation 16 Neighbourhood Development Plan consultation

Scanned

25/4/16

16th April 2016

Dear Sir/Madam,

Breinton Neighbourhood Development Plan Consultation

I would like to support the Breinton Neighbourhood Development Plan which is currently out for consultation. My family have lived and farmed in Breinton for a number of generations and the area is a very special area, with some unique and important habitats that include, and extend beyond, the River Wye SAC. Up stream.

Over the generations my family have maintained and expanded the range of old apple varieties, in particular Cider fruit trees. This has significantly expanded the genetic base of the orchards, improving the resilience of this species to disease and pests. The orchards in Breinton range from historic orchards grown on seedling rootstocks for cider, to more recently planted new orchards, which provide a range of fruit for niche and artisan cider producers, preserving the old cultivars by propagation on the advice of the head pomologist at Long Ashton Reserch Station. many of these were planted as triles in the early 1930 .and had planting plans which still exist. They also support the work of the Cider Museum and its Cider Festival every October, highlighting the role cider production plays in the local community. Cider production provides some of the higher paid jobs in the City of Hereford, as well as continuous employment for the local population since Messers Bulmers later H.P.Bulmer first started its cider production in the 1880s..

For this reason I welcome Policy B15 which promotes the conservation of distinctive local features including trees, orchards, hedgerows, archaeology and habitats for wildlife. In particular I cannot emphasise how important it is that this Neighbourhood plan recognises the traditional orchards, a number of which are in my family's ownership, as these contain a large number of rare varietal species. The orchards also provide a unique habitat which increase the local biodiversity.

Duirng the last few years a continental organisation has put up nest boxes and ringed migratory birds . A study done in all European countries but England until they came.

A woodland Trust wood- Drovers wood- The interest in this and other rural work to walkers is astonishing

Mixed deciduous woodland which was planted by myself and local volunteers to mark the turn of the Century. I welcome that Policy 9 – Designated Green Spaces recognises this woodland and the role it plays in providing important green space for local residents current and for generations to come.



I have long campaigned about the importance of high grade agricultural land and the role it plays in feeding our nation. I attended a meeting in Kew in June 2013 titled "Feeding the 10 Billion" (see attached document which gives a brief summary). I am passionate that brownfield and lower grade agricultural land should be developed before land of the highest grade if we are to feed our growing populations now and for future generations. I am pleased to see that the Breinton Neighbourhood Plan echoes the National Planning Policy Framework wording in its own Policy B7 – Protecting the best and most versatile agricultural land, soils and promoting agricultural development that protects the environment and preserves the distinctive rural landscape. The role of wildlife is important in pollination and naturally controlling pests and disease, and so I also support Policy B11 on Green Infrastructure and B15 Local Distinctiveness which recognises conserving wildlife and their habitats.

As a farmer with a network of fields across Breinton, Policy B10 on Movement is vital to prevent the Western Relief Road splitting fields and making it impossible for farmers to access all their land for cultivation. This policy also ensures that the footpaths, quiet lanes and bridleways can continue to be enjoyed by local residents of Breinton and Hereford.

The River Wye has been recognised as being a river unique not just to the UK but to Europe and so has been accorded the status of a Special Area of Conservation (SAC). Any development that should damage or risk this SAC should not be permitted. With my property and many other neighbouring properties there is no access to mains sewerage and this poses a real problem for any significant development to take place within Breinton Parish. Policy B1 helps clarify that any development must not impact on the River Wye SAC, and so accords with the protection that has been afforded by Europe to this beautiful river.

I would therefore like to confirm my support to the Breinton Neighbourhood Development Plan.

Yours faithfully,

Gillian



The Foundation and Friends of the Royal Botanic Gardens, Kew

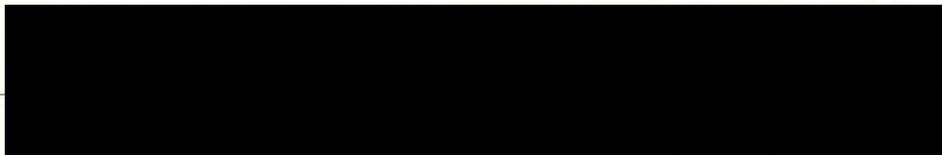
Patron: His Royal Highness The Prince of Wales

Kew
ROYAL BOTANIC GARDENS

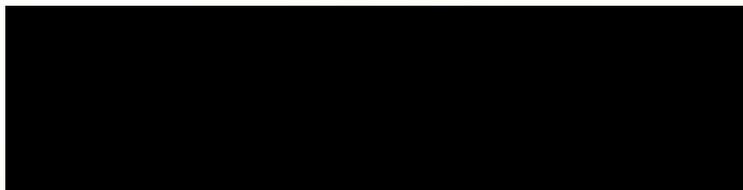
FEEDING THE 10 BILLION

Tuesday 18 June 2013
The Royal Society, London

Notes from the lecture



Please also read Document fr. Kew
^Feeding 10 Billion in 2050^



WITH COMPLIMENTS

Introduction - Yvonne Cooper

Since the current monarch was crowned, the world has gained an additional 4.5 billion people. The population is still growing and is predicted to hit 10 billion by 2050. How can we ensure that we have enough food to feed this growing population?

In this debate, we won't discuss ways that this growing population could be curbed by war or disease, but instead we will focus on how science can ensure enough food for all.

Opening Statements

Professor Charles Godfray

**Hope Professor, Ecology Research Group
Department of Zoology, Jesus College, Oxford University**

The future looks like this: we will have 10 billion people on earth by the mid-century, essentially 40% more mouths to feed. However, I am a cautiously optimistic that we can do it.

The growing populations will not all be poor. As they become wealthier they will have fewer children which will eventually curb population figures, but they will have richer diets and will eat more than today's poor.

It is simply not impossible for 10 billion people to have "our diet", i.e. the diet of the wealthy western world. That's not a reasonable aim. However, feeding 10 billion people is possible if we improve our governance and production systems. We will need to ensure that globalisation is in favour of people. The current levels of agricultural land will need to stay the same, but we will need to produce more from them with less environmental impact.

Dr Geoffrey Hawtin

**Founding Director
Global Crop Diversity Trust**

Is it possible to feed 10 billion people? Yes, however, we will need to:

- 1) produce more food
- 2) waste less – at the farm, production, and individual level
- 3) lower demand

1. How do we ensure we can produce more food. In the 1970s we faced massive starvation in India, amongst other places. The situation in India was so dire that some argued we should give up on it as a country and concentrate resources elsewhere. But the situation improved and ultimately science triumphed with the "green revolution". As a result India became self-sufficient and even started exporting food.

Our current challenge is not whether we can produce more food – science will ensure this is possible – the key issues are access to food and the quality of that food.

The solutions lie within plant genetics – to be able to feed everyone we need to conserve genetic diversity of plants. This genetic diversity will ensure that plants retain traits which enable them to withstand disease, climate change, drought and pests. Sadly, we have already lost much of this genetic diversity and much of the rest is threatened.

Agricultural seeds are well preserved in national and commercial collections, DNA and gene banks. But it's the other varieties – minor crops important to local communities, non-domesticated species, and wild relatives of domesticated species which need saving. If we don't conserve these, we will lose them, and the genetic material they contain. We are losing genetic material all the time. For example 90% of maize varieties that existed a hundred years ago no longer exist. Seed banks, such as the Millennium Seed Bank Partnership, need more funding to conserve what is left.

Kew's role in conserving genetic diversity is critical.

Dr Paul Smith
Kew's Head of Seed Conservation Department
and Millennium Seed Bank Partnership Leader
Kew Gardens

Kew has three elements which will help feed the 10 billion:

- 1) a collection of 400,000 species of plants
- 2) world-class expertise
- 3) global partnerships

Kew has 99.4% of plant diversity not found in agriculture or in other seed banks. This 99.4% gives us room to innovate and adapt for the future.

Despite this, 1 in 5 plants face the threat of extinction, ironically in part due the expansion of agriculture.

Kew's Millennium Seed Bank is working on many projects to help conserve genetic diversity and ensure our ability to feed as many as 10 billion people.

Kew's work with crop wild relatives is an expertise which will be very useful in the future. We have out-bred useful characteristics of our domesticated food. The wild relatives of domesticated ones will give us the traits we have lost and may find useful ones we will need - traits such as drought resistance. The Crop Diversity Trust conserves crop species. Kew's focus is wild species. PwC has recently valued Kew's collections of the relatives of 29 major crops and has estimated the worth to be in the 100s of billions of US dollars.

Kew also collects other species which are not domesticated but which may be useful in the future. For example, in our collections we have 12,000 edible plants including several thousand which are eaten but can cook be

foraged in the wild because we have not yet worked out how to grow them.

2

Many foraged edible plants have complex germination and local communities who rely on foraging them in the wild cannot grow them in their gardens. Kew uses its expertise to study these difficult seeds and pass on the knowledge to local communities. For example, in the "Difficult Seed Project", Kew asked communities in Africa which seeds would they like to grow themselves, and then invested research funds into studying the germination of these seeds and passing on the expertise.

If we preserve plant diversity it will allow us to innovate, adopt and improve the resilience of our own species.

Judith Batchelar
Director of Sainsbury's Brand
Sainsbury's Plc

Sainsbury's feeds 24m people every week and sources food from 64 countries. Our challenge in the future will be to feed more people with less impact on the planet.

We believe that Kew will help us do this in the following ways. For example, the coffee, tea and cocoa we buy has very narrow genetic diversity and this makes us very vulnerable. We support Kew's work in these areas to increase diversity in these valuable crops.

Kew also helps us protect ecosystems which are under further pressure from growing populations. For example, in Kenya we are working with Kew to restore forests by planting native species in areas which have been previously planted with non-native and damaging species.

Kew will also help us deliver new higher nutrient density food by introducing new edible plants into our diet. We all remember the new "avocado pear" which was introduced into the UK in the 60s. I believe that we will be introducing more of these great plants into our diets in the future through the help of Kew's collections and expertise.

Kew's role in feeding 10 billion people is in making science available to practitioners and the commercial industry. Kew can assist us in understanding how to help improve productivity and efficiency in our crops. Sainsbury's invests £10m pa in Research and Development in this area to help its farmers use the available science to improve their production. This type of investment would have been unthinkable 5 years ago and unimaginable 20

Sainsbury's is also very keen to cut down on food waste in pre and post production, where waste can be between 40 to 80%. It believes new relationships, such as the one with Kew and farming communities on the ground, will help solve this.

Professor Monique Simmonds
Head of Sustainable Uses of Plant Group
and Deputy Keeper Jodrell Laboratory,
Kew Gardens

What can Kew offer to help feed the 10 billion?

Kew can offer expertise and collections to help us better understand availability of food, food quality and food security.

Kew's collections: In addition to the Millennium Seed Bank, Kew has 7.5 million specimens in the Herbarium which can be used for research to identify the lost, out-bred traits in our food. Many of these traits, for example

3

which have anti-pesticide properties, taste bitter, so we have out-bred them to achieve desired sweetness. But now we may be interested in getting them back.

Kew's economic botany collection can tell us a great deal about the properties of some of the first productions of economic plants. For example, we have beans of cocoa used originally by Cadbury. Chocolate to develop their products. Kew's collections can tell us how that chocolate differs from what we grow now.

The collections also allow us to go back to where the plants originally came from, to source countries to look for lost traits and to understand habitats, and current challenges with crops due to changing climate. And the collections allow us to re-examine our assumptions using newest tools such as DNA studies.

Food security is a new challenge. There is an expectation that we know what we are eating and that it is safe. Recent news stories about meat products contaminated with horse meat has brought these concerns to the fore. It is important to know what we are eating, where it originates, and what substitutes are being used.

Kew's collections and expertise can help identify and trace substitutes and ingredients. We have our expertise and DNA and chemical techniques to identify substances. These are critical in a world where food prices are being driven down (encouraging substitution) and simple beans are complex. For example, dangerous substances for

...cinnamon and star anise are toxic but have been sold in the UK. Kew's collections have been used to develop simple tests to identify these.

Kew's historical and new collections are relevant and can help people by improving our food supply, food quality and safety.

Discussions

What are the solutions for translating science into practice? (question particularly for Judith)

At Sansbury's we found that when subsidies were removed from farming, this forced us to talk to farmers and build direct relationships with them. These relationships took 5 years to develop, but we now have access to those who grow our food and our development groups have been very effective in passing technology and science directly to the farmers. These relationships also have resulted in small holding farmers getting more access and help. Also our work with Kew will further this transfer of science into practice.

Isn't the number (10 billion) just growing and growing? Doesn't that temper optimism?

We will see population slow down as people become wealthier. For that to happen we need economic growth and education. Both are very effective at decreasing population without coercion. Every human has a right to safe and affordable food.

On the negative side, improvements in food production are getting smaller. We are down to achieving 1% increase in production per year. In this area, the low hanging fruit has been picked. However there is still cause for optimism: bio technology, DNA plant science and new gene discovery will increase innovation. But we need investment into these sciences.

Sadly in the UK, we have gone down from 31 world-class agriculture research institutions to 8. People want to spend less on food, and most don't know how to grow their own. In the farming industry, in the UK and globally, there is a large skills and capability gap. If we could only improve the bottom poor performing farms, this would be a huge impact.



The Coal
Authority



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Nottinghamshire
NG18 4RG

Tel: 01623 637 119 (Planning Enquiries)

Email: planningconsultation@coal.gov.uk

Web: www.gov.uk/coalauthority

For the Attention of: Mr J Latham
Herefordshire Council

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

07 April 2016

Dear Mr J Latham

Breinton Neighbourhood Development Plan

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

Rachael A. Bust *B.Sc.(Hons), MA, M.Sc., LL.M., AMIEnvSci., MInstLM, MRTPI*
Chief Planner / Principal Manager
Planning and Local Authority Liaison



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Breinton Neighbourhood Plan
Herefordshire Council Neighbourhood Planning Team

Our Ref: **RN/BNDP/April16**
Enquiries: Rhys Evans/Ryan Norman
0800 917 2652

18th April 2016

Dear Sir / Madam,

BREINTON NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION, APRIL 2016

Thank you for allowing Dŵr Cymru Welsh Water (DCWW) the opportunity to respond to the above consultation. DCWW appreciates the opportunity to respond and we offer the following representation:

Given that the Breinton Neighbourhood Plan has been prepared to take account of the policies set out in the Adopted Herefordshire Local Plan Core Strategy (CS), we are supportive of the vision, objectives and policies set out in the Neighbourhood Plan and have nothing further to add to our Regulation 14 consultation.

We do however wish to note that we are pleased with the addition of criteria "h" and "i" to Policy B1 and feel that they offer the assurance that new development will not be allowed to connect to the public sewerage network if it will cause detriment to the environment or our assets.

We hope that the above information will assist you as the Neighbourhood Plan progresses. Should you require any further information please do not hesitate to contact us at forward.plans@dwrcymru.com or via telephone on 0800 917 2652.

Yours faithfully,

Ryan Norman
Forward Plans Officer
Developer Services



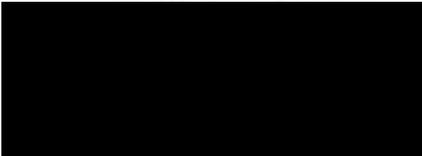
Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.
Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in
Welsh and English

Dŵr Cymru Cyf, a limited company registered in
Wales no. 2366777. Registered office: Pentwyn Road,
Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y
Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol
Pentwyn
Nelson, Treharris, Morgannwg Ganol CF46 6LY.



14th April 2016

Dear Sir/Madam,

Breinton Neighbourhood Development Plan Reg 16 Consultation

I am writing in response to the Breinton Neighbourhood Development Plan Regulation 16 consultation that is currently taking place. I welcome the Breinton Neighbourhood Development Plan which clearly recognises the important contribution this area plays in providing suitable, sustainable development within a rural area of Herefordshire. The plan also recognises the value this area has not just to Breinton Parish residents but also as a source of natural recreational areas, easily and safely accessible by walkers and cyclists, providing fresh local food production and enhancing the quality of the air and water enjoyed by the residents and visitors of Hereford City, which lies to the east of Breinton Parish.

Whilst Breinton Parish adjoins the City Boundary, many utilities, in particular mains sewerage and mains gas supplies are not available within the majority of the area of the Parish. This is a constraint on development within the area and this has been recognised by the Herefordshire Local Plan Core Strategy, which did not identify Breinton as a main settlement for housing development.

Breinton Parish has a dispersed housing pattern with no natural focus, and has a large proportion of the Counties best and most versatile agricultural land. Therefore the policies setting boundaries for Breinton Common, Lower Breinton and Kings Acre to help direct future development where it can be most sustainable is welcome. This Neighbourhood Development Plan builds on the policies of the Core Strategy for housing in rural areas and should be adopted as planning guidance for Breinton in the future.

In particular I welcome the following policies:-

POLICY B5 – ENSURING AN APPROPRIATE RANGE OF TENURES, TYPES AND SIZES OF HOUSES –All the latest planning permissions granted in Breinton have resulted in delivery of large family homes, invariably 4 bedroom properties. This policy B5 will help deliver the homes identified as needed by the parish to ensure mobility and opportunity of all generations to continue to live together within the parish in suitable, affordable accommodation. This policy will promote sustainable communities in the true sense of the word. Any further development within Breinton needs to properly consider the housing needs of the local community and address the imbalance that has happened with many recent planning permissions which have secured only large, family homes.

POLICY B6 – SUSTAINABLE DESIGN AND ENERGY EFFICIENCY. Development design which maximises energy efficiency is to be welcomed especially where there is no access to mains gas supplies in a large area of the parish, often resulting in average higher energy prices than for people living in urban areas.

POLICY B7 – PROTECTING THE BEST AND MOST VERSATILE AGRICULTURAL LAND, SOILS AND PROMOTING AGRICULTURAL DEVELOPMENT THAT PROTECTS THE ENVIRONMENT AND PRESERVES THE DISTINCTIVE RURAL LANDSCAPE.

This policy reiterates Policy 11 of the NPPF which recognises that high grade agricultural land is **Nationally a scarce resource**. Protection of high grade agricultural land for food is important as demand for food is expected to rise between 59%-98% by 2050 (Harvard Business School Report”

Global Demand for Food is Rising, Can we meet it?" - Maarten Elferink & Florian Schierhorn 7th April 2016). For this reason, lower grade land needs to be developed ahead of the best and most versatile land to ensure future food security for the nation and future generations, especially as global food production is becoming increasingly affected by the impact of climate change. This policy will also help minimise other impacts of climate change, in particular surface water flooding, which poses the greatest risk to existing homes and future housing developments within the Breinton Area.

POLICY B10 – MOVING AROUND BREINTON

The network of quiet lanes and intricate network of footpaths and bridleways across Breinton Parish are important for local residents and in particular many people living within the adjoining Hereford City, to access by walking or cycling, the important rural area that is Breinton parish. This policy recognises the role this network provides in improving and maintaining the health of many Herefordians as well as contributing to the tourism economy in a sustainable way and ensuring that any development minimises the impact on these resources enjoyed by so many. This supports Policy 13 – COUNTRYSIDE RECREATION which recognises the sustainable recreational benefits Breinton provides to other residents in Herefordshire, and to visitors to the county.

POLICY B11 – GREEN INFRASTRUCTURE

This policy is vital in maintaining and enhancing the wide diversity of wildlife in the very important range of habitats that exist across Breinton Parish, in particular its historic orchards and ancient hedgerows. Just within our own immediate area an historic orchard provides homes to all varieties of woodpeckers; owls (barn, tawny and small owl) and bats which can all be regularly seen from our property. The green infrastructure is also important as a way for wildlife to move safely around to ensure species perpetuation and genetic diversity to increase its resilience to other factors such as climate change and increasing loss of habitats elsewhere. Green Infrastructure also plays an important role in absorbing and reducing water flows into the River Wye from its catchment area across Breinton, as well as providing natural flood plains on its water meadows. These are all important in reducing flood impact on residents as over a third of the County's population lives with the City of Hereford, immediately downstream of Breinton Parish.

The remaining policies recognise much evidence of Breinton such as its landscape, local distinctiveness, its views and heritage assets in more details than was possible within the Core strategy. In this respect these policies build on, update and expand the incomplete evidence used in developing the Core Strategy, some of which had not been updated since 1997 in the biological records department, due to a lack of resource within Herefordshire Council.

I would like to thank the members of the Neighbourhood Steering Group who have worked so hard and committed so many hours in preparing this Neighbourhood Plan to truly reflect the unique and valuable environment and resource that is Breinton Parish.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

Mrs E Morawiecka

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 18 March 2016 15:04
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Follow Up Flag: Follow up
Flag Status: Completed

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	EMIL
Last name	MORFETT
Which plan are you commenting on?	BREINTON NEIGHBOURHOOD DEVELOPMENT PLAN
Comment type	Support
Your comments	<p>In our opinion, this plan represents a comprehensive analysis of the unique character and features of the neighbourhood and a balanced detailed considerate plan for its development. We moved from Kent to Herefordshire last year to retire. We chose to live in Breinton because it offered a beautiful unspoilt natural environment. We acquired a house with fishing rights to enjoy the unique quality of life on the River Wye. We were particularly interested to learn that the neighbourhood was working on a plan to enhance and protect this very special area. We share the same objectives as those in the plan and were delighted to read in Policy B1 that the Breinton Parish Council plans to retain the rural character of the parish through housing developments only in defined settlement areas and only on lower grade agricultural land where possible. We also support the development of new housing on rural exception sites provided they meet with the strict criteria outlined in Policy B3. We are passionate about the continued restoration efforts of the River Wye as a wildlife corridor and feel the policies are designed to ensure it is not reversed through ill-conceived housing developments with inadequate sewage treatment facilities. We support the policy objects of B10 to protect</p>

the designated rural quiet lanes. While we support the plan to mitigate the effects of new any road developments we would not support any major road developments without full environmental impact assessment and a balanced independent trade-off analysis of the alternative routes to avoid damage to this unique and protected SAC environment.

Latham, James

From: Crane, Hayley
Sent: 22 March 2016 11:10
To: Neighbourhood Planning Team
Subject: RE: Breinton Regulation 16 Neighbourhood Development Plan consultation

Follow Up Flag: Follow up
Flag Status: Completed

I've had a read through and am happy with the content.

Kind regards

Hayley

Hayley Crane

Commissioning Officer (Housing Development) | Housing Partnerships
Adults and wellbeing Directorate | Commissioning, Adult's Wellbeing & Independent Living Service
Herefordshire Council, County Offices
Plough Lane, Hereford
HR4 OLE



From: Housing Development
Sent: 08 March 2016 15:21
To: Crane, Hayley
Subject: FW: Breinton Regulation 16 Neighbourhood Development Plan consultation

One for you

Tina Wood
Commissioning Officer (Housing Development)
Commissioning | Housing Partnerships | Adult and Wellbeing Directorate
Herefordshire Council
Plough Lane
Hereford, HR4 OLE
Tel: 01432 261975



Historic England

James Latham
Technical Support Officer
Neighbourhood Planning
Herefordshire Council
Hereford
HR1 2ZB

Our ref:
Your ref:

Telephone
0121
6256887 Fax

16 April 2016

Dear Sir,

**BREINTON NEIGHBOURHOOD PLAN – REGULATION 16 PUBLIC CONSULTATION
DRAFT (RESUBMISSION)**

Thank you for the invitation to comment on the draft Neighbourhood Plan and we have no substantive comments to add to those conveyed in our earlier consultation response (25th March and 26 August 2015). That is, we are supportive of the content of the document, particularly the comprehensive treatment of the wider historic environment including non-designated heritage assets and its' emphasis on local distinctiveness and the conservation of the rural environment including orchards.

Overall Historic England consider the Plan to be a well-considered, concise and fit for purpose document that effectively embraces the ethos of "constructive conservation" and is a very good example of community led planning.

I hope you find these comments helpful. If you have any queries please do not hesitate to contact me.

Yours faithfully

Pete Boland
Historic Places Adviser



Historic England, 8th Floor, The Axis, 10 Holliday Street, Birmingham B1 1TG

Telephone 0121 625 6870 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Latham, James

From: Howells, Mathew
Sent: 20 April 2016 08:50
To: Neighbourhood Planning Team
Cc: Callard, Jeremy; Lane, Mairead
Subject: RE: Breinton Regulation 16 Neighbourhood Development Plan consultation
Attachments: Breinton NDP reply.doc

Follow Up Flag: Follow up
Flag Status: Completed

Dear Neighbourhood Planning Team,

Please find attached document comments relating to the Breinton NDP (comments shown in red):

Also, we would like to make the following general comments:

There are a number of planning policies in the Breinton Plan that are in potential conflict with the aims of the Core Strategy, in particular the delivery of the western relief road. It is our view that those policies should be reviewed by planning colleagues to ensure any potential conflict is minimised.

The current bus service levels are deemed appropriate for the demand and available funding. However should the area grow with increased housing we would re-examine the levels of provision.

Kind Regards
Mathew Howells
Senior Transport Planning Officer
Transportation - Planning
Herefordshire Council
P.O. Box 236
Plough Lane,
Hereford
HR4 0WZ
Tel: 01432 383143
E-mail: Mathew.howells@herefordshire.gov.uk

From: Howells, Mathew
Sent: 19 April 2016 15:51
To: Neighbourhood Planning Team
Subject: RE: Breinton Regulation 16 Neighbourhood Development Plan consultation

Dear Neighbourhood Planning Team,

With regard to the Breinton NDP. HC Transportation will be responding but I am aware that the deadline has been set for today. We will have a response ready by early tomorrow.

Kind Regards
Mathew Howells
Senior Transport Planning Officer
Transportation - Planning
Herefordshire Council
P.O. Box 236
Plough Lane,

Breinton NDP reply

Extracted from doc page 11:

Area	Settlement type	Estimated number of dwellings	Facilities				
			Shop	Church	Bus stop*	Post box	Notice board
Kings Acre Road	Extended ribbon development	205			x	x	x
Breinton Common	Cluster	35				x	x x
Lower Breinton	Cluster	22		x			x
Cranstone	Ribbon, isolated individuals	20					x
Lane to Breinton Common	Ribbon, isolated individuals	20					
Warham	Isolated individuals	19					x
Breinton Lane	Ribbon, isolated individuals	15	x (seasonal farm shop)			x	
Upperhill Farm and Little Breinton area	Isolated individuals	14					
Adams Hill	Cluster	10				x	x
Veldifer	Cluster	7					
Green Lane Park Homes	Static caravans	30					
Village Hall	Isolated individual						x x
TOTAL		397**					

Notes: * the bus stop is on the A438, the northern boundary of the Parish. ** This figure is based on the number of monthly newsletters delivered by the Parish Council and is slightly lower than the 2011 Census figure of 401 households. None of the other 35 potential services / facilities listed in the Rural Settlement Hierarchy Background Paper (2010) produced by Herefordshire Council exist in Breinton

Comment:

Figure 2. Not sure what the single X means in the Bus Stop table, but for context, there are four stops in each direction within the parish with peak hour servicing offering three or four buses an hour. Throughout the day two services between them provide two buses an hour each way.

Extracted from page 12 para 1.9

1.9 Cyclists continue to lobby Herefordshire Council for a cyclepath along Kings Acre Road (which has a 40mph speed limit). Breinton is criss-crossed by many footpaths and historic bridleways (Figure 1). The historic Green Lane bridleway (a former drove road) is popular with walkers and cyclists as it travels in a straight line along the flat summit of the east-west ridge between Westfaling Street in Hereford and Breinton Lane at Cranstone. The route of the Wye Valley long distance walk runs through Breinton (Figure 1).

Comment:

Cyclepath along Kings Acre Road is one of the things we're asking the Three Elms developers to provide between their access and Whitecross roundabout. Should this go ahead we can look at continuing this out to Wyevale, however, we have also asked developers to provide a link across their site between Kings acre Road and Whitecross School which will link into Hurdman Walk and provide an alternative to Whitecross Road and the roundabout for less confident cyclists.

Extracted from Page 65 last paragraph

Policy B4: Re-use of empty buildings for housing:

Proposals to re-use existing buildings for new or improved community assets as well as meeting criteria (a) to (f) should also be in sustainable locations offering users access by a range of modes of transport, including walking.

Suggested change

Proposals to re-use existing buildings for new or improved community assets as well as meeting criteria (a) to (f) should also be in sustainable locations offering users access by a range of modes of transport, including walking and cycling.

Additional comment

We would like to see cycling referenced in policies B1-B4 as a viable mode of access.

Extracted from page 76

POLICY B10 – MOVING AROUND BREINTON

THE EXISTING ROUTES SHOWN ON FIGURE 1, EXCLUDING THE A438, WILL BE PROTECTED AS QUIET LANES.

Comment

Figure 1 is a snap shot of the local OS. The term “[Quiet Lanes](#)” has a specific legal definition and previous attempts to introduce Quiet Lanes in the county have been unsuccessful. Would be better to say something like “the quiet lane character will be protected” if this is compatible with our Core Strategy ... (not sure).

Sub-para l. and Sub para g. should cross refer to B11

Extracted from document Page 81

POLICY B11 – GREEN INFRASTRUCTURE

THE GREEN INFRASTRUCTURE NETWORK IDENTIFIED ON FIGURE 6 WILL BE PROTECTED AND ENHANCED.

DEVELOPMENT PROPOSALS WILL ONLY BE PERMITTED WHEN IT CAN BE DEMONSTRATED THEY HAVE TAKEN ACCOUNT OF THIS IDENTIFIED GREEN INFRASTRUCTURE NETWORK, AND WHERE POSSIBLE SOUGHT TO ENHANCE AND EXTEND THIS NETWORK. PROPOSALS SHOULD ALSO, WHERE POSSIBLE, INCLUDE ECOLOGICAL ENHANCEMENTS, FOR EXAMPLE FOR ROOSTING AND NESTING AND BY USING NATIVE SPECIES IN ANY PLANTING.

DEVELOPMENT PROPOSALS LEADING TO LOSS OR BREAKS IN THIS NETWORK OF GREEN INFRASTRUCTURE WILL NOT BE PERMITTED, EXCEPT WHERE REPLACEMENT OF A SMALL AREA OF BIODIVERSITY POOR HABITAT (SUCH AS A SPECIES-POOR HEDGE) IS UNAVOIDABLE. IN SUCH CASES

MITIGATION OR COMPENSATION SHOULD BE PROVIDED ELSEWHERE IN THE NEIGHBOURHOOD PLAN AREA.

Background/Justification

Green infrastructure is the network of natural and semi natural areas, features and green spaces in rural and urban, terrestrial, freshwater coastal and marine areas which together enhance ecosystem health and resilience, contribute to biodiversity conservation and benefit human populations through the maintenance and enhancement of ecosystem services. Breinton is fortunate to have a significant network of intact green infrastructure assets such as green spaces, hedges, woodlands, green routes, rivers, ponds and streams. All are included in “enhancement zone HerLEZ1” in Herefordshire’s Green Infrastructure Strategy. Much of Breinton’s green infrastructure is multi-functional providing recreation opportunities, helping with flood management, climate change, supporting biodiversity and delivering a wide range of environmental and quality of life benefits for local communities in line with the NPPF.

Suggested comment

Last para needs to refer to Policy B10, sub-para g.

Latham, James

From: Kinsey, Nadine
Sent: 18 April 2016 15:00
To: Neighbourhood Planning Team
Cc: Webster, Nick
Subject: Breinton Neighbourhood Plan Comments

Follow Up Flag: Follow up
Flag Status: Completed

Hi NPT Team

Just a couple of comments on the revised Breinton Neighbourhood Plan from the Economic Development Team:

POLICY B4 – RE-USE OF EMPTY BUILDINGS FOR HOUSING

THE RE-USE OF EMPTY BUILDINGS FOR HOUSING WILL BE SUPPORTED WHEN THEY MEET ALL OF THE FOLLOWING CRITERIA:

a. THE BUILDINGS ARE GENUINELY NO LONGER NEEDED FOR THEIR PREVIOUS USE; - [does this mean economic use too i.e. no longer viable for economic use prior to being given residential planning permission?](#)

Good to see that Veldifer site is being retained for employment use. Due to its proximity to Hereford it would not seem appropriate for large amounts of additional economic employment land to be identified within the parish.

In terms of presentation – I agree with one of the comments raised in the consultation statement that the sections of uppercase text are difficult to read and it might be worth editing to include more reader friendly fonts.

There doesn't appear to be a great deal of detail on the WRR within the Plan and how it impacts on the other areas of growth, however, it is now acknowledged within the document and appears to be in conformity with the Core Strategy.

Kind Regards
Nadine

Nadine Kinsey
Economic Development
Herefordshire Council
County Offices
Plough Lane
Hereford
HR4 0LE

Tel: 01432 260706
Mobile: 07792 880355
Email: nkinsey@herefordshire.gov.uk



Your Gateway to Business Support

The Marches Growth Hub is supported by a comprehensive business support website www.marchesgrowthhub.co.uk and a dedicated

Neighbourhood Planning
PO Box 230
Blueschool House
Hereford
HR1 2ZB
Sent via email to neighbourhoodplanning@herefordshire.gov.uk

14 Regent's Wharf
All Saints Street
London N1 9RL

020 7837 4477
london@nlpplanning.com

nlpplanning.com

Date 19 April 2016
Our ref 31292/SSL/DD/11053966v3
Your ref

Dear Sir/Madam

Breinton Parish Council, Neighbourhood Development Plan (February 2016) – Three Elms (HD5)

On behalf of our client, the Church Commissioners for England ('the Commissioners'), we are pleased to provide our representations to the Breinton Parish Council Neighbourhood Development Plan ('NDP'), which was published for consultation on 8 March 2016, and would like to thank the Parish Council for the opportunity to engage in their NDP process.

The Church Commissioners

As you may be aware, the Commissioners own land in Herefordshire including in and around Hereford itself but also in other areas. The Commissioners have actively engaged with Herefordshire Council ('HC') to promote an allocation for the Three Elms site (Western Urban Expansion area) as part of the Council's Core Strategy (Policy HD5). The Commissioners are now engaged in pre-application discussions with HC ahead of an outline planning application for the development of the site, which is to be submitted over the coming months.

The Commissioners welcome the opportunity to assist the Parish in preparing its NDP and look forward to liaising further to see how the development of the Three Elms site can complement the future objectives of Breinton.

Herefordshire Planning Policy

The Commissioners welcome the acknowledgment that the NDP will seek to manage the integration between the development of the Three Elms site and Breinton and are committed to securing a planning permission which realises this integration positively.

Policy B10 (Moving around Breinton)

With respect to the 12 points identified in the second element of this Policy B10 (d – o) the Commissioners note that the specification and design of the Herefordshire Relief Road (HRR),



which may run through the Three Elms site, will be dictated by its role and function as confirmed by the adopted Local Plan Policy HD3 also by the requirements of both Highways England and HC. Given this policy context it is considered that Policy B10 should be amended to reflect this policy context to ensure that the policy is sound.

Whilst the Three Elms site, and section of the HRR that could potentially fall within it, does not lie within the boundary of the proposed Breinton NDP, the Commissioners will carefully consider the impact of traffic on the highway network during the development of the proposals. A detailed Transport Assessment will accompany the final application submission and will identify potential impacts and suitable mitigation measures for the development of the site, where required.

Policy B13 (Countryside Recreation)

The justification for this policy includes reference to the impact of the Three Elms site. Whilst it is recognised that the development of the Three Elms site will alter the present openness of the area, it should be noted that the Commissioners' proposal for the development of the site incorporates:

- 1 A significant area of open countryside recreation space along the Yazor Brook corridor;
- 2 Landscaped areas of public realm and play space throughout the site;
- 3 New playing fields and recreation space adjacent to the existing Whitecross school;
- 4 A landscaped green buffer between the potential HRR route and residential areas;
- 5 Areas of high quality informal outdoor open space; and,
- 6 Ecological protection and enhancement measures.

It is envisaged that the proposals would deliver a high quality environment for existing and future parishioners, which would contribute positively to this area of Herefordshire.

Conclusions

We would be grateful for your confirmation that our representation has been duly received and will in due course be considered by the Parish Council. In addition, we would appreciate if you could keep us informed of your timetable for taking the document forward.

The Commissioners' team is currently in the process of preparing material to be presented at a public exhibition to update the local community on the emerging proposals for the site. This event is currently anticipated to be in the first week of June. We will be issuing invites in advance of the event and will contact the Parish directly to arrange for a preview of the proposals if that would be welcome.

Please contact me or my colleague Daniel Di-Lieto if you would like to discuss.

Yours sincerely

Pauline Roberts
Planning Director

Copy Joanna Loxton (Church Commissioners for England)

17 March 2016

Dear Sir / Madam

Breinton Neighbourhood Plan Consultation SUBMISSION ON BEHALF OF NATIONAL GRID

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

About National Grid

National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.

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

Specific Comments

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus.

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

Gas Distribution – Low / Medium Pressure

Whilst there is no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact plantprotection@nationalgrid.com

Key resources / contacts

National Grid has provided information in relation to electricity and transmission assets via the following internet link:

<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

Gables House
Kenilworth Road
Leamington Spa
Warwickshire CV32 6JX
United Kingdom
Tel +44 (0) 1926 439 000
amecfw.com

Amec Foster Wheeler Environment
& Infrastructure UK Limited
Registered office:
Booths Park, Chelford Road, Knutsford,
Cheshire WA16 8QZ
Registered in England.
No. 2190074



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

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

Robert Deanwood
Consultant Town Planner

n.grid@amecfw.com

Amec Foster Wheeler E&I UK
Gables House
Kenilworth Road
Leamington Spa
Warwickshire
CV32 6JX

Ann Holdsworth
Development Liaison Officer, National Grid

ann.holdsworth@nationalgrid.com

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

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

Yours faithfully

[via email]

Robert Deanwood
Consultant Town Planner

cc. Ann Holdsworth, National Grid

Date: 04 April 2016
Our ref: 180835
Your ref: Breinton



Mr J Latham
Technical Support Officer
Neighbourhood Planning, Strategic Planning & Conservation teams
Herefordshire Council
Planning Services
PO Box 230
Blueschool House
Blueschool Street
Hereford
HR1 2ZB

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

neighbourhoodplanning@herefordshire.gov.uk

Dear Mr Latham,

Re; Breinton Neighbourhood Development Plan - Regulation 16

Thank you for your consultation on the above dated 08/03/2016

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Breinton Neighbourhood Development Plan

Natural England acknowledges the strengthening of policies B1 (h), B2, B3 and B18 to ensure there will be no likely significant effects on the River Wye SAC.

Habitats Regulations Assessment (HRA) Report and Addendum

We confirm that having read the HRA Report and Addendum, we agree with the conclusion that the Breinton Plan will not have a likely significant effect on the River Wye SAC.

Environment Report

Natural England welcomes the production of an Environmental Report. Having reviewed the report Natural England confirms that it meets the requirements of the Strategic Environmental Assessment (SEA) European Directive and national regulations, and that we concur with its conclusions.

For clarification of any points in this letter, please contact James Hughes on 0300 060 3900. For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

James Hughes
Planning Adviser
South Mercia Team

Latham, James

From: Peter Hands
Sent: 11 April 2016 10:36
To: Neighbourhood Planning Team
Subject: Breintons Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Completed

I write to confirm that my wife Gillian and I have been consulted regarding the above plan and totally support the Parish Councils submission.

We agree with the Breinton Neighbourhood plan.

Yours sincerely

Peter & Gillian Hands

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 17 March 2016 11:45
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Follow Up Flag: Follow up
Flag Status: Completed

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Patricia
Last name	Ronan
Which plan are you commenting on?	Breinton Neighbourhood Plan
Comment type	Support
Your comments	<p>We have just moved to Breinton and are stunned by how well cared for and pristine this environment is. The wildlife is only second to New Zealand and we are now trying to keep records of the abundance of fauna and flora that we observe daily in our immediate area. We are fully in support of the Breinton Parish Council's plan, and thoroughly hope that Herefordshire Council will see fit to conserve this incredible area. The Parish Council has made its best endeavour to ensure the protection of the rural character of this neighbourhood. Herefordshire is probably the only county left in England that is properly rural. We have watched the countryside in the South East of England being concreted over and villages merge into towns that are more than 10 miles away. This is normal now almost everywhere. Although there is pressure of population, people need feeding and wildlife needs a home. Native wildlife ensure the viability of crops. We believe that it is a mistake for Herefordshire Council to bow to national policy on accommodating population through increased housing. We believe that Herefordshire Council should make a case to protect this amazing countryside for the benefit of the population. We have met many learned people in this neighbourhood who have valid and workable proposals to ensure the viability of this</p>

beautiful county in the long term whilst dealing with its modern urban pressures. We hope that Herefordshire Council will have the sense and foresight to listen to them. Once it is gone, it is gone. Please do not build over the last bit of paradise that is Herefordshire!

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 30 March 2016 09:50
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Follow Up Flag: Follow up
Flag Status: Completed

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Richard
Last name	GRIFFITHS
Which plan are you commenting on?	Breinton Neighbourhood Plan
Comment type	Objection
Your comments	<p>Broadly I support the extensive work that has been undertaken bringing this document to this stage however I have significant concerns about the policies relating to future housing development. Policy B1 states that "housing will be supported within or adjoining the defined settlement boundaries of Breinton Common and Lower Breinton" whereas Policy B2 states that housing will only "be supported within the defined settlement boundary" of the Kings Acre area. Both of these areas are clearly defined on the relevant maps. The outcome of this difference in approach is that it will be more likely for housing to be built in the areas covered by policy B1 and it is my understanding that this is against National Planning policies because both of these areas are more environmentally and landscape sensitive and do not have access to services from a sustainability perspective. Further encroachment into land adjoining these settlement boundaries would have an adverse impact on the rural nature of these parts of the parish. In contrast the Kings Acre area of the parish is already a significantly built up environment and has good access to services including walking routes to schools, bus routes, shops, churches and employment opportunities. The boundary settlement area for Kings Acre is too restrictively defined and fails to acknowledge recent successful</p>

planning applications at Hala Carr Nursery, land at the rear of Bramley House and Breinton Lee, all outside the Neighbourhood plan's defined settlement boundary. As part of the early public consultation exercise there was significant support, from those that accepted that there is a need for more housing, for this to be in the Kings Acre area rather than the more environmentally and landscape sensitive areas of the parish. This appears to have been ignored in this document. Taking into account the current restrictions on development within the Kings Acre area due to the protection of the Western Relief road corridor these policies, as they stand, will result in Breinton Parish meeting its "quota" of new housing by allowing building in Breinton Common and Lower Breinton which would have a significant impact on the rural environment. I would suggest that the wording of these policies need to be reversed to allow consideration of land adjacent to the Kings Acre Settlement boundary and have a more restrictive policy of only allowing building within the boundary settlement area for Breinton Common and Lower Breinton to offer a greater degree of protection to these more sensitive areas.

Latham, James

From: Brian Lunt
Sent: 18 April 2016 12:19
To: Neighbourhood Planning Team
Subject: Breinton Neighbourhood Development Plan(BNDP)

Follow Up Flag: Follow up
Flag Status: Completed

Sheila and Brian Lunt

We have looked carefully at all the policies and proposals of the BNDP Regulation 16 Re-Submission Draft Jan. 2016.

We've lived at REDACTED for more than 20 years and have a deep affection for the area, it's environment, it's ecological integrity, the many species that live here, the peace, quiet and beauty, all of which are of great importance to us. We're not opposed to more housing - people need somewhere to live- but we are opposed to more large-size expensive housing, there's already too much in rural areas and not enough affordable housing. Young people's housing needs are not being met.

Breinton Parish Council, together with the people who live here, have put together a much needed Neighbourhood Development Plan which will promote a level of housing growth to help meet Herefordshire housing targets. Care has been taken so that future housing growth is proportionate to the size of Breinton Parish and its settlements and ensures that the parish maintains its essentially rural quality.

We fully support the policies and proposals of Breinton Neighbourhood Development Plan.

Sheila and Brian Lunt

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



APPLICATION DETAILS

202479 /
Breinton 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

Our comments are with reference to the potential impact on the amenity – in terms of noise, dust, odours or general nuisance to residential occupants that might arise as a result of any new residential development.

We suggest an amendment to Policy B1 Criteria for Housing Development in Breinton to the effect that new dwellings be so sited so as not to be harmful to future occupants (as there is with Policy B2). We also recommend that this criteria be applied to Policy B4 Rural Exception Sites and Policy B5 Kings Acre Road as well.

Signed: Susannah Burrage
Date: 30 March 2016

Breinton NP Consultation

Dear James,

I ask that the small paddock coloured green on the attached plan which shows the outline of the Breinton NP be included in the plan before it is approved.

The site is situated at the end of a private cul de sac, with access to the main A438 highway and within a 40 mph speed limit.

The site is within short and easy walking distance of all local amenities, which include primary school, bus service, public house, recently constructed cycle way into the city plus Wyevale shopping complex and restaurant.

All mains services are available on site, so it goes without saying that it is fully sustainable.

Planning permission recently granted on adjacent land to the west, and there are existing dwellings immediately to the east.

The core strategy emphasises that any suitable land immediately adjacent to the edge of the local neighbourhood plan boundary should always be sympathetically considered.

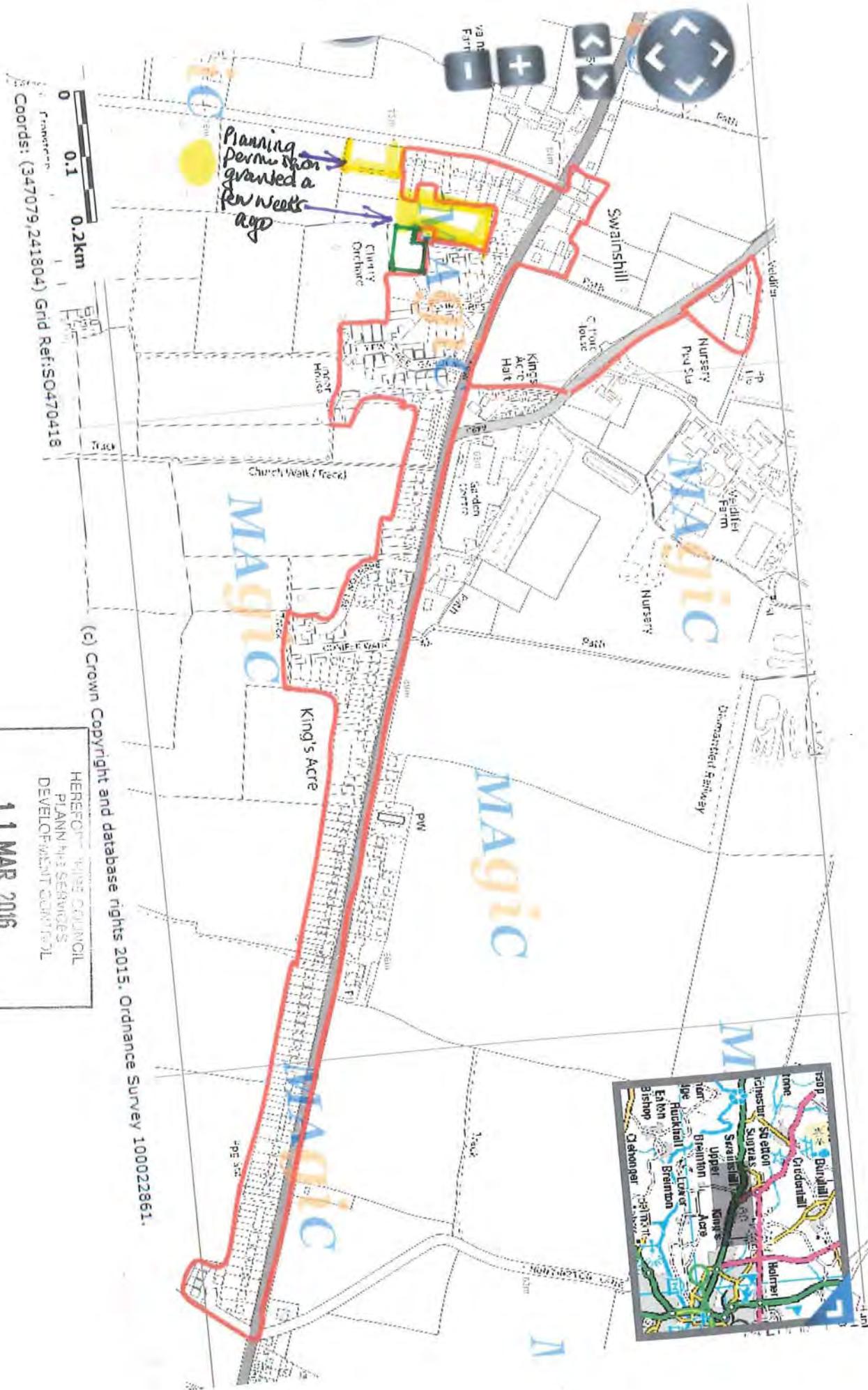
I strongly believe that, for the reasons given this site should be incorporated into the plan, because it would appear the case for doing so is, I suggest overwhelming.

In view of the above I hope that you will be able to give this request your favourable support.

Yours sincerely


S Matthews





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HEREFORD & WYRE COUNCIL
 PLANNING SERVICES
 DEVELOPMENT CONTROL
11 MAR 2016

To:
 Ack'd:
 File:

Latham, James

From: Victoria Wegg-Prosser
Sent: 13 April 2016 17:07
To: Neighbourhood Planning Team
Subject: Response to Breinton Parish Neighbourhood Development Plan Reg'n 16 Consultation

Follow Up Flag: Follow up
Flag Status: Completed

From Stephen and Victoria Wegg-Prosser,

Thank you for giving us the opportunity to comment on Breinton's Neighbourhood Development Plan. We wish you to record our support for the Plan. It represents a lot of work done by all concerned who have each helped to make this a Positive Plan, one that everyone can endorse. We hope the Planning Inspector will share this view, and give the Plan a 'Green Light'. After a lengthy period of uncertainty, it will be so useful to be able to say "This is the Plan – it protects the unique characteristics of Breinton and points the way forward to 2031."

1. We particularly wish to support Policies B1 and B3. We understand the Capacity Study shows that Breinton can achieve around 70% of its housing allocation from current approvals and anticipated windfall sites. It appears that more sites will come forward alongside Kings Acre Road and Policy B2 will permit sustainable development within that area. We were party to assisting our gardener gain planning permission for a small cottage in Breinton which would have fallen within the category B3. It is vital that exceptions such as this are permitted, subject to infrastructure and environmental constraints.
2. Regarding Policy B7, we believe that agricultural development should be promoted that protects the environment and preserves the rural landscape, but we have concerns that this wording does not include any reference to broiler units which we would wish to recommend should be specifically excluded from Breinton. The roads are too narrow to allow large scale movement of chickens in trucks, and the likelihood of contamination from broiler units in the vicinity of the River Wye SAC is a serious possibility. Furthermore, the contamination from any significant road building, such as the proposed but expensive and unfunded Relief Road river crossing link across Breinton, and the associated loss of safeguarded mineral reserves and best and most versatile agricultural land which would arise from the construction of such a road, indicate that this Relief Road link, even if in the Core Strategy, may never come to pass. Major reservations about this road were recorded by the Planning Inspector in her Report on her Examination of the Core Strategy.
3. We welcome Policies B9 (designated local green space) and B11 (green infrastructure) and B15 (local distinctiveness) because the environmental richness and diversity of Breinton are very special. In the course of time, they will be found to be even more special as full analyses of the area have yet to be undertaken. It is encouraging that some Breinton residents have started a History Group dedicated to finding out and recording more about Breinton's past. Others have undertaken wildlife studies such as bat surveys, beetle and great crested newt searches, badger watching, rare wild flower documenting and similar, and have reported these to the County's Biological Records Centre. Breinton's environmental and heritage assets add to its community values. They are appreciated by so many who use its paths and bridle ways, a short distance from the City, and come back time and again. The Breinton Neighbourhood Plan protects and serves all of the above.

Please acknowledge Receipt

Yours, with thanks, Vicki Wegg-Prosser

Date : 13 April 2016

Latham, James

From: Paul Smith Associates <paulsmithplanning@outlook.com>
Sent: 19 April 2016 15:44
To: Neighbourhood Planning Team
Subject: Breinton NDP Regulation 16
Attachments: Wyevale Nurseries Reps on the BNDP January 2016 version 2.docx

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sirs,

Breinton NDP Regulation 16 Draft

Please see attached objections to the draft NDP submitted on behalf of Wyevale Holdings Ltd.

Please acknowledge receipt.

Thank you.

Yours sincerely

Paul Smith MRTPI

Representations on the Breinton Neighbourhood Development Plan Regulation 16 Re-Submission Draft on behalf of Wyevale Holdings

Introduction

Wyevale Holdings have the following representations to make on the Breinton Neighbourhood Development Plan Regulation 16 Draft (BNDP). These representations should be read in conjunction with those previously submitted by Wyevale Holdings on the previous draft version of the BNDP (see copy attached). Many of the previous representations made by Wyevale Holdings have not been responded to current draft of the BNDP and therefore they remain relevant.

National Planning Policy

National planning policy relating to the formulation of Neighbourhood Plans is provided in paragraphs 183 to 185 inclusive of the National Planning Policy Framework (the Framework).

Paragraph 184 of the Framework requires Neighbourhood Plans (NP) to be in *general conformity* with the strategic policies of the Local Plan which in this instance comprises the Herefordshire Core Strategy (HCS) adopted by Herefordshire Council in October 2015.

NPs should *plan positively* to support those policies and should *not promote less development* than set out in the Local Plan or undermine its strategic policies. Paragraph 185 states that once a NP has demonstrated its general conformity with the Local Plan and is brought into force its policies take precedence over non-strategic policies in the Local Plan for that neighbourhood.

Given the significance of the BNDP once it is brought into force, it is imperative that its draft policies are thoroughly scrutinised to ensure that, amongst other things, they would be in general conformity with the Framework and Core Strategy strategic policies and do not promote less development.

Reference is made to other relevant policies of the Framework in these representations.

Representations

These representations are presented under the following headings:

- (i) environmental constraints on development in the Parish;
- (ii) Policy B18;
- (iii) Policies B1 and B2 and;
- (iv) Omission of Potential Development Site

(i) Environmental Constraints on Development in the Parish

A key characteristic of the Parish rightly identified in the BNDP is that it comprises generally a 'valued' landscape on the urban fringe. Its high quality rural character and appearance is reinforced by a network of environmental and historic designations distributed throughout the Parish.

The BNDP also identifies a high number of 'key public views' within the Parish. However, the northern reaches of the Parish along the Kings Acre Road and the A480 are far less affected by these designations and none of these key public views look upon land within the Parish to the north of Kings Acre Road. The BNDP identifies the Kings Acre Road area as possessing a distinctively different, more suburban character and appearance than the main body of the Parish. Consequently, this area will be relatively less sensitive to further development than the main body of the Parish.

In addition, the BNDP identifies the Parish in the main as being poorly served by community facilities and bus services. In contrast, the Kings Acre Road area is well served by regular bus services to reach facilities and services found in the city. The Kings Acre area is also served by a developing cycleway network and lies within easy walking distance of the Stretton Sugwas Primary School and the Parish's only employment site, The Wyevale Business Park.

By any objective analysis, the Kings Acre Road area is a far more sustainable location for new development both environmentally and in terms of accessibility than the main body of the Parish.

On page 11, Figure 2 – Settlement Pattern Analysis: has an entry of "bus stop" under "Kings Acre Road" which does not recognise a second bus stop on the A480 in the locality of its junction with Wyevale Business Park. Thus, the BNDP underplays the high degree of accessibility by public transport to the northernmost sector of the Parish and the wide disparity between the sustainability credentials of the King Acre Road area and the Parish as a whole.

(ii) Policy B18

The BNDP recognises the significance of the Wyevale Business Park (not the Veldifer Employment Area as referred to in the BNDP).

Wyevale Holdings supports the thrust of Policy B18 'Veldifer' in its support for employment development. However, the definition of the 'Veldifer Employment Site' on Figure 21 is incomplete and unjustified. It omits land to the north of the cross-hatched area which lies within the Parish and is used for employment and ancillary purposes to the same extent as those areas included within the employment area. No justification is provided in the BNDP as to how this boundary was drawn or why this northern area was excluded.

(iii) Policies B1 and B2

The housing strategy and policies of the BNDP contain contradictions and serious omissions, are unsupported by a robust methodology and would fail to achieve the wider objectives of the BNDP.

Policy B1 'Housing Development in the Defined Breinton Settlements' permits housing within and adjoining the two settlements of Lower Breinton and Breinton Common. This criterion is consistent with Policy RA2 of the CS yet provides no explanation why other locations in the Parish have been excluded and are to be treated as open countryside in policy terms.

Without an explicit and objective consideration of all alternative locations for new housing being made, it is not possible to conclude that the BNDP has struck the appropriate balance between protecting the Parish environment and meeting fully requirements of the CS. The BNDP justification for its strategy is that "...opportunities for development in the rural area ...are limited" (Page 58). This is not the case having regard to the Wyevale Holding site (for details – see attached). Consequently, the analysis underpinning the housing strategy of the BNDP is not robust and arrives at a sub-optimum strategy.

The two settlements chosen are amongst the most environmentally sensitive areas of the Parish as recognised in the BNDP. Lower Breinton consists of listed buildings with extensive protected settings in particular the village church. The BNDP proposes to designate much of the centre of Lower Breinton as a 'Local Green Space' (see page 75, Figure 20b) the objectives of which are fundamentally at odds with its inclusion under Policy B1. Therefore, given these severe environmental constraints upon development, the level of new housing under B1 would likely be very limited and less than assumed in the BNDP.

Notwithstanding this, Policy B1 permits development 'adjoining' these settlements with no limit on the scale of housing permissible. This policy would either fail to achieve objectives of the BNDP to protect the rural character of the Parish, would fail to contribute to the required number of

housing or be of sufficient scale to secure the delivery of affordable housing and developer contributions to community facilities required under the CS.

By selecting two specific locations for housing in the most environmentally and historically sensitive locations in the Parish would fail to achieve the objectives of the BNDP.

These failures of Policy B1 as drafted stem from the poor choice of location of potential housing sites the characteristics of which would either severely limit the scope for more housing or would result in significant environmental harm.

Wyevale Holdings considers that Policy B1 should be widened in scope to include other parcels of land which are less environmentally sensitive, can accommodate development to meet required housing requirements of the Parish and are of a scale to secure community benefits. One of these additional areas of land should be the Wyevale Holdings site north of the Kings Acre Road previously promoted in the BNDP.

Policy B2 'Kings Acre Road' supports housing "within the area of Kings Acre Road" as defined in Figure 19, page 61. In contrast to Policy B1, new housing on a site 'adjoining' this area would not be permitted.

No robust justification is given in the BNDP as to why housing under Policy B2 should be more strictly controlled than under Policy B1. This is despite the fact, as recognised in the BNDP, the Kings Acre Road area being the most accessible and developed area of the Parish in a less environmentally sensitive location than the main body of the Parish. This strategy is illogical.

The Background text of this policy states that Kings Acre is not a settlement under Policy RA2 of the CS. Whilst this statement is correct, the BNDP fails to mention that neither Lower Breinton nor Breinton Common (to which Policy B1 refers exclusively) are also omitted from Policy RA2. CS Policy RA2 refers to 'Breinton' meaning the Parish as a whole and therefore Kings Acre Road is as legitimate a location for new housing in the Parish as the two settlements referred to under Policy B1 of the BNDP. The lack of a justification of the BNDP to demonstrate a robust methodology behind Policy B2 as drafted is a serious flaw of the draft document.

Indeed, Core Planning Principles of the Framework are that the allocation of land for development should prefer land of lesser environmental value (paragraph 17, seventh bullet), the encouragement of reusing land that has been previously developed (eighth bullet point) and to actively manage patterns of growth to make the fullest possible use of public transport (eleventh bullet point). Some of these core principles are espoused in the BNDP.

The Kings Acre Road area is the most appropriate area of the Parish to accommodate housing growth. The only public transport and cycleway corridors in the Parish pass along the Kings Acre Road/A480 area which lies closest to existing employment sites and the future employment site of the Three Elms strategic development site.

Therefore, it is wholly inconsistent and unjustified for the BNDP to restrict housing development in the Kings Acre Road area to any greater degree than the far less sustainable locations of Lower Breinton and Breinton Common. Further, Policy B2 would contradict Policy RA2 of the CS in that it would permit housing only *within* the Kings Acre Road area not *adjoining* it.

The BNDP should be amended to allow housing development on sites adjoining the Kings Acre Road area as defined in the BNDP.

(iv) Omission of Consideration of Potential Development Site

These serious shortcomings of Policies B1 and B2 (see comments above) are compounded by the omission in the BNDP to include a potential housing site in the ownership of Wyevale Holdings previously drawn to the attention of authors of the BNDP.

This site is currently the subject of a planning proposal for the erection of up to 73 houses. In its earlier representations on the BNDP (see attached), Wyevale Holdings an alternative housing strategy to that proposed the allocation of this land for housing to meet all the needs of the Parish. However, no mention is made in the BNDP to this alternative strategy or why it was rejected. This potential housing site would lie in a sustainable location, closest to the employment site and includes previously developed land. Its development would not breach any specific or general constraints to development identified by the BNDP. An objective analysis would conclude that the development of the site would represent a more sustainable means of achieving the objectives of the Core Strategy than the BNDP in its current form.

The failure of the BNDP to adopt and even respond to the promotion of this alternative strategy, or the widening of the scope of Policies B1 or B2 to include development on this site seriously undermines the robustness of its housing strategy.

Conclusions

Wyevale Holdings support some aspects of the BNDP. It supports the proactive approach of Policy B18 adopted toward employment development on the Wyevale Business Centre – or ‘Veldifer Employment Area’ as it is referred to in the BNDP. However, the definition of this area is too tightly drawn and should be expanded to the north.

Wyevale Holdings also supports the objective of the BNDP to meet fully Parish housing requirements. However, the resultant draft housing policies are inconsistent with each other, the Framework and Core Strategy. They fail to achieve the objectives of the BNDP in terms of sustainable development, environmental protection and the provision of community benefits.

The failure of the BNDP to respond in any way to the representations of Wyevale Holdings with regard to its promotion of an alternative housing strategy of allocating its site in the Kings Acre Road area represents a serious flaw in the BNDP.

Wyevale Holdings **objects** to the BNDP as drafted and considers that the Neighbourhood Plan should be amended in line with its representations.

Attachment

Representations on the Draft Breinton Neighbourhood Development Plan on behalf of Wyevale Holdings

Introduction

Wyevale Holdings have the following representations to make on the Breinton Neighbourhood Development Plan (BNDP).

Wyevale Holdings is an important and well-established local company employing up to 200 people. It owns extensive areas of land on both sides of the Kings Acre Road and the majority of Wyevale Business Park (referred to in the BNDP as the 'Veldifer Employment Site'). As the BNDP acknowledges, the Wyevale Business Park is the main employment site within the Parish. The company also owns land at Kings Acre Halt which lies between Kings Acre Road and the A480.

National Planning Policy

National planning policy relating to the formulation of Neighbourhood Plans is provided in paragraphs 183 to 185 inclusive of the National Planning Policy Framework (the Framework).

Paragraph 184 of the Framework requires Neighbourhood Plans to be in *general conformity* with the strategic policies of the Local Plan. Neighbourhood Plans should *plan positively* to support those policies. Crucially, Neighbourhood Plans should *not promote less development* than set out in the Local Plan or undermine its strategic policies. Paragraph 185 states that once a Neighbourhood Plan has demonstrated its general conformity with the Local Plan and is brought into force its policies take precedence over non-strategic policies in the Local Plan for that neighbourhood. Given the significance of the BNDP once it is brought into force, it is imperative that its draft policies are thoroughly scrutinised to ensure that, amongst other things, they would be in general conformity with Local Plan strategic policies and do not promote less development.

At the time of writing, the Planning Inspector's report on the Herefordshire Core Strategy, as modified, is awaited. Until this report is published it is not possible to establish with any degree of certainty

whether or not the BNDP reflects the strategic policies of the adopted Core Strategy.

Representations

These representations are presented under the following headings:

- (i) environmental constraints on development in the Parish;
- (ii) employment policies relating to Wyevale Business Park and;
- (iii) proposed housing policies.

(v) Environmental Constraints on Development in the Parish

A key characteristic of the Parish identified in the BNDP is that it comprises mainly a ‘valued’ landscape on the urban fringe. Its high quality rural character and appearance is reinforced by a network of environmental and historic designations reasonably well distributed throughout the Parish.

The BNDP also identifies a high number of ‘key public views’ evenly distributed throughout the Parish. In contrast, the northern reaches of the Parish along the Kings Acre Road and the A480 are far less affected by these designations and none of these key public views look upon land within the Parish to the north of Kings Acre Road.

The BNDP identifies the Kings Acre Road area as possessing a distinctively different more suburban character and appearance than the main body of the Parish. Consequently, this area will be less sensitive to further development.

In addition, the BNDP identifies the Parish in the main as being poorly served by community facilities and bus services. In contrast, the Kings Acre Road area is well served by a regular bus service to reach facilities and services found in the city. This area is also served by a developing cycleway and lies within easy walking distance of the Stretton Sugwas Primary School.

Therefore, compared to the main body of the Parish, the Kings Acre Road area is a far more sustainable location for new development both environmentally and in terms of accessibility.

(vi) Employment Policies Relating to Wyevale Business Park

Wyevale Holdings owns the majority of Wyevale Business Park as well as extensive tracts of land under horticultural cultivation within and beyond the Parish.

Wyevale Holdings welcomes the recognition given in the BNDP to the importance of this business park. In particular, support is given wholeheartedly to the thrust of draft Policy B7 which aims to preserve the existing commercial use of this employment site. However, the scope of this policy should be widened to facilitate the enlargement of this site subject to detailed criteria.

(vii) Proposed Housing Policies

The BNDP calculates that only a further 10 new houses need be erected in the Parish up to 2031. It is argued that such a low number of additional houses justify the 'criteria-based' approach of draft Policy B1. The BNDP rightly acknowledges that housing in the Parish needs to grow by a minimum of 18% in accordance with the emerging Core Strategy. However, it incorrectly takes into account only 191 dwellings in the Parish ignoring the high number of further houses in the Kings Acre Road area.

The justification provided in the BNDP for this approach is unsound and unjustifiably selective for the following reasons:

- As a matter of fact, the Kings Acre Road area lies within Breinton Parish. The suggestion that housing development in this area is untypical of the character and appearance of the majority of the Parish is not a reason for the Parish to be relieved of its responsibility of achieving proportionate growth. Without meeting its minimum growth targets set out in the Core Strategy, the BNDP would fail to accord with strategic planning policies.
- The unjustified minimising of the number of new houses in the Parish contradicts the spatial strategy of the emerging Core Strategy which emphasises proportionate growth in the Hereford Housing Market Area over more rural areas. This would entail the BNDP promoting less development than strategic policies of the Core Strategy contrary to paragraph 184 of the Framework.

- The BNDP includes in its calculations a commitment to the erection of new dwellings mainly in the Kings Acre Road area whilst ignoring that same area in calculating its housing growth under policies of the emerging Core Strategy.
- If the BNDP is to achieve sustainable development it would be unsound to ignore the Kings Acre Road area when that area comprises the least visually sensitive and most sustainably accessible sector of the Parish.
- It is inconsistent to recognise the importance of Wyevale Business Park as an employment site in the Parish and then ignore the housing that exists in the same area.
- There is no policy justification in the Core Strategy for the Parish to meet only one-half of its minimum required housing growth.

As an alternative to the approach adopted in the BNDP, a far more sound approach is to use the number of *all* existing houses in the Parish as the base for calculating the number of new houses to be erected during the plan period of the Core Strategy. On this basis, an 18% increase in housing numbers would equate to an additional 72 dwellings in the Parish (that is: 401 dwellings x 18%) and not 10 houses as promoted in the BNDP.

Further, Breinton Parish borders the city and lies in a more accessible location in relation to a full range of community facilities and services, public transport and employment opportunities than most rural parishes in the Hereford Housing Market Area. For this reason, it is justified for the Parish to accommodate in excess of 72 dwellings up to 2031. The Core Strategy policy of an 18% increase in the housing growth in the Parish is a minimum requirement.

Conclusions

The BNDP underestimates considerably the number of new houses it should accommodate in accordance with policies of the emerging Core Strategy. A minimum increase of 72 dwellings and possibly more, calls for an allocation of housing land in the Parish rather than the use of ‘criteria-based’ draft Policy B1.

An allocation of a specific area for housing would have the following advantages:

- It would provide more certainty over the number of new houses to be built in the Parish compared to draft Policy B1.
- It would better achieve sustainable development than the alternative ‘ad hoc’ submission of small-sized housing schemes envisaged under draft Policy B1; and
- It would better achieve community benefits from development. For example: the small housing schemes as envisaged under draft Policy B1 would be less likely to include an affordable housing component.

A field at Kings Acre Halt, between Kings Acre Road and the A480, is owned by Wyevale Holdings (see attached for the site location plan). It was the subject of an outline planning application earlier this year for the erection of up to 73 houses (Council reference: 142985). Planning permission was refused by Herefordshire Council principally on the grounds that it might prejudice the planning of the proposed Western Relief Road. However, no planning objections were raised by the Council to the environmental effect, location, drainage or highway implications of this proposal. Clearly, this site can accommodate new housing without environmental harm being caused to its surroundings.

The allocation of the Wyevale Holdings site at Kings Acre Halt for housing in the BNDP would provide a sufficient number of new houses to meet the appropriate level of housing growth in the Parish, in a sustainable location and in an environmentally-acceptable way. Further, the allocation of this site for housing would protect the remainder of the Parish from new housing up to the year 2031 and would meet fully the objectives of the Breinton Neighbourhood Development Plan.

Accordingly, Wyevale Holdings considers that the Neighbourhood Plan should be amended in line with its representations.

