

Belmont Rural Neighbourhood Plan Examination
Request for further information and questions from the Examiner to the Parish Council and HC

Having completed my initial review of the Neighbourhood Plan (the Plan) and the evidence submitted in support of it, I would be grateful if both Councils could kindly assist me as appropriate in answering the following questions which either relate to matters of fact or are areas in which I seek clarification or request further information.

Queries requesting further information and clarification

1. I am mindful that the Parish has not got any ‘target’ for housing numbers, but it is important to ensure that the Parish contributes to the housing need identified for Hereford. Given the range and coverage of policies in the Plan, including in particular Policies 1, 2 (which could be regarded as potentially restricting housing supply) and 5 (which supports infill development), please could HC confirm whether they are satisfied (or not) that the Plan and its approach will generally conform to the strategic policies in the development plan in relation to housing requirements.

Response from Herefordshire Council

With regards to Policy 1, the areas identified as protected open spaces are those which have previously been identified in the UDP and South Herefordshire Plans as part of the Belmont estate development. Therefore the areas have a sound basis for designation. The only additional suggestion would be whether there should be a cross reference within Policy 1 to CS policy OS3 which does allow development on open space in specific circumstances.

In respect of Policy 2 however this does not seem so logical. It would have been better for the plan to set out a settlement boundary with this area excluded rather than in effect include an area of largely countryside area and then protect it from development by a policy.

The Council will be looking to define a settlement boundary for Hereford in the Hereford Area Plan. Belmont Rural is included within the Hereford Area Plan boundary.

So in housing land supply terms, it would be more appropriate to define a settlement boundary incorporating the “urban” edge of Belmont and then identify the matters that would be need to be addressed should proposals be advanced beyond that boundary (such as those identified by the inspector at the Home Farm appeal).

In respect of the wording of policy 5, the wording could be more positive in respect of encouraging new housing on sites within the plan area, as not sure of the value of the first bullet point which does seem to restrict “infill” housing to a specific group of sites.

2. Leading on from this, Policy 2 seeks to protect Home Farm and land adjacent to Ruckhall Lane shown on Figure 10 from any development that would have a detrimental impact on its open character and the setting of heritage assets. Three questions arise:

- a. This area coincides with an indicative route of the Relief Road shown in Figure 12 of the Plan. Please could HC update me on the latest position with the proposal and state whether it is considered that Policy 2 is in general conformity (or not) with the strategic policies of the development plan in this regard? In particular I am keen to ensure that the wording and thrust of Policy 2 would not (however inadvertently) prevent the Relief Road proposal from being implemented.

Response for Herefordshire Council

There is currently a 6 week consultation being undertaken upon the Hereford Transport Package. This includes the western bypass. A link has been included to the exhibition material.

With respect to the potential impact upon the relief road, the wording of policy 2 could, even if only inadvertently, make the implementation of this key strategic proposal more difficult. The early suggestion regarding a settlement boundary (as set out above) could resolve this or alternatively a stronger statement inserted within the policy to recognise that this policy will not prejudice the implementation of the Hereford Relief Road rather than "having regard" to the relevant CS policies.

- b. The supporting text refers to the area as an 'unregistered park'. Please could more details be given to me about the status/designation of, and information about, this area.

Response from Herefordshire Council

Copy of a map for the unregistered park and garden is attached.



Belmont_Rural_Unreg
_P&G.pdf

The Belmont House park and garden is not included within the national Register of Parks and Gardens but was identified by the Council together with the Herefordshire and Worcester Gardens Trust as an unregistered park and garden of local importance.

It is included within the Herefordshire monuments records (link included) as SMR 31136.

http://htt.herefordshire.gov.uk/her-search/monuments-search/search/monument?smr_no=31136&s=Start+search

Therefore it forms a non-designated heritage asset with regards to paragraph 135 of the NPPF.

- c. Please could a copy of the appeal decision (or link to it) for Home Farm be provided to me?

Response from Herefordshire Council



Home Farm appeal
decision.pdf

Copy of the appeal decision is attached

3. Policy 3, the Belmont Golf Course, supports housing, B1 or leisure uses on an area defined in Figures 5 and 11 as long as the existing buildings are reused and converted. A number of queries arise:
- Are the existing buildings or any part of the land referred to in Policy 3 heritage assets? If so, please provide details.
 - Have any assessments been done (by the PC or anyone else) of the potential to convert the existing buildings or of their character and any historic or other contribution they may make to the local area? In other words what is the supporting information/evidence and rationale for Policy 3?
 - How and on what basis has the area subject to the policy and shown on Figure 11 been defined?
 - Has the landowner or their representatives been involved in any discussions and the development of this policy?
 - A representation from Savills, on behalf of the landowner, indicates, amongst other things, their view that the policy is “overly restrictive, unjustified and has not taken account of the existing internal layout, condition or viability of the re-use”. Savills also refer to previous contact with Historic England and the need for enabling development. My earlier question relates to the basis on which this policy has been predicated. I consider it would be useful for HC to write to Savills to ask for further information and evidence in relation to the viability points they make in their representation objecting to Policy 3. I am keen to ensure that Policy 3 does not, however inadvertently, prevent the achievement of sustainable development.

Response from Belmont Rural Parish Council

- a) Yes, Belmont House which is Grade II* which is referenced in paragraph 5.8, 1.10 and also listed in Appendix A.

For further clarification please find attached map from Historic England listing description and another map which was prepared for the NDP which can be



Belmonthouse_HEma p.pdf A4LParishMapV3.pdf

put into the Appendix.

- b) No site or building assessments/surveys have been carried out as part of the NDP process. Belmont House is a heritage asset within the NDP area and of importance to the local community.
- c) Home Farm boundary to the south Northern Boundary are Flood Zones 2 and 3 and River Wye Special Area of Conservation
- d) Notified as part of the various stages in consultation, refer to the Consultation Statement.

Response from Savills

e) On behalf of our client, please find attached;

- Our response letter
- 3 supporting plans
 - Plan 1 – Belmont Rural NDP Policy 3 Proposed Site – Constraints Plan
 - Plan 2 – Belmont Rural NDP Policy 3 Proposed Site – Developable Area
 - Plan 3 – Wider Belmont Rural Development Opportunity Plan
- A letter from English Heritage (2008)



FINAL Examiner



PLAN 1- Belmont



PLAN 2 - Belmont



PLAN 3 - Wider



English Heritage

Query Response.pdf Rural NDP Policy 3 PrRural NeighbourhoodBelmont Rural Develo 2008 Enabling Develo

Queries of clarification

4. Is there some missing text at the end of paragraph 5.14 on page 22 of the Plan? If so, please provide the text.

Response from Belmont Rural Parish Council

'Smaller initiatives such as enhancement to footpaths and cycle ways are of equal importance. This can be achieved by working with Herefordshire Council and organisations such as Sustrans.'

5. Policy 1 criterion b) seeks the designation of four areas of Local Green Space (LGS). These are shown on Figure 9. Yet Figure 8 refers to five such areas. Please clarify; for instance is Area 5 included within Area 2 on the map?

Response from Belmont Rural Parish Council

There are 5 areas (Jubilee Field, Abbey View East, Abbey View West, Coppin Rise play area, Northolme Play Area) seeking LGS designation. Site 5 listed on figure 8 falls within Site 2 Abbey View East.

6. If possible, please provide a map indicating the location of the Local Wildlife Sites referred to in criterion d) of Policy 1 or direct me to where I might access this information.

Response from Belmont Rural Parish Council

The following information is taken from Herefordshire.gov.uk - Wildlife sites
There are 685 Local Wildlife Sites (formerly known as Special Wildlife Sites and Sites of Importance to Nature Conservation) in Herefordshire.

For information about a specific wildlife site in the county, please contact Herefordshire Biological Records Centre.

Please note: some data is sensitive and about protected species so we may not be able to provide the information. Depending on the request, we may also charge for the service.

Herefordshire Biological Records Centre

Herefordshire Biological Records Centre, Fir Tree Lane, Rotherwas, Hereford
HR2 6LA Tel: 01432 261538

Response by Herefordshire Council



Belmont_Rural_LWS.p
df

A map has been attached

7. Policy 1 criterion e) refers to Herefordshire's Playing Pitch Assessment 2012, but this is not mentioned elsewhere in the Plan. I can see that this was included after a comment from Sport England at the pre-submission stage, but please could you briefly explain the relevance and status of this document and the intention of criterion e)?

Response from Belmont Rural Parish Council

The Herefordshire Playing Pitch Assessment 2012 (produced and adopted by HC) is made up of a strategic overview document and then a series of 'area' assessments covering the County. Belmont rural falling with the 'Hereford Area', sub-section Hereford City South (with the wards of St Martins & Hinton).

As the document itself states in the Introduction (page 3, para 1.1.1 of the Strategic Overview document);

'purpose of this study is to produce a strategic framework, audit and assessment and needs analysis of outdoor sports pitches and facilities for Herefordshire'.

The document also refers to the Localism Bill and importance of the community in having more control of their own areas/services which relates to the aspirations of the Belmont Rural NDP;

In support of developing "local services", the Council is looking to lessen the burden on diminishing resources through Community Asset Transfers. This approach is supported by Sport England and recommendations identified in the Playing Pitch Strategy will help to identify those communities where this may be possible for outdoor sports facilities. (page 4, para 1.1.5 of the Strategic Overview document)

The site searches and analysis carried out as part of the assessment by HC were considered to be of relevant to the preparation of the NDP and it was considered important in support of Policy 1, part e) to cross reference the Strategy and its main recommendations which can be found on pages 103-108 of the Hereford Area Assessment which details site specifics and generic recommendations.

Response from Herefordshire Council

The Playing Pitch Assessment 2012 is an evidence base document for the Core Strategy. A link has been included, https://www.herefordshire.gov.uk/directory_record/2102/playing_pitch_assessment_2012

8. Policy 5 criterion c) refers to garden areas and parking being provided "within the boundary of the existing property". Was it intended to mean that gardens and parking would be provided within the curtilage of the new house(s) built? If not, please clarify what the intention was.

Response from Belmont Rural Parish Council

Yes, that adequate parking and useable garden space could be provided within the curtilage area. This is to try and alleviate problems associated with on street parking which can result in over development of a site where there is inadequate

parking provided and therefore an increasing number of parked cars forced onto the streets.

9. The Hereford Area Plan is referred to on page 41 of the Plan. Please update me on the latest position and whether the reference to the Area Plan is still relevant and appropriate for inclusion in this Plan.

Response from Herefordshire Council

The Hereford Area Plan is current undertaking an Issues and Options consultation. Belmont Rural is included within the Hereford Area Plan boundary given its relationship with the built form of Hereford. It is intended that the policies of the HAP will be complimentary to that of the Belmont NDP.

10. The Basic Conditions Statement (page 11) indicates that Table 3 sets out the way Plan policies conform to the pre-submission version of the Herefordshire Local Plan Core Strategy (CS), but an earlier paragraph recognises the CS was adopted. Please confirm whether (or not) Table 3 relates to the adopted CS.

Response from Belmont Rural Parish Council

Yes, the Basic Condition Statement relates to the adopted CS. The words 'from the pre-submission publication' should have been removed.

11. Was the Strategic Environmental Assessment Screening Opinion consulted upon? If so, please give me details about the consultation and its dates.

Response from Herefordshire Council

The Scoping Report was consulted upon between the 8 September and the 13 October 2014.

Four bodies were consulted; Natural England, English Heritage, Environment Agency and Natural Resources Wales.

Natural England and English Heritage responded. Copies of their responses have been included for reference



Fourth tranche of SEA
Scoping consultations



131492 Belmont
Rural NP SEA Scoping

12. The Environmental Report refers to a response from the Environment Agency at paragraph 2.10, page 5 as well as referring to a different neighbourhood plan. I have assumed these comments are made in error; is that correct?

Response from Herefordshire Council

The reference to Wellington NDP within the Environmental Report is an error

The reference to the Environment Agency is also in error. They were consulted on the Draft Environmental report but only responses from Natural England and English Heritage/Heritage England were received.

It may be the case that on receipt of your anticipated assistance on these matters that I may need to ask for further clarification or that further queries will occur as the examination progresses. Please note that this list of questions and request for information is a public document and the answers and any associated documents will also be in the public domain. Both my questions and the responses should be placed on the Councils' websites as appropriate.

With many thanks.


Ann Skippers
5 April 2017

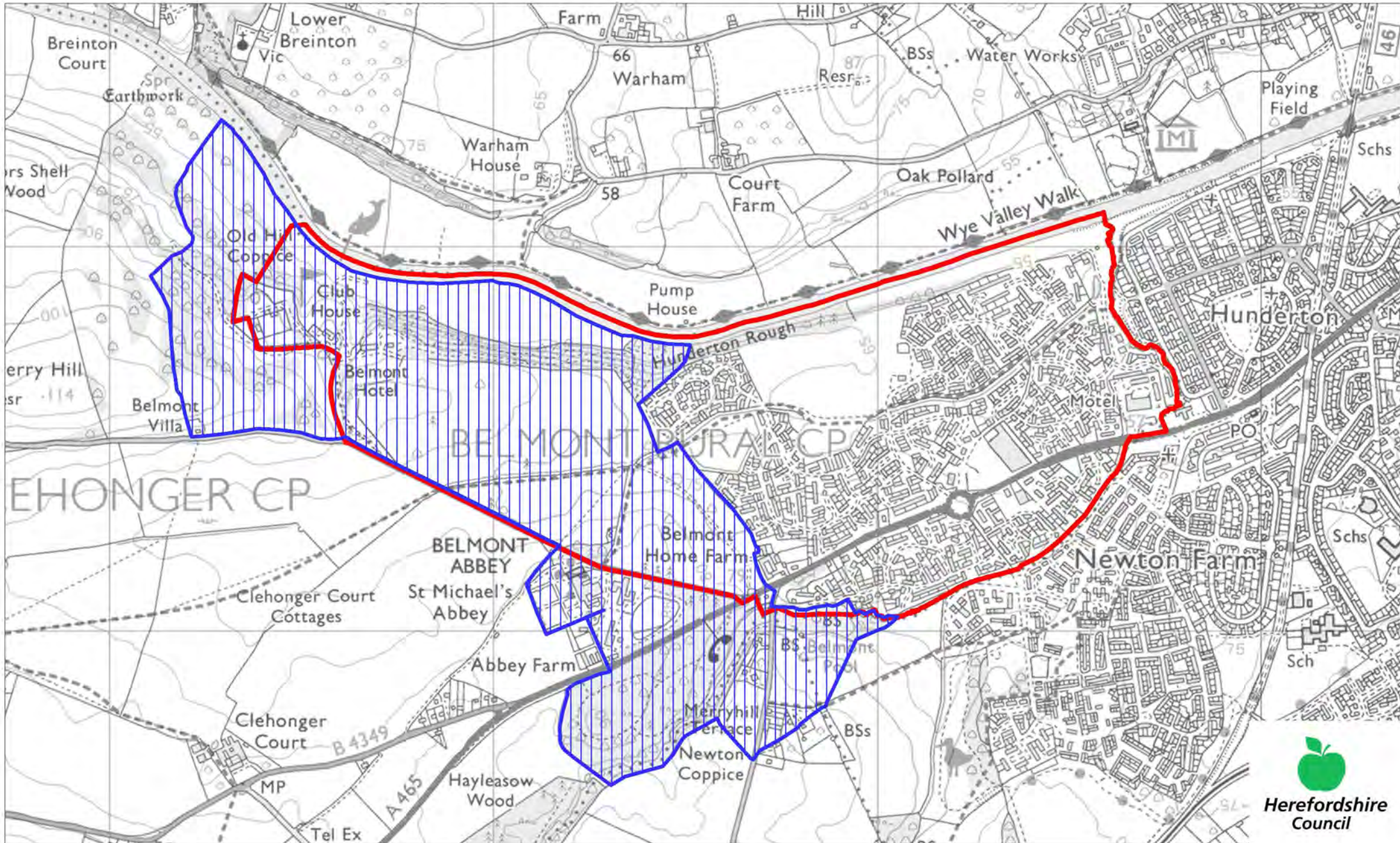
Not to scale



Local Wildlife Sites in and around Belmont Rural Neighbourhood Area

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 Belmont House
Unregistered Park and Garden



Appeal Decision

Inquiry sitting days 12-15 November 2013

Site visit made on 11 November 2013

by Neil Pope BA (HONS) MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 10 January 2014

Appeal Ref: APP/W1850/A/13/2192461

Home Farm, Belmont, Hereford, HR2 9RX.

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Lioncourt Homes (Development No.10) Limited against the decision of Herefordshire Council.
 - The application Ref. S122747/O, dated 27/9/12, was refused by notice dated 27/12/12.
 - The development proposed is residential development of up to 85 dwellings with access, associated open space, landscaping, infrastructure and parking provision.
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Decision

1. The appeal is dismissed.

Preliminary Matters

2. With the exception of the means of access, all other matters of detail have been reserved for subsequent consideration.
3. Both main parties informed me that the access details that were considered by the Council in December 2012 are those shown on drawing ref. 736-02. This forms Appendix C of the appellant's Transport Assessment (TA) dated September 2012. These details include a 2 metre wide footway immediately along the edge of Ruckhall Lane (C1199) and a visibility splay to the west measuring 2.4m x 210m. (The illustrative masterplan considered by the Council [drawing ref. Bir.3493_10-H1] shows a 2m wide "off-road" footpath.)
4. Within an e-mail dated 3 April 2013, the Council confirmed that following the receipt of further information it would not be defending its fifth reason for refusal (archaeology). In a letter dated 18 June 2013, the Council stated that following the submission of additional information it would not be defending its sixth reason for refusal (proximity to a former land fill site).
5. At the Inquiry two planning obligations (under the provisions of section 106 of the above Act) were submitted. The first obligation was an agreement with the Council in respect of the provision of an element of affordable housing and various infrastructure contributions. The Council informed me that this agreement overcame the concerns identified within its seventh reason for refusal. The second obligation was a unilateral undertaking in respect of a landscape and habitat management plan. I return to these provisions below.
6. In October 2013, the Council submitted a supplementary Statement (including appendices). This Statement sets out the Council's change in stance in respect

- of housing land supply (HLS). At the Inquiry the Council argued that it had in excess of a five year HLS.
7. After the submission of the appeal the appellant produced a revised masterplan (drawing ref. BIR.3493_10-N1). This includes alterations to the indicative site layout and some off-site planting. The appellant undertook a process of consultation¹ regarding this revised plan and has forwarded onto me a number of responses from some local residents. The revised plan does not alter the area of the appeal site (the red line plan) or the access details. Layout remains a reserved matter. Having regard to the Wheatcroft² principles, I agree with both main parties that if I were to take this amended illustrative plan into account it would be unlikely to prejudice the case of any party. In so doing, I shall also take into account the representations received from residents.
 8. In July 2013, the appellant submitted a 'Proposed Access Option Plan and Sections' (drawing ref. 736-06 Rev A). This does not alter the position of the proposed access but shows the footway set back from Ruckhall Lane. This footway arrangement is consistent with the above noted illustrative masterplans and has been the subject of consultation with the Council's highways officers. I shall also take it into account in determining the appeal.
 9. The main issue below differs from that which I gave at the opening of the Inquiry. I have amended it having heard all of the evidence and after reading the closing submissions of both main parties³.
 10. During the Inquiry it was stated, on behalf of the appellant, that an application for an award of costs would be made against the Council. It was agreed that this application (together with closing submissions) would be made in writing. This application is the subject of a separate decision.
 11. Following the receipt of closing submissions and the costs application (including various responses) I closed the Inquiry in writing on 18 November 2013.

Main Issue

12. The main issue is whether, having regard to the supply of housing land within the district, the proposals would give rise to any adverse impacts, having particular regard to the likely effects upon the character and appearance of the area, the setting of designated and non-designated heritage assets and nature conservation interests, that would significantly and demonstrably outweigh the benefits of the scheme so as not to contribute to the achievement of sustainable development.

Reasons

Planning Policy

13. The development plan includes the Herefordshire Unitary Development Plan (UDP) which was adopted in 2007. It covered the period up to 2011. The Council accepts that the policies referred to within its decision notice relating to

¹ I was informed that this included newspaper adverts, posting the details on the appellant's website and notifying all those individuals who were originally informed of the application by the Council.

² Bernard Wheatcroft Ltd v SSE [JPL, 1982, P37]

³ This included reference to various judgements, including William Davis Limited and Jelson Limited v Secretary of State for Communities and Local Government ([2013] EWHC 3058 (admin)).

- housing land supply (H1 and H7) are out-of-date and has informed me that these should be given no weight in the determination of this appeal.
14. The most relevant UDP policies to the determination of this appeal are LA2 (landscape character), LA3 (setting of settlements), LA4 (protection of unregistered parks and gardens), NC1 (biodiversity and development), NC6 (biodiversity action plans), NC7 (compensation for loss of biodiversity) and HBA4 (setting of listed buildings). These policies pre-date the National Planning Policy Framework⁴ ('the Framework') and, with the exception of UDP policy NC6 do not contain the 'cost-benefit analysis' that is set out within the Government's planning policies. As a result, there is some 'tension' between most of these local policies and 'the Framework'. Nevertheless, these UDP policies are broadly consistent with sections 11 and 12 of 'the Framework'.
 15. My attention has also been drawn to the emerging Hereford Local Plan Core Strategy (CS). This covers the period 2011-31 and has been subject to some public/stakeholder consultation. However, it has yet to be submitted for Examination and could be subject to change. Neither main party relies on any of the policies or proposals within this Plan and the Council has informed me that the CS is not sufficiently advanced to be given due weight in this appeal. The Council does however rely on some of the evidence base⁵ in support of its arguments. As this underpins policies and proposals that have yet to be independently examined I can only give this evidence limited weight.
 16. In determining this appeal I have also taken into account the provisions of the Council's supplementary planning guidance (SPG) 'Landscape Character Assessment' (2004 and updated in 2009) and the separate SPG 'Biodiversity' (2004). These SPGs have been subject to a process of consultation and can be given moderate weight in this appeal.
 17. In July 2012, the Council adopted, for development control purposes, an Interim Protocol (IP). As set out in the agreed Statement of Common Ground (SoCG), the IP recognised the absence of a five year HLS⁶ within the district and is aimed at ensuring that new housing development is located at sustainable locations. Notwithstanding the above noted change in stance by the Council in respect of HLS, the IP remains extant. The Council informed me that it would be reviewed following the outcome of this appeal. As this IP has not been subject to a process of stakeholder consultation it can only be given very limited weight in this appeal.
 18. The appeal site lies within a designated Neighbourhood Area. However, there is no Neighbourhood Development Plan in existence. I agree with the Council that this designation does not have any bearing upon the merits of this appeal.
 19. In determining this appeal I have taken into account the contents of relevant Written Ministerial Statements⁷, as well as the Government's housing strategy⁸.

⁴ 'The Framework' is a very important material consideration in the determination of the appeal. Paragraph 6 makes it clear that the purpose of the planning system is to contribute towards the achievement of sustainable development and that the policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development means. Paragraph 7 sets out the three dimensions to sustainable development - an economic role, a social role and an environmental role.

⁵ Including the G L Hearn 'Local Housing Requirements Study Final Report: July 2011', the March 2012 'Update to Local Housing Requirement Study', the 'Herefordshire Local Housing Market Assessment 2012 Update: Draft Report' dated January 2013, the Strategic Housing Land Availability Assessment (SHLAA) Second Review 2012, the Urban Fringe Sensitivity Analysis (2009) and the Green Infrastructure Strategy (2010).

⁶ Table 2 of the IP identifies a 4.17 years HLS

⁷ 'Planning for Growth' dated 23 March 2011 and 'Housing and Growth' dated 6 September 2012

Housing Land Supply

20. The appellant's preferred position, using the 2011-based household interim projections⁹, is that there is only 1.75 years HLS¹⁰ within the district. This contrasts with the Council's position, based on the emerging CS requirement¹¹ that 6.9 yrs HLS exists¹².
21. Neither of the housing requirements upon which the main parties rely have, in the context of paragraph 47 of 'the Framework' been objectively assessed. This is a matter to be determined as part of the forthcoming Examination of the CS¹³. In the meantime, proposals must be assessed having regard to the respective arguments concerning the merits of the differing requirements.
22. The housing requirement put forward by the appellant is based upon more up-to-date figures than those considered by the Council in its CS evidence base¹⁴. There is merit to using the 2011 projections as a basis for calculating HLS. However, I am also mindful of the Government's 'localism' agenda and its concerns in respect of targets being imposed upon local communities. In the circumstances therefore, if the Council is unable to demonstrate five years HLS against the emerging CS housing requirement¹⁵ it would be failing to deliver in respect of its own requirements for meeting the market and affordable housing needs of the local community. This would be in conflict with the Government's objective to boost significantly the supply of housing and would lend considerable weight to the appellant's argument for granting permission.
23. There is agreement between the main parties on some aspects of the supply side of the HLS calculation. This includes sites with permissions (including a 10% discount) and UDP allocations (including a 10% discount). However, there is disagreement regarding other aspects, including the emerging CS strategic sites¹⁶. Footnote 11 of 'the Framework' advises that to be deliverable sites should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on site within five years and that development of the site is viable.
24. Sites do not have to have the benefit of planning permission to be deliverable and it is possible to include proposed strategic sites within assessments of HLS. Nevertheless, the examination into the CS has yet to commence and, as I have

⁸ 'Laying the Foundations' (November 2011)

⁹ Produced by the Office for National Statistics (ONS)

¹⁰ The appellant has argued that the housing requirement over the period 2011 to 2031 is 18,474 homes.

¹¹ This proposes a housing requirement of a minimum 16,500 homes between 2011-2031 and is a 'mid-range' figure from the above noted G L Hearn reports which are based on the ONS 2008-based population projections.

¹² The Council's initial proof of evidence dated 25 June 2013, reflects the 4.17 years HLS set out within the IP. Unlike the calculations in its 'rebuttal', the June 2013 assessment was based on the information gathered for the Council's Annual Monitoring Report over the previous 12 months. Whilst it is open to any party to prepare an assessment outside the conventional April-March period the 'rebuttal' does not factor into the HLS calculation the additional housing requirement that follows from rolling forward the assessment outside the AMR period.

¹³ The Council informed me that there were unresolved objections to the CS housing provisions and accepted that these provisions could change as a result of the forthcoming Examination.

¹⁴ This is not a criticism of the Council as new information will always be forthcoming during plan preparation.

¹⁵ This should not be taken as a measure of support for the CS housing requirement which, as I have already noted, has yet to be examined. Moreover, four of the last five years of house completions reveal a shortfall against the housing requirement supporting the appellant's argument that there has been a persistent under delivery of housing and that a buffer of 20% rather than 5% (as argued by the Council) should be applied to the housing requirement.

¹⁶ In total these would amount to 2,240 new homes.

already noted above, the evidence base carries only limited weight¹⁷. The Council's evidence concerning the delivery of these strategic sites includes developers' predictions for the 'build-outs'. However, this information was supplied for the purposes of highway modelling/infrastructure provision. As explained by the appellant's HLS witness¹⁸, such information tends to be optimistic so as to ensure that house building/sales are not held back whilst the necessary highway infrastructure is provided. More significantly, the Council's HLS witness informed me that none of the CS strategic sites were available now. These sites are not therefore 'Footnote 11' compliant and should not have been included within the Council's assessment¹⁹. Removing these sites from the Council's calculations results in less than five years HLS.

25. The Council's assessment of HLS also includes about 1000 homes from the SHLAA sites. The details of these have been interrogated both main parties. I also note that the Council's HLS witness has discussed the 'deliverability' of these sites with the relevant case officers. However, within the SHLAA a number of these sites are not expected to come forward within the next five years and the Council informed me that they would only be available now if they obtained planning permission. This supports the appellant's argument that these sites should also be excluded from a proper assessment of HLS.
26. There is evidence to support the Council's argument that windfall sites have consistently become available in the area. However, as argued by the appellant, this evidence is not robust in respect of the consistency and reliability of large sites. Whilst this element of HLS is also likely to be examined as part of the CS, on the basis of the evidence before me, the full extent of the Council's windfall allowance has not been adequately justified. It would therefore be inappropriate to include the Council's figure within the HLS.
27. My findings above lead me to the view that on the basis of the Council's housing requirement it does not have a five year HLS. If the appellant's requirement is used the deficiency is much greater but would be more than 1.75 years supply. As I have noted above, this weighs considerably in favour of granting permission. Whilst the appellant has argued that the extent of the shortfall adds further weight to the argument for approving the scheme there is no policy support for this. I note from some of the many appeal decisions that have been provided that on occasion the Secretary of State and some Inspectors have taken this approach. However, if the Council had just under a five year supply (which in this instance it does not) it would not diminish the considerable weight which I have attached to the scheme's contribution in reducing the shortfall in HLS. Similar findings were made at Honeybourne²⁰ and Kingstone²¹ which are relied upon by the appellant in support of its case.

¹⁷ It appears that in giving no weight to the policies in the emerging CS but relying on the evidence base the Council may have thought this was akin to the situation regarding the now revoked RSS and the RSS evidence base. However, unlike the emerging CS, the evidence base to the RSS was objectively assessed.

¹⁸ This witness has considerable experience of the house building industry, including assessing housing requirements and supply throughout the country, and is familiar with the development industry's responses to highway modelling. Whilst in no way critical of the Council's HLS witness, who was professional throughout the proceedings, she conceded that she was not an expert on such matters.

¹⁹ They were not included as part of the HLS within the AMR, the IP or the Council's original proof of evidence. There is nothing of substance to support the Council's argument that they should now be taken into account.

²⁰ Paragraph 32 - APP/H1840/A/12/2171339.

²¹ Paragraph 10 - APP/W1850/A/13/2195474.

Character and Appearance

28. The appeal site is situated on the western fringes²² of Hereford. It comprises open parkland²³ with some mature and veteran trees²⁴. This 5.7ha site is bisected by a track²⁵ and is farmed²⁶ in association with Home Farm²⁷. There is a vehicular access²⁸ into the site from the A465 to the south²⁹. A hedgerow³⁰ runs along the south western boundary to Ruckhall Lane with some ancient woodland beyond. The Belmont Abbey complex and some housing lie further to the south west. Part of the site is accessible along public footpaths which link to the public open space and housing to the north and east.
29. The site forms part of the 'Herefordshire Lowlands' national landscape character area (LCA). Historic parks form a key component of this LCA. Within the Council's Landscape Character Assessment SPG this part of the district is identified as having a 'Wooded Estatelands' landscape character type (LCT). The key primary characteristic of this LCT are the large, discrete blocks of woodland. Key secondary characteristics include hedgerows used as field boundaries and large country houses set in parkland and ornamental grounds. I also note from this SPG that this LCT reflects the influence of a limited number of landowners over an extensive area of land. Within the SoCG both main parties have agreed that the site is "*visually relatively well contained.*"
30. Development has previously been permitted³¹ within parts of the unregistered Belmont House Park and Garden. As I have already noted above, there is also housing immediately adjacent to the eastern edge of the parkland. Nevertheless, the appeal site with its unspoilt open qualities, important trees³², established hedgerow³³ along Ruckhall Lane and its agricultural use³⁴ has an unmistakable and very attractive parkland character. Ancient English Oak trees growing in a parkland setting is an alluring feature of the landscape. The site conveys the clear impression of having left the city and entered the surrounding countryside and creates a sense of tranquillity. It makes a significant contribution to the character of the area and is an integral part of this wider parkland setting and the attractive rural surrounds to Hereford.
31. From sections of the public footpaths adjacent to the site, including the footway along the A465, as well as from parts of Ruckhall Lane, the unspoilt open qualities of the site and the veteran trees growing within this area of parkland

²² The rear gardens of houses, including the group of three mid 19th century Grade II listed almshouses and chapel, and a former landfill site (now public open space) abut parts of the northern and eastern boundaries of the site. The hotel and golf course at Belmont House (Grade II* listed) are located to the north west of the site with intervening parkland.

²³ This forms part of the unregistered Belmont House Park and Garden which extends to about 136.5 ha.

²⁴ Some of these trees, which include English Oak, are the subject of a Tree Preservation Order (TPO).

²⁵ This unmade track was created sometime in the mid 19th century and is a former driveway to Belmont House.

²⁶ At the time of my visit the site was being used for sheep grazing.

²⁷ The group of buildings at Home Farm, including a late 18th century Grade II stables, is adjacent to the site.

²⁸ I understand that this access was provided to serve the former landfill site.

²⁹ The Heywood Country Park lies on the opposite side of the A465.

³⁰ Both main parties agree this qualifies as an Important Hedgerow under the Hedgerow Regulations 1997.

³¹ This includes the hotel and golf course adjacent to Belmont House and the housing south of the abbey complex. (This complex includes several listed buildings, including the 19th century Grade II listed monastery buildings and the 19th century Grade II* listed Church of St Michael and All Angels.)

³² Several are identified within the appellant's arboricultural assessment as 'Category A' trees (trees of high quality with an estimated remaining life expectancy of at least 40 years) under BS 5837:2012 'Trees in relation to design, demolition and construction - Recommendations'. I consider these and the 'Category B' trees growing within the site by virtue of their height, form and long-standing relationship with the surrounding pasture land also make a significant and very positive contribution to the landscape qualities of the area.

³³ This provides a continuous 'green corridor' along the lane.

³⁴ I agree with the Council that this farming land use is a vital component of the parkland character.

make a very pleasing contribution to the visual amenities of the area. It is evident from the representations made at application and appeal stage that this part of the countryside is cherished by a number of residents and is likely to add to the amenity value of these parts of the public realm. The evidence before me, including what I saw³⁵ during my site visit, indicates that these are popular paths. The site forms part of a valued landscape³⁶ and the setting to a number of neighbouring listed buildings. This is a sensitive site.

32. The appellant has calculated that the proposed 'development envelope' would extend to an area of 2.8ha (2.2% of the total area of parkland). The illustrative masterplan shows the new housing located towards the central and southern parts of the site. This would avoid building on the higher ground within the site and allow for some new parkland planting, including the reinstatement of parkland trees on land to the west (within the 'blue line' area)³⁷. The landscaping within the site would include the retention of most of the existing trees and the construction of much new hedgerow³⁸. The new houses could be set back from the A465 in an effort to retain green space along this part of the main road and public access would be provided through the site. I recognise that the appellant's designer has given thoughtful consideration to the landscape and visual impacts of the scheme.
33. Whilst in percentage terms the proposal would represent only a very small area of parkland that is not the 'planning test'. However well sited, designed and landscaped, the scheme would comprise a significant incursion of development and an extension of the western limits of the city into a very attractive and valued area of landscape. Although I note the appellant's argument that the scheme would ameliorate the "hard edge" of the existing residential development, the proposed dwellings and their associated paraphernalia, access roads, footways and the considerable increase in activity that would take place in and around the site would have a marked adverse effect upon the character and appearance of the area. The unspoilt open qualities of the site and its tranquillity would be substantially eroded. Moreover, its agricultural character, which is an essential part of this undeveloped area of parkland, would be lost. This would seriously harm the quality of the local environment.
34. Although the new housing could be set back from the trees, the setting of these long-standing landscape features and their splendour would be substantially diminished by the erosion of the open parkland within which they sit. The inclusion of limited areas of green space around some of these trees would be a wholly inadequate substitute for the unfettered expanse of pasture which is integral to their parkland setting and overall amenity value. I also share the Council's concerns that if the scheme was permitted incoming residents, who may at first consider the trees to be of value could, in time, perceive leaf litter, debris and decaying branches to be a nuisance. This could result in pressure being applied on the Council to remove these trees, which it could have difficulty in resisting. It is very far from certain that the proposals would secure the future health and well-being of these important trees.

³⁵ As part of my visit I encountered several people using these footpaths and I noted the well-worn nature of the paths. It is not unreasonable to assume that these paths are likely to be even more popular at weekends.

³⁶ It was accepted on behalf of the appellant that, in the context of paragraph 109 of 'the Framework', the site formed part of a valued landscape.

³⁷ As provided for within the unilateral undertaking.

³⁸ The appellant has calculated that 341m of new hedgerow would be planted.

35. The proposed access works would include the translocation of part of the existing hedgerow along Ruckhall Lane. Even if the translocated hedgerow survived the rigours of these works the loss of hedgerow and the gap created for the new road (including visibility splays) would disrupt the continuity of this important landscape feature. These works and the proposed new housing would introduce a suburban element along this lane and upset the existing pattern of field boundaries. This would greatly detract from its predominantly rural character and the setting of the retained parkland to the west.
36. When seen from the public realm, the proposed development would comprise an unwelcome encroachment into the parkland which abuts the existing built-up limits of the settlement. The houses, roads and footpaths would considerably detract from the rural setting of this part of Hereford. For most users of the adjacent public rights of way the proposal would be likely to reduce the amenity of these countryside paths.
37. The proposals would seriously harm key/important characteristics of the local landscape and considerably diminish the integrity of the parkland. It would also markedly detract from the largely unspoilt appearance and amenity of the area. This weighs very heavily against granting permission.
38. The reinstatement of parkland planting to the west of the site would provide potential future veteran trees and be of some limited benefit to the character and appearance of the area. However, neither this, nor the other suggested landscape planting would mitigate the environmental harm that I have identified above. The proposed public access through the site would also fail to 'compensate' for the loss of amenity that would ensue along sections of the existing footpaths. In any event, access through the site would be necessary to ensure that the development was adequately linked to neighbouring land uses and integrated within the existing urban fabric.
39. Whilst I note the proposals for the Hereford Relief Road the actual route has yet to be determined and the necessary funding secured. It is very far from certain that this road would bisect the parkland. Even if it did, the implications for the remainder of the parkland have not been established. This proposal does not add weight to the argument for allowing this appeal.
40. The Council and some residents have raised precedent as an issue. However, each case must be determined on its own merits and there is no evidence to support fears that the remainder of the parkland or any other parkland within the district is subject to pressure for similar development. There is nothing of substance to justify withholding permission on the basis of precedent. I note that this matter did not form part of the Council's reasons for refusal.
41. Given the above, the proposal would conflict with UDP policies LA2 and LA3 and would be at odds with the provisions of 'the Framework' which are aimed at protecting and enhancing valued landscapes.

Setting of Heritage Assets

42. The appeal site forms part of the setting of the above noted Grade II and Grade II* listed buildings³⁹. The significance of all of these designated heritage assets lies primarily in their architectural and historic fabric. However, as

³⁹ In determining the appeal I have taken into account the duty under section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 regarding the affect upon the setting of listed buildings.

noted in the detailed listing descriptions, with the exception of the stables at Home Farm and Belmont House⁴⁰, these buildings were commissioned by Francis Wegg-Prosser⁴¹ as part of his vision⁴² for a 'new city of God'.

43. The abbey complex and church were designed and built by E W Pugin and/or P Pugin. Many of the listing descriptions state: "*the group of Roman Catholic buildings at Belmont, which includes the abbey church of St Michael and All Angels, the Monastery, the Almshouses, the school and teacher's house and Belmont House with its chapel is one of the most complete surviving groups which resulted from the benefaction of a wealthy landowner in the mid-C19.*"
44. Many of the buildings in the abbey complex and Belmont House cannot be seen⁴³ from the appeal site. However, as set out in guidance⁴⁴ produced by English Heritage (EH), although views of or from an asset can be important, setting is also influenced by other environmental factors. In this instance, the open parkland character of the appeal site and its sense of tranquillity afford an appreciation of the significance of this group of Catholic buildings and their historical association with the almshouses. The character of the site also assists in alluding to the affluence of the former occupiers of Belmont House. It makes a positive contribution to the setting and significance of these designated heritage assets.
45. The listed stables at Home Farm were built contemporary with Belmont House. However, a separate stable block existed immediately alongside this Grade II* listed house and the track across the appeal site and adjacent to Home Farm was not the original driveway. There is also other evidence⁴⁵ to suggest that these listed stables were not built to serve the Belmont House. As I saw during my visit, these stables form part of a farmyard that is now largely screened from the appeal site. Nevertheless, the site forms part of the rural setting to these stables which have historical associations with the Belmont Estate and the surrounding countryside. Unlike the residential development to the east, the appeal site makes a positive contribution to the setting of the listed stables.
46. The illustrative masterplan shows the proposed dwellings set back from the entrance to the abbey complex and not extending beyond the common boundary with the almshouses. An area of green space is also indicated adjacent to Home Farm. Such a layout would retain some views across the site towards the church tower although other views⁴⁶ would be lost. In addition, the development would result in the loss of a sizeable area of open parkland/countryside which is of importance to the significance of the above noted listed buildings. The proposed housing would intrude into the setting of some nationally important buildings of special interest and two particularly important buildings of more than special interest. The erosion of the unspoilt open qualities of the site and its tranquillity, along with the loss of agricultural

⁴⁰ This was designed by James Wyatt for John Matthews but was extended and drastically remodelled in c1860 by E W Pugin for F C Wegg-Prosser.

⁴¹ Former owner of the Belmont Estate and MP for Herefordshire.

⁴² In 1852 Wegg-Prosser converted to Roman Catholicism after he had commissioned Richard Cromwell Carpenter to design the listed almshouses.

⁴³ There are views of the church tower. Views of the almshouses can also be seen from the appeal site.

⁴⁴ 'The Setting of Heritage Assets' (2011)

⁴⁵ Notes by P Davenport MIFA, FSA – Appendix A11 to Ms Stoten's proof of evidence.

⁴⁶ Although these would not be public views the 2011 EH guidance states that the contribution that setting makes to the significance does not depend on there being public rights or an ability to access or experience that setting.

- character, would distract from an appreciation of these designated heritage assets and harm their group value⁴⁷/significance.
47. For the stables at Home Farm, the proposed extension of the settlement edge around this asset would, in effect, bring this traditional farm building within the urban envelope and disconnect it from the countryside. This would mar the setting of the stables and erode the significance of this important rural building.
48. The proposal would conflict with the provisions of UDP policy HBA4. In the context of 'the Framework' this would amount to less than substantial harm to the significance of these designated heritage assets. However, this would be greater than the "*negligible impact*" that has been argued by the appellant. 'The Framework' seeks to conserve heritage assets in a manner appropriate to their significance and affords great weight to their conservation.
49. The less than substantial 'harms' to the designated heritage assets that I have identified all weigh against granting planning permission. However, there is no cogent evidence to support the Council's argument that these accumulate and result in substantial harm to buildings of group value
50. The appellant has drawn my attention to the 20th century development that has taken place alongside the abbey complex, as well as the development at Belmont House and the housing adjacent to the almshouses and Home Farm. This development has had an adverse effect upon the settings of the above listed buildings. However, I do not know the full circumstances or the 'planning balance' which led to these schemes being approved. Furthermore, in all likelihood, the circumstances today are materially different to those which existed when these other schemes were considered. These previous decisions do not set a precedent for the proposals before me. If anything, they increase the value of the remaining undeveloped parkland which is of significance to these listed buildings. This does not lend weight to the appellant's argument for allowing the appeal.
51. Both main parties have provided much information regarding the history of Belmont House and its parkland. This includes detailed research and evidence by Mr Whitehead⁴⁸ which indicates the past involvement of Uvedale Price, Humphry Repton and later, A M Nesfield, in the design and repair of the parkland. However, this research and evidence has been carefully considered⁴⁹ by EH's Designation Department and Belmont has not been included⁵⁰ within the national Register of Parks and Gardens. I must therefore treat the parkland as a non-designated heritage asset and have regard to the provisions of paragraph 135 of 'the Framework'.
52. Whilst a non-designated asset has less standing when considering the planning merits, the appeal site forms part of a historic park and garden which has been identified by the Council, in association with the Herefordshire and Worcester Gardens Trust, as an unregistered park and garden of local importance. I have already noted above that historic parks are a key component of this LCA and are afforded protection within the development plan.

⁴⁷ Excluding the stables at Home Farm.

⁴⁸ A leading figure on historic parks and gardens.

⁴⁹ Whilst Nesfield is not mentioned in the documentation from EH it would appear that a copy of Mr Whitehead's proof of evidence was provided to EH when they reviewed the decision not to register the parkland. It is reasonable to assume therefore that EH took this into account.

⁵⁰ I note in particular the Conclusion to the EH report where, amongst other things, it is considered that the landscape does not survive sufficiently well to justify registration.

53. In addition to the contribution the appeal site makes to the setting of the above listed buildings and the character and appearance of the area, this sizeable area of land with mature and veteran trees and a former driveway to Belmont House is an integral part of the wider Belmont parkland. Although it may have formed a later addition to the parkland and does not feature in views from the house or the River Wye, it adds to the significance of this designed landscape.
54. The proposed houses and roads would be a wholly discordant addition to the Belmont parkland. It would erode its picturesque qualities and largely extinguish the scene of piety which can still be appreciated in and around the appeal site. I have already found above that the development would considerably diminish the integrity of the parkland and this harm would not be overcome or outweighed by the proposed new planting. The proposal would conflict with UDP policy LA4.

Nature Conservation Interests

55. It is agreed between the main parties that the veteran trees and the grassland⁵¹ growing within the site are the two main elements of this UK and Herefordshire Biodiversity Action Plan (BAP) Priority Habitat⁵². The ancient woodland on the opposite site of Ruckhall Lane also comprises part of a UKBAP priority habitat. Under cross-examination, the appellant's ecological expert informed me that the hedgerow growing along the boundary with Ruckhall Lane was also a BAP Priority Habitat. This witness described this as a "*high quality hedgerow*". The appellant also accepts that the hedgerow along part of the north eastern boundary of the site is likely to qualify as a UKBAP Habitat.
56. The main parties also agree that, notwithstanding the fact that the appellant's reptile survey does not meet Natural England's requirement of 7 survey visits, the site provides a sub-optimal habitat for reptiles. It is also agreed that the areas with particular reptile interest are situated at the margins of the site⁵³. Three invertebrate surveys were also undertaken on behalf of the appellant. It is also agreed that this provides a snapshot of invertebrate interest⁵⁴ and that the Oak and Sweet Chestnut trees within the site support a rich invertebrate fauna⁵⁵. However, further survey work⁵⁶ was recommended by the appellant's invertebrate consultant and has not been undertaken. Separate survey work reveals a number of bats using the site⁵⁷ and a moderate assemblage of breeding birds, although no rare or notable species have been recorded.
57. Notwithstanding the extensive grazing of this area of parkland, the appeal site is of ecological interest, especially the veteran trees⁵⁸ which are of high ecological interest. As argued by the appellant, this could be limited to a local

⁵¹ The appellant's grassland surveys, which were undertaken at sub-optimal times of the year, identified about 10 different grasses and about 18 different herbs.

⁵² The site forms part of a UKBAP priority habitat identified as 'Wood-Pasture & Parkland'.

⁵³ Two juvenile Slow Worms were recorded at the north eastern site boundary.

⁵⁴ The main parties agree that no outstanding intrinsic invertebrate interest was recorded.

⁵⁵ Although the Council is critical of aspects of the appellant's separate lichen and bryophyte survey, no such survey was requested or undertaken by the Council. This survey work, by an experienced consultant, indicates a low number of species and none of a rare nature. There is nothing of substance to doubt the conclusions of the survey that this is due to high nutrient levels/pollution caused by the pasture land being heavily grazed by sheep.

⁵⁶ A "*significantly extended survey*" which also takes "*into account the hedgerows as well as the veteran trees*" was recommended.

⁵⁷ No bat roosts were detected.

⁵⁸ The English Nature (now Natural England) publication 'The Future for Veteran Trees' notes that such trees are important for many forms of wildlife.

level of interest. However, in the absence of extended survey work in respect of the veteran trees and hedgerows, the level of interest could be higher.

58. The proposal would include a conservation management plan for part of the site and an adjoining area of parkland. This would remove/reduce grazing around the trunks of the veteran trees and part of the remaining pasture would be seeded with wildflowers. New tree planting would also take place to secure a succession of veteran trees in part of the retained area of parkland. As I have already noted above, new hedgerows would also be provided within the site. In addition, bird and bat boxes would be provided. These measures could increase biodiversity interests.
59. However, the scheme would involve the loss of about 2.8ha of UKBAP Wood-Pasture & Parkland Priority Habitat. This would sit uncomfortably with the Council's aims for enhancing this area⁵⁹ and whilst there is evidence that grazing levels are high, grazing animals are fundamental to the existence of this habitat. The scheme would also disrupt the hedgerow along Ruckhall Lane. Even if a 'hop-over' was included as part of the proposed access works⁶⁰ it is very far from certain that this would be successful in avoiding disturbance to invertebrates, bats or other species that may use this green corridor. The proposals would also considerably increase activity⁶¹ in and around the site and be likely to cause further disturbance to wildlife. Incoming residents may also be less tolerant to the sight of dead and decaying wood⁶² in veteran trees than a farmer with sheep grazing the land. This could result in future pressure being applied on the Council to remove wood that is of biodiversity interest.
60. Overall, the proposal would be likely to have a broadly neutral effect on biodiversity interests and be consistent with UDP policies NC1, NC6 and NC7.

Benefits of the Scheme

61. The proposals would assist in addressing the shortfall in housing supply within the district and contribute towards achieving a five year supply of housing. It would also increase choice of housing and accord with the Government's objective to boost significantly the supply of housing. The affordable housing element⁶³ of the scheme would assist in meeting housing needs of the local community. These are important matters which can be given considerable weight in the determination of this appeal.
62. The development would assist in supporting local services and facilities, as well as strengthening the construction industry. These economic considerations can be given much weight in determining this appeal. The proposal would also provide the Council with additional revenue via the New Homes Bonus.

⁵⁹ Green Infrastructure Strategy: Herefordshire (LDF 2010) Report.

⁶⁰ No such feature is shown on the access details which I am being asked to consider as part of the appeal.

⁶¹ Including noise and external lighting.

⁶² The importance of this to wildlife is noted in the publication 'Ancient Tree Guide no.6: The Special Wildlife of Trees' by the Woodland Trust and the Ancient Tree Forum.

⁶³ The evidence before me indicates that there is a considerable need for affordable housing within the district. I agree with both main parties that this element of the S106 agreement would accord with the provisions of paragraph 204 of 'the Framework'. I have therefore taken it into account in determining the appeal.

Other Matters

63. The TA demonstrates that the proposals would be unlikely to compromise highway safety interests. Both main parties also agree that the site is in a sustainable location, in close proximity to bus stops with regular services into the city centre. Cycle routes are available within the neighbouring residential development to the east and there are footways throughout the area and crossing facilities at key junctions⁶⁴. It is also agreed that the site allows easy access to employment opportunities within the city centre. This lends weight to the appellant's argument for releasing this site for housing development.
64. Nevertheless, some incoming residents would travel by car during the peak morning and evening periods. I note during these periods the A465/A49 is congested with long queues⁶⁵. The appeal scheme would add to this congestion and would likely to further inconvenience existing road users during these periods. However, the TA states that the proposal would not have a material impact when compared to the existing situation. Neither the Council nor the Highways Agency raised highway objections to the scheme.
65. In the context of paragraph 32 of 'the Framework' the transport impacts of the development would not be "severe". It would therefore be unsound to withhold permission on the basis of the limited increase in congestion. Whilst commonsense would suggest avoiding making a bad situation worse, I shall not treat this as a 'harm' when I undertake the overall planning balance.
66. I also note the concerns of some residents regarding drainage and water supply. However, the appellant's Flood Risk Assessment and drainage strategy demonstrate that the proposal would not increase the risk of flooding. There is also no technical or other cogent evidence to demonstrate that the proposal would cause foul sewage problems in the surrounding area or cause water supply problems. I note that neither the water company nor the Environment Agency objected to the scheme.
67. Both main parties have drawn my attention to many appeal decisions⁶⁶ on sites elsewhere. However, I have determined this case on its own merits. I concur with the findings of the Inspector at Alsager⁶⁷ who remarked that it is rarely the case that appeal decisions on other sites will bring to light parallel situations and material considerations which are so similar as to provide justification for decisions one way or another.

Planning Balance/Overall Conclusion

68. The proposed planting, parkland management and measures intended to enhance biodiversity interests do not overcome or outweigh the harm that I have identified to the character and appearance of the area. As a consequence, the proposal would be at odds with the environmental role/dimension to sustainable development. Moreover, notwithstanding the shortfall in HLS, these adverse environmental impacts and the harm to the setting of heritage assets that I have also identified would significantly and demonstrably outweigh the economic and social dimensions/benefits of the

⁶⁴ This has the potential to reduce travel by car.

⁶⁵ This is also referred to in the numerous letters of representation that have been made by local residents. I appreciate that this likely to considerably inconvenience those travelling during these parts of the day.

⁶⁶ In total about 30 decisions have been provided. In all likelihood, this has also added to the complexities of the case for those members of the local community who were following the proceedings.

⁶⁷ Paragraph 68 – APP/R0660/A/13/2195201

scheme. The proposal would therefore fail to contribute to the achievement of sustainable development. The appeal should not therefore succeed.

Neil Pope

Inspector

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Ms J Wigley of Counsel She called	Instructed by the Solicitor for the Council
Mrs B Symons BSc (Hons), ALGE	Former Senior Ecologist (Planning)
Mrs A Neill CMLI	Former Senior Landscape Officer
Mr D Whitehead MA, FSA	Former Head of History at Hereford Sixth Form College and specialist in landscape and architectural history.
Miss K Gibbons BA (Hons), Bpl, MRTPI	Principal Planning Officer

FOR THE APPELLANT:

Mr J Cahill Q C He called	
Mr J Peachey BSc (Hons), MLD, CMLI	Landscape Design Director, Pegasus Group
Ms G Stoten BA (Hons), MIFA, FSA	Principal Heritage Consultant, Cotswold Archaeology
Mr A Baxter BA (Hons), MA, MSc, CEnv, MCIEEM	Director, Aspect Ecology
Mr A C Bateman BA (Hons), TP, MRTPI, MCMI, MIOd, FRSA	Managing Director, Pegasus Group

INTERESTED PERSONS:

Mrs K M Keeler	Resident
Fr. Simon McGurk	Belmont Abbey
Cllr P J Edwards	Member of Belmont Rural Parish Council, Ward Member of Herefordshire Council and Mayor of Hereford City Council
Cllr A N Bridges	Member of Belmont Rural Parish Council and Ward Member of Herefordshire Council
Cllr J Thorne	Clehonger Parish Council
Mrs J Patton	Hereford and Worcester Gardens Trust (HWGT)

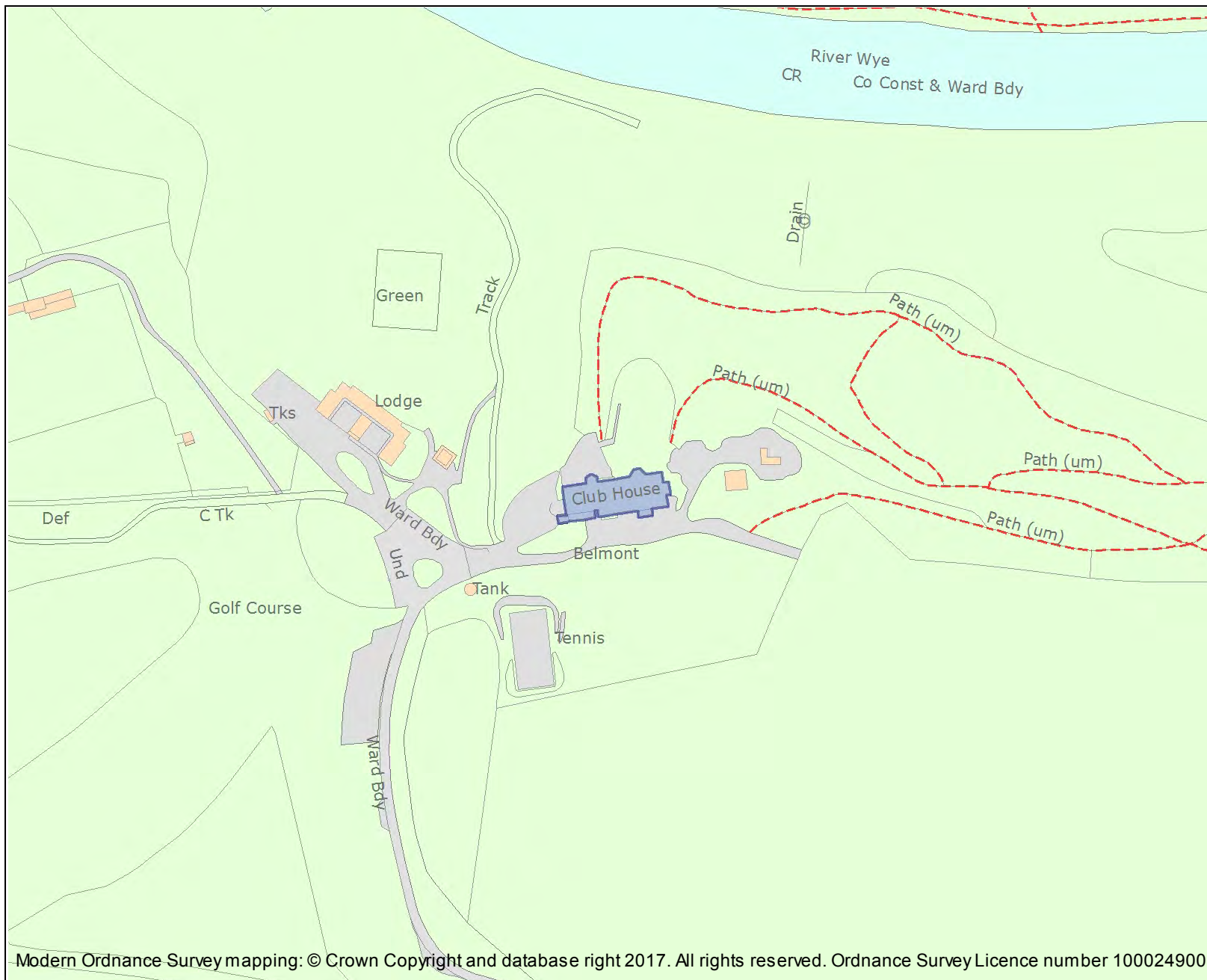
LIST OF DOCUMENTS SUBMITTED AT THE INQUIRY:

Document 1	Opening Statement on behalf of the appellant
Document 2	Opening Statement on behalf of the Council
Document 3	Mrs Keeler's Statement
Document 4	Fr McGurk's Statement

Document 5	Cllr Bridges's Notes
Document 6	Note from Cllr Thorne
Document 7	Mrs Patton's Statement
Document 8	E-mail from HWGT to English Heritage dated 15 July 2013
Document 9	Appendix 12 to Mr Whitehead's proof of evidence
Document 10	Copy of listing description for Belmont House
Document 11	Photographs of Home Farm
Document 12	HLS Tables 1, 2 and 3 prepared by the appellant
Document 13	HLS Tables 1, 2 and 3 prepared by the Council
Document 14	Matters in Dispute – HLS
Document 14	The Council's Position Statement in respect of HLS
Document 15	HLS spreadsheet
Document 16	Extracts from the proposed Hereford Relief Road study
Document 17	Translocating Wildlife Habits guide
Document 18	E-mail from Pegasus Planning in respect of TPOs
Document 19	Note from the Council – Consultation with Natural England
Document 20	E-mail from Pegasus Planning re: the arboricultural report
Document 21	Landscape Character Assessment SPG – Consultation
Document 22	Section 106 planning agreement
Document 23	Section 106 unilateral undertaking
Document 24	Playing pitch assessment for the S106 agreement
Document 25	Suggested planning conditions
Document 26	Timetable for closing submissions and the costs application

DOCUMENTS SUBMITTED AFTER THE INQUIRY WAS ADJOURNED ON 15/11/13

Document 27	Closing submissions on behalf of the Council
Document 28	Closing submissions on behalf of the appellant
Document 29	The appellant's costs application
Document 30	The Council's response to the costs application
Document 31	The appellant's response to the Council's closing submissions
Document 32	The appellant's response to the Council costs response



Heritage Category:	Listing
List Entry No :	1167079
Grade:	II*

County:	
District:	County of Herefordshire
Parish:	Belmont Rural

For all entries pre-dating 4 April 2011 maps and national grid references do not form part of the official record of a listed building. In such cases the map here and the national grid reference are generated from the list entry in the official record and added later to aid identification of the principal listed building or buildings.

For all list entries made on or after 4 April 2011 the map here and the national grid reference do form part of the official record. In such cases the map and the national grid reference are to aid identification of the principal listed building or buildings only and must be read in conjunction with other information in the record.

Any object or structure fixed to the principal building or buildings and any object or structure within the curtilage of the building, which, although not fixed to the building, forms part of the land and has done so since before 1st July, 1948 is by law to be treated as part of the listed building.

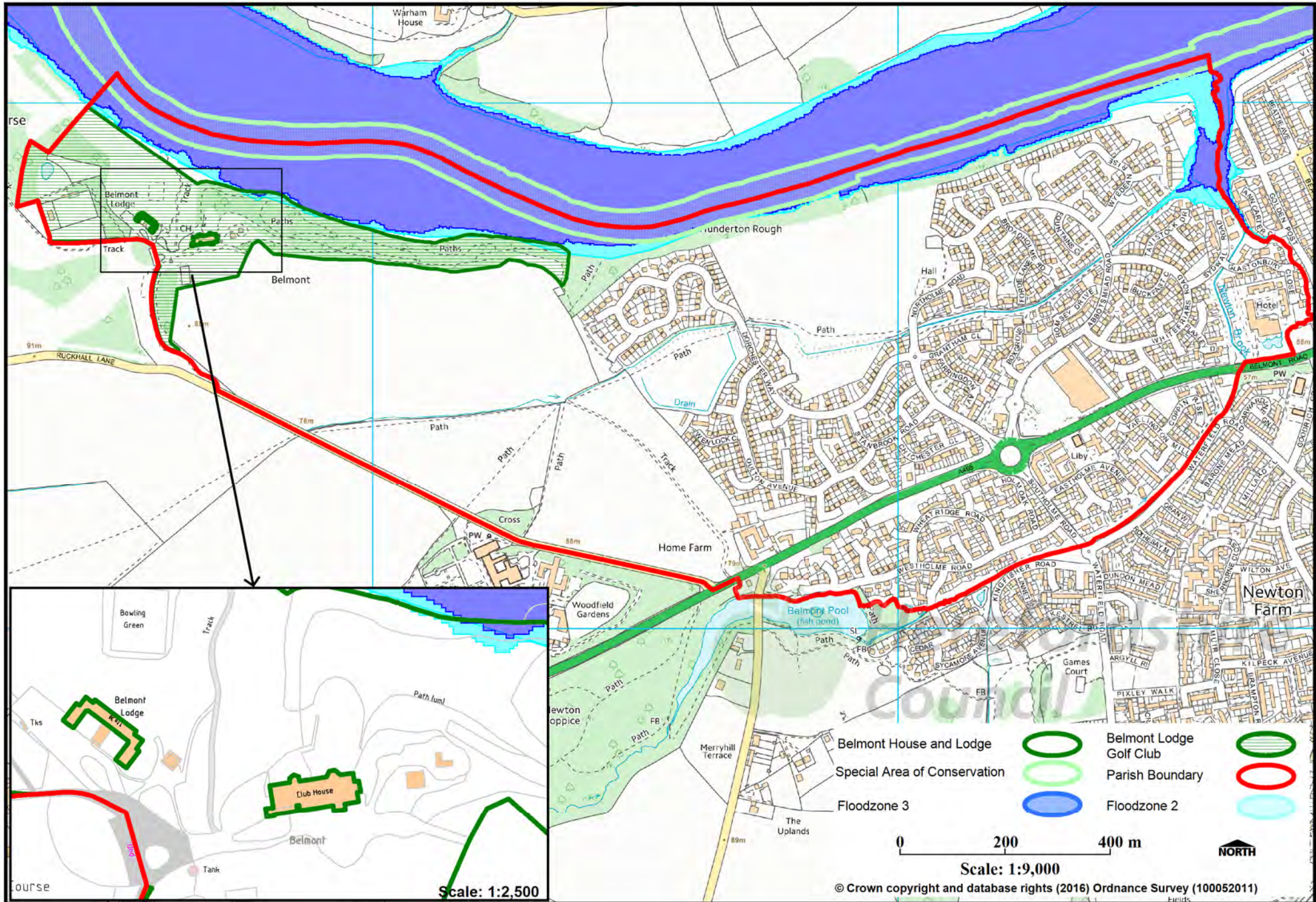
This map was delivered electronically and when printed may not be to scale and may be subject to distortions.

List Entry NGR:	SO4768138741
Map Scale:	1:2500
Print Date:	19 April 2017

Name: BELMONT HOUSE

This is an A4 sized map and should be printed full size at A4 with no page scaling set.





- Belmont House and Lodge
- Special Area of Conservation
- Floodzone 3
- Belmont Lodge Golf Club
- Parish Boundary
- Floodzone 2

0 200 400 m

Scale: 1:9,000

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21 April 2017
FINAL Examiner Query Response



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Dear Samantha

Belmont Rural Neighbourhood Development Plan Examination Query Response

In response to your email dated 6 April 2017, we are writing to provide the additional details that were requested by the Examiner concerning the representations that we submitted on behalf of our client, Golf Inns Limited, to the Belmont Rural Neighbourhood Development Plan Submission consultation in December 2016.

We have been asked to provide additional details for the following:

- Evidence of the previous contact which has been undertaken with Historic England
- The potential viability of the current site boundaries and proposals within Policy NDP3
- Evidence for the need for enabling development to support the existing building

Historic England

Attached is a letter, dated 24 September 2008, from English Heritage, (now Historic England) to our client. This letter should assist the Neighbourhood Plan Examiner with the additional details requested on each of the three points raised. The letter was written by an English Heritage Team Leader and Inspector of Historic Buildings in relation to the future of Belmont House and the adjoining parkland.

The Inspector concluded that substantial works would be required to repair Belmont House and bring it back into use. Paragraph 3 of the letter sets out that due to the financial scale of the problem, English Heritage would unlikely be able to offer a grant of the size required to resolve the case. The Inspector concluded that the solution to the problem was enabling development, by dividing the house into a number of large apartments and building a small development in the grounds. The Inspector also alluded to the fact that the financial scale of the problem could be several million pounds back in 2008. 9 years on we assume that the costs will have increased further.

In the following section of this letter, I have set out how we consider that the area of land proposed for development in the Belmont Rural Neighbourhood Plan Policy 3 (Figure 11), may not be sufficient to provide the funds required to enable the redevelopment of Belmont House. Furthermore, as part of the emerging proposals for the Western Relief Road, we consider that an opportunity for comprehensive development should also be considered and therefore the restrictive approach being proposed in the Neighbourhood Plan is not appropriate or justified.



Constraint Plans

We have attached three plans for your reference where we have attempted to highlight the potential viability issues associated with the current site boundary shown in Policy 3 (Figure 11) of the Belmont Rural Neighbourhood Plan.

Plan 1 titled 'Belmont Rural Neighbourhood Plan Policy 3 Proposed Site – Constraints Plan' shows the proposed site boundary that is shown on Figure 11 of the Belmont Rural Neighbourhood Plan. Following a high level review of the site, we have identified the constraints within the development boundary proposed Neighbourhood Plan. We have highlighted a range of environmental, historic and ownership constraints including:

- Belmont House, Walled Garden and Stone and Plaque Heritage Assets and their Setting (shown in red on Plan 1) – Belmont House is a Grade II* listed building and the Walled Garden and Stone and Plaque are both Grade II listed buildings. All of these historic assets will have to be retained, conserved and protected.
- Belmont House Significant Views and Steep Topography (shown in burgundy on Plan 1) – we consider that the north-westerly views across the River Wye landscape make a positive contribution to the significance of Belmont House. In addition to this the topography of the land shown in this area slopes significantly towards the River Wye.
- Land in another ownership (shown in orange on Plan 1) – this is an existing dwelling in a separate ownership to our clients and therefore, unless the existing owners wish to sell their land, it is undevelopable. The Grade II listed Walled Garden and Stone and Plaque are both located within this ownership.
- Woodland / Site of Importance for Nature Conservation ('SINC') (shown in dark green on Plan 1) – the large area of woodland running from Belmont House to the eastern edge of our client's land has been highlighted for development. However it is also a SINC and therefore development is likely to be inappropriate in this area.
- Other Woodland (shown in light green on Plan 1) – there are two areas of woodland within the proposed site which we consider would need to be retained if the site is developed.
- Access (shown in grey on Plan 1) – this is the existing and only available access point into the proposed site.

Plan 2 titled 'Belmont Rural Neighbourhood Plan Policy 3 Proposed Site – Developable Area', highlights the constrained and developable areas within the Policy 3's proposed site boundary. The area shown in grey is land that is constrained and, in our opinion, undevelopable. The area hatched in yellow is the land which is less constrained and could potentially be developed. We have calculated that the net developable area (area hatched in yellow) of the proposed Policy 3 site boundary is circa 0.43 hectares (1 acres) which could yield approximately 9 dwellings (based on 30 dwellings per hectare at 70% capacity). We consider that 9 dwellings will fall a long way short of providing the capital required in order to enable the refurbishment of Belmont House.

Plan 3 titled 'Wider Belmont Rural Development Opportunity Plan', shows the wider context of our client's land (shown by the red line boundary) and the potential for further development which could resolve the financial problems associated with the redevelopment of Belmont House. The 0.43 hectares (1 acre) of less constrained land which could be provided by the existing proposed Neighbourhood Plan boundary is not enough by itself and therefore consideration of additional land must be made in order to provide the necessary amount of enabling development. Plan 3 shows an area of land within our client's land ownership which was previously supported by English Heritage for enabling development (shown in pink). This land lies

outside of the Neighbourhood Plan's proposed development boundary (Figure 11) but it could offer the additional land required for enabling development.

At this stage, consideration should also be given to the wider strategic development opportunities that the development of the former golf course could provide, given the huge investment that is being proposed on the new Western Relief Road. On Plan 3, we have shown the wider potential development area in yellow. There is approximately 39 hectares (96 acres) of land under the control of Golf Inns Ltd which could potentially yield approximately 700 dwellings (calculated at 30 dwellings per hectare at 60% capacity). Development at this scale would make the most of the sustainability and accessibility opportunities that the proposed Relief Road will provide and help assist Herefordshire Council in meeting their housing requirements.

We have also shown on Plan 3 some additional potential development land outside of our client's ownership at Home Farm to the south east of the red line boundary. This could provide a further 11 hectares (27 acres) of potential development land shown on Plan 3. The appeal at Home Farm (reference APP/W1850/A/13/2192461) was refused primarily because of its impact on the environment and the harm to the setting of heritage assets. At the time, the Inspector wrote that the proposals for the Western Relief Road had not been determined and it was uncertain whether they would bisect the unregistered Belmont Parkland and therefore the Relief Road was not given weight in the determination of the appeal. The Western Relief Road options are currently being consulted on and the proposed route options do pass through the unregistered Belmont Parkland.

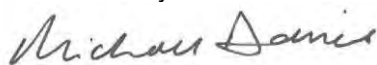
We have had heritage and landscape advice to assist us in ascertaining the development option that would have the least impact on the landscape and heritage assets in the area. Cotswold Archaeology (Heritage Consultant) have undertaken an assessment of all of the route options shown on Plan 3 and they concluded that the 3 'inner corridor' options would harm the significance of Belmont House and other heritage assets outside of our client's ownership. If any of the eastern ('inner') route options are taken then the sensitivity of this heritage landscape will reduce. Waterman Infrastructure & Environment Limited's Landscape Assessment also concluded that the Relief Road passing through the Unregistered Parkland will lower the sensitivity of the landscape. The landscape sensitivities that exist at the moment will change significantly should the Relief Road be developed along one of the eastern alignments and therefore we consider that the area highlighted in yellow on Plan 3 should be considered for development.

In our representations to the Submission version of the Neighbourhood Plan we noted that we did not consider that Policy 3 or Policy 6 took enough account of the Western Relief Road and the development opportunities it will create. We consider that it is premature for the Belmont Rural Neighbourhood Plan to be progressed before the Hereford Area Plan and Western Relief Road Route has been progressed further or the Hereford Area Plan (HAP) has been through Examination. If the Neighbourhood Plan is progressed to being made, then it should be based on sound evidence and take account of the HAP proposals.

We consider that the issues associated with Belmont Rural Neighbourhood Plan and the proposed Western Relief Road are extremely important and we request that a hearing is held in order for us to discuss these issues in more detail.

I hope that that we have provided you the additional information that you require in order to proceed with the examination of the Belmont Rural Neighbourhood Plan. Please contact me again should you have any further queries.

Yours sincerely



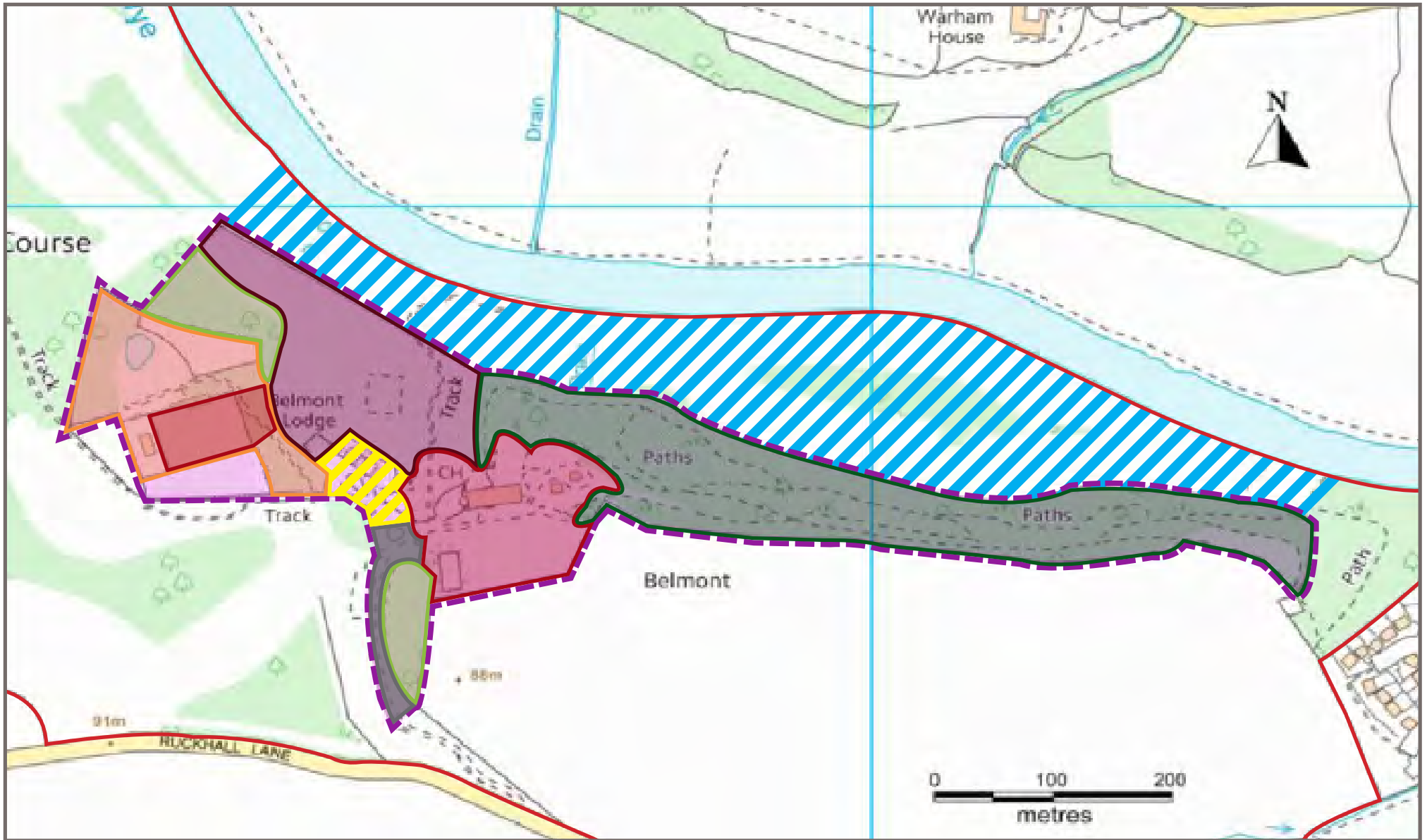
Michael Davies
Director

Encs x4

- English Heritage Letter (2008)
- Plan 1 – Belmont Rural Neighbourhood Plan Policy 3 Proposed Site – Constraints Plan
- Plan 2 – Belmont Rural Neighbourhood Plan Policy 3 Proposed Site – Developable Area
- Plan 3 – Wider Belmont Rural Development Opportunity Plan

PLAN 1

Belmont Rural Neighbourhood Plan Policy 3 Proposed Site - Constraints Plan



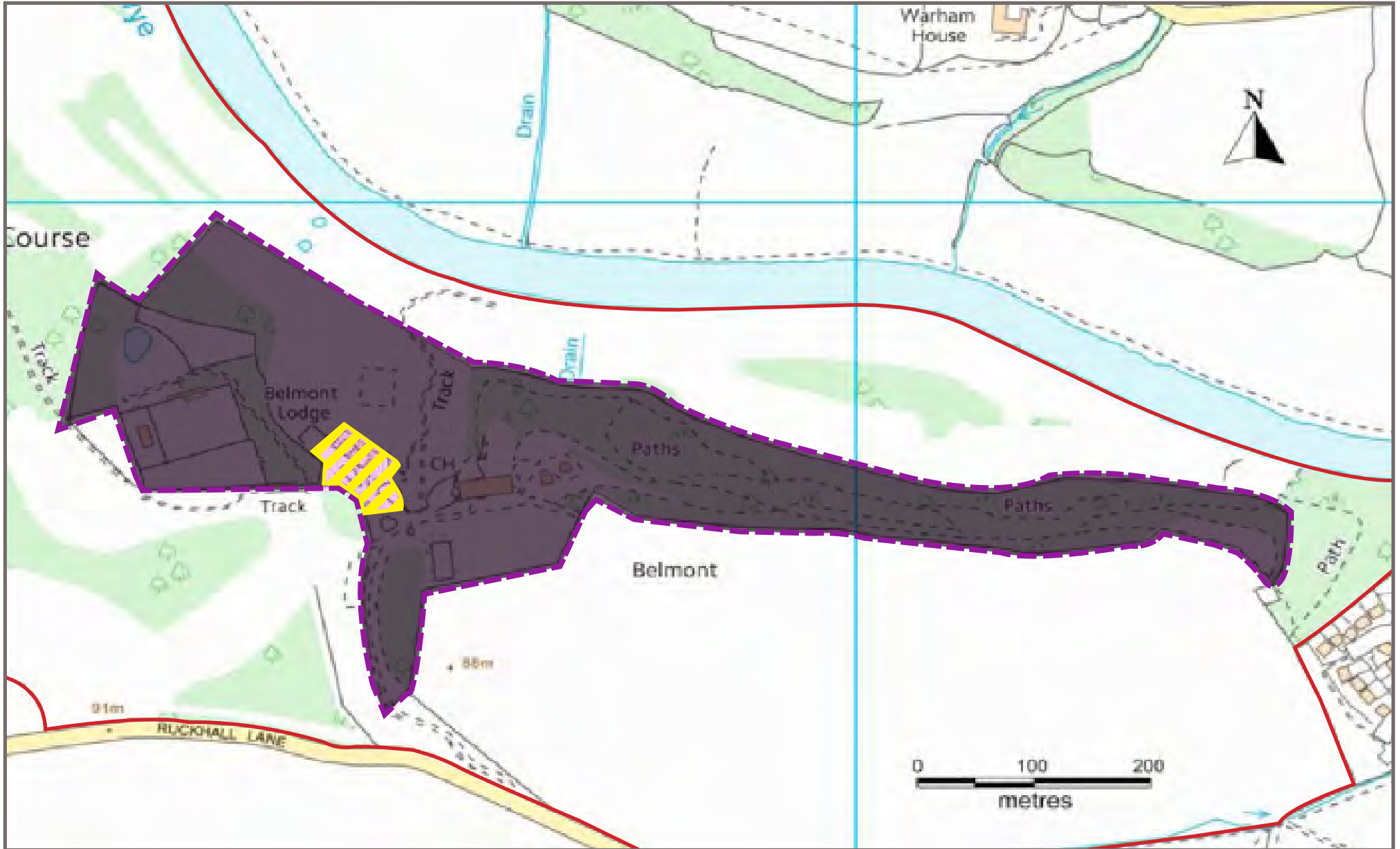
- | | | | |
|---|---|---|--------|
| Golf Inns Ltd (Client) Land Ownership | Woodland | Belmont House & Setting, Walled Garden & Stone and Plaque | Access |
| Potential Development Area (approx 0.43ha / 1 acre) | Woodland / Site of Importance for Nature Conservation | Belmont House Significant Views & Steep Topography | |
| Other Ownership | Flood Zone 3 | Belmont Rural NDP Policy 3 Proposed Site Boundary | |

Base plan extracted from Fig.11 Belmont Rural Neighbourhood Plan (Submission Version).

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PLAN 2 Belmont Rural Neighbourhood Plan Policy 3 Proposed Site - Developable Area



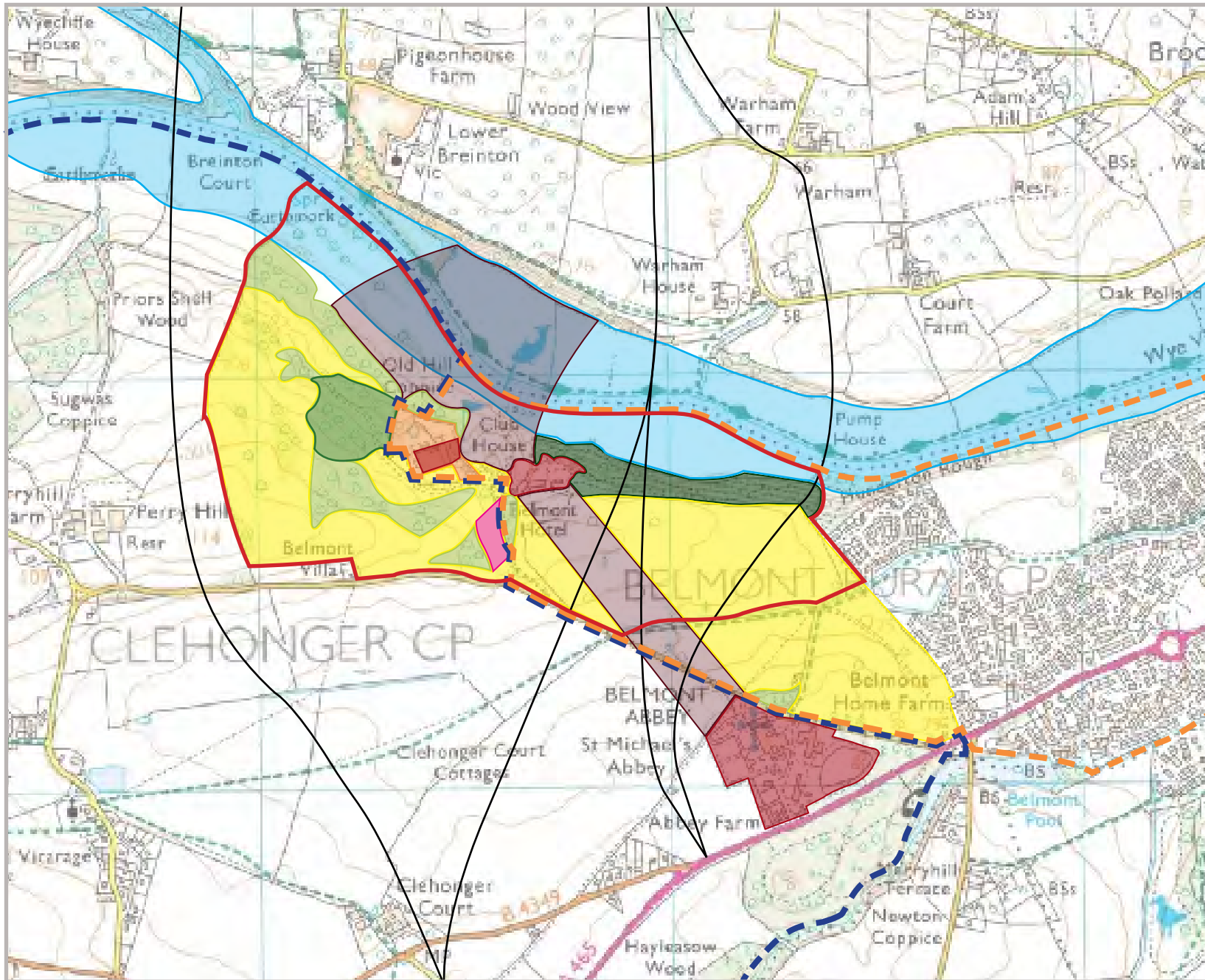
- | | |
|---|---|
|  Golf Inns Ltd (Client) Land Ownership |  Potential Development Area (approx 0.43ha / 1 acre) |
|  Belmont Rural NDP Policy 3 Proposed Site Boundary |  Constrained Land (Undevelopable) |

Base plan extracted from Fig.11 Belmont Rural Neighbourhood Plan (Submission Version).

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PLAN 3 Wider Belmont Rural Development Opportunity Plan



- Golf Inns Ltd (Client) Land Ownership
- Potential Development Area
- Other Ownership within Golf Inns Ltd Land Ownership Boundary
- Woodland
- Ancient Woodland
- Woodland / Site of Importance for Nature Conservation
- Flood Zone 3
- Historic Assets & Setting (Belmont House, Walled Garden, Stone and Plaque & Belmont Abbey)
- Belmont House Assumed Significant View Corridors & Steep Topography
- Western Relief Road Options
- Area Previously Supported by English Heritage as Enabling Development
- Clehonger Neighbourhood Plan Area Boundary
- Belmont Rural Neighbourhood Plan Area Boundary

Ordnance Survey extracted from <https://www.bing.com/maps/> (Location: 52.043999, -2.747).

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WEST MIDLANDS REGION

David Milton
Managing Director, Golf Inns Ltd
Belmont Lodge & Golf
Belmont
Hereford
HR2 9SA

Direct line: 0121 625 6857

24 September 2008

Dear David Milton

Belmont House, Hereford

I write concerning the discussions we had earlier in the year concerning the future of this building and the adjoining parkland, following on from discussions you have had with my colleagues and Herefordshire District Council. You showed me the proposals which Harkstave Leisure & Care have put together in outline form.

The view of English Heritage remains that the main building is definitely at risk. It is not on our Buildings at Risk register lightly. Having looked over the building, apart from the use of the basement by the golf club, the building is in a poor state of repair. The basic repairs to the building have been kept under control, including eradication of outbreaks of rot. But when we looked at the state of the windows and of the decorative external stonework it was obvious that the problems are more fundamental and will require substantial works..

Thus, the conclusion is that grant aid and/or enabling development will be needed to resolve the problems of the house. The financial scale of the problem (several millions) is such that it is unlikely that we could offer a grant of the size required to resolve the case. Thus the solution would seem to lie in enabling development, which would include dividing the house into a number of large apartments, and building a small development in the grounds. The latter should be possible subject to the scale of it, its location and the details of the design.

It would seem to me that there is a now need to re-engage with the planners and the conservation staff at Herefordshire Council in order to progress the matter further. We, of course, would be more than happy to engage in those further discussions.

We have just published (in the last few days) a new version of Enabling Development Policy document, which I enclose for your information. This does not materially change the policy we had before, but refines the advice on the basis of experience since the previous version was produced.

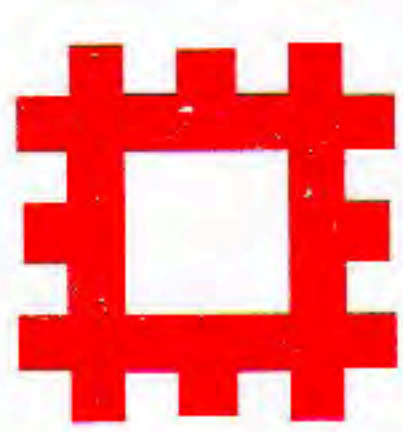
THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TG

Telephone 0121 625 6820 Facsimile 0121 625 6821

www.english-heritage.org.uk

The National Monuments Record is the public archive of English Heritage





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WEST MIDLANDS REGION

I should also add that my colleague John Yates is now back in harness and will be taking this case back into his work load.

Yours sincerely

Nicholas A D Molyneux

Team Leader and Inspector of Historic Buildings

cc John Yates


John Stagg, Senior Conservation Officer, Hereford Council

Not to scale

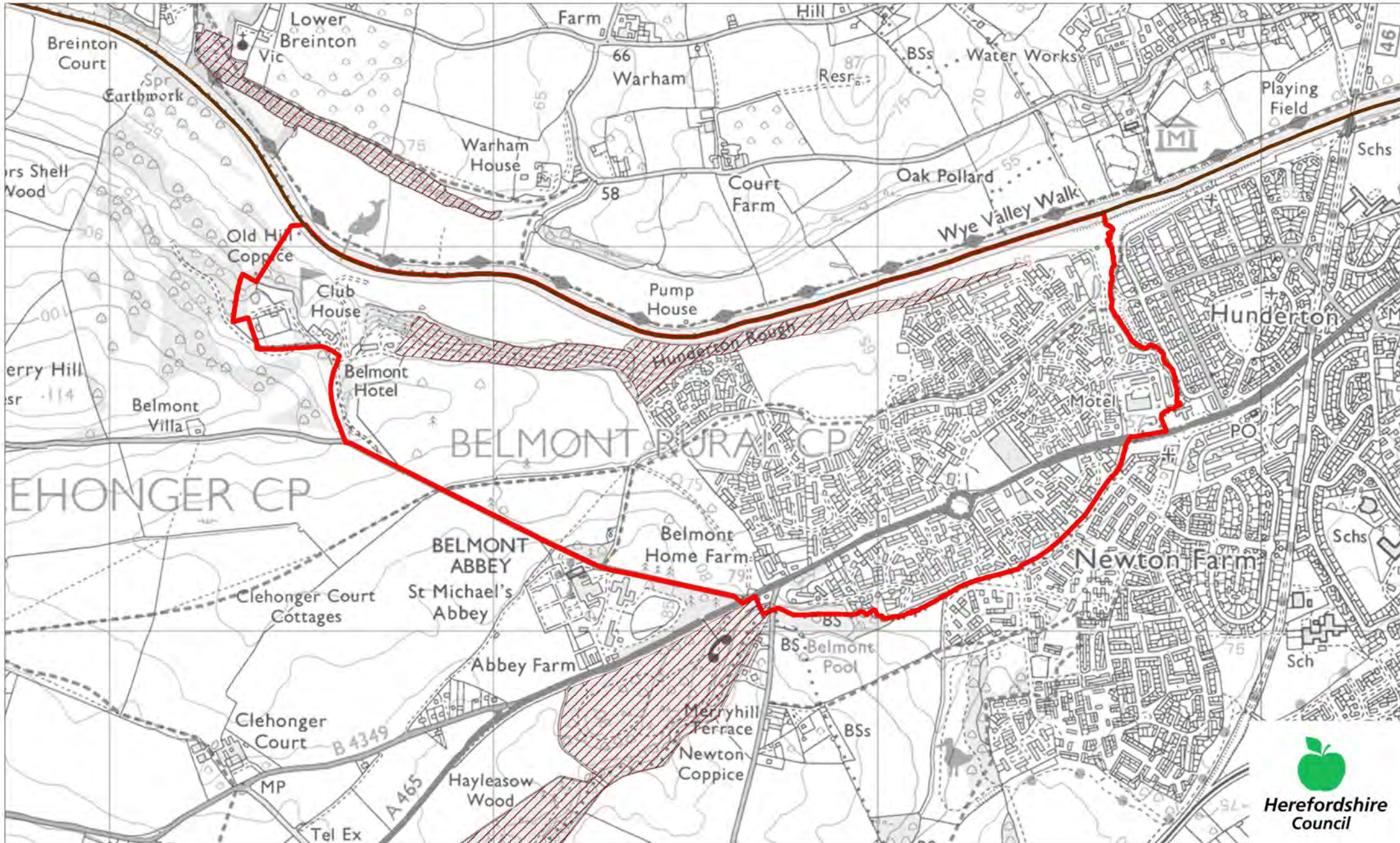


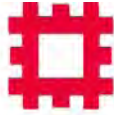
Local Wildlife Sites in and around Belmont Rural Neighbourhood Area

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 Local Wildlife Sites

 Local Wildlife Sites





ENGLISH HERITAGE

WEST MIDLANDS REGION

Neighbourhood Planning Team
Herefordshire Council
Planning Services
PO Box 230
Blueschool House
Blueschool Street
Hereford
HR1 2ZB.

Our ref:
Your ref:

Telephone 0121 625 6887
Fax 0121 625 6820

01 October 2014

Dear Sir or Madam

CONSULTATION ON SEA SCOPING REPORTS FOR NEIGHBOURHOOD PLANS IN: Belmont Rural; Border Group; Bosbury & Catley; Cradley; Hampton Bishop; Hatfield & District Group; Kingsland: Kingstone and Thrupton Group; Pembridge.

Thank you for your e-mails and the invitation to comment on the SEA Scoping Reports for the Neighbourhood Plans listed above. We have no substantive objection to the contents of the documents. However, having considered the above Neighbourhood Plans please note that overall our comments and recommendations to you in relation to these remain substantively the same as those which we communicated to you in our letter of the 15th August 2014 in response to the first tranche of SEA Scoping Reports. We urge you to refer back to and consider these representations before finalizing the reports in relation to the above Neighbourhood Plans also.

Specifically in relation to the fourth tranche of consultations we are pleased to note that some of the SEA's now appear to reflect aspects our earlier advice, perhaps particularly Belmont Rural, Hampton Bishop and Border Group.

However, Hatfield and District and Kingstone and Thrupton Group have proposed indicators for locally important buildings in conservation areas but in fact neither Parish has a conservation area so the indicator should more properly refer to locally important buildings "in the Parish". The Kingsland SEA identifies Kingslands Castle and St Michaels Church as BAR but only proposes to address the improvement of the condition of the Castle, which appears to be anomalous.

Both Kingsland and Pembridge and other of the SEA's appear to have anomalous references to SAM's, the Herefordshire SMR, monitoring changes to historic landscapes and historic landscape character assessments in relation to SA Objective 14 "Use natural resources and energy more effectively". Presumably this is unintentional and they would in fact be more relevant under SA Objectives 15 and 20?

I hope this is helpful.

Yours faithfully

A handwritten signature in black ink, appearing to read 'P. Boland', with a stylized flourish extending to the right.

Pete Boland
Historic Places Adviser
E-mail: peter.boland@english-heritage.org.uk

Date: 25 September 2014
Our ref: 131492
Your ref: None



James Latham
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Neighbourhood Planning, Strategic Planning & Conservation teams
Herefordshire Council
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T 0300 060 3900

BY EMAIL ONLY

Dear Mr Latham

Belmont Rural Strategic Environmental Assessment Scoping and Habitat Regulations Assessment Screening report

Thank you for your consultation on the above dated 08 September 2014 which was received by Natural England on the same date.

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.

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.

Where Neighbourhood Plans could have significant environmental effects, they may require a Strategic Environmental Assessment (SEA) under the Environment Assessment of Plans and Programmes Regulations 2004.

Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the National Planning Practice Guidance at:
<http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/does-a-neighbourhood-plan-require-a-sustainability-appraisal/>

We welcome the production of this SEA Scoping report. The following comments are intended to further improve the SEA and its usefulness in assessing the Neighbourhood Plan.

Appendix A1 – Plans, policies and programmes

Natural England approves of the plans, policies and programmes listed.

Appendix A2 – Baseline information

Biodiversity, flora and fauna



Under the proposed indicator “*Changes to protected habitats and impacts of species within the Herefordshire Local Biodiversity Action Plan*”, no baseline information source has been identified. Maps of priority habitats and species are available on *Magic*, Defra’s GIS package for environmental assets (www.natureonthemap.naturalengland.org.uk).

Baseline information on the landscape and open spaces needs to be included under SA objective 15: “*Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces*”. We welcome the reference to the Historic Landscape Characterisation for Hereford. Reference could also be made to the county Landscape Character Assessment.

Water, air, soil and material assets

This section (or suitable alternative) should include information on geodiversity. The baseline and assessment should make reference to geological conservation and the need to conserve, interpret and manage geological sites and features, both in the wider environment and in relation to designated features. The Herefordshire & Worcestershire Earth Heritage Trust may be of assistance.

Soil

We note that the best and most versatile agricultural land has not been considered. We suggest including an indicator to monitor the hectares of the best and most versatile agricultural land lost to development.

Appendix A3 – Environmental issues identified from the baseline

Natural England welcomes the environmental issues identified.

Appendix A4 – SEA Framework

Under the SEA topic “*Biodiversity, flora and fauna*” and the SEA objective “*Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces*”, landscape quality and open spaces have not been covered in the indicators. Relevant indicators should be added, or will not be possible to monitor the impacts of the plan on the landscape and open space. Reference could be made to the county Landscape Character Assessment and Landscape Characterisation studies including Historic Landscape Characterisation if this has been carried out. Applications resulting in the loss of open space could be monitored.

We would also welcome the inclusion of an indicator/target around the impact/benefit to ecological networks (NPPF paragraph 109, 113 and 117). We note that no targets have been identified against the indicator “*After use of mineral sites especially wildlife habitat creation*”; we suggest that perhaps the percentage of opportunities taken could be monitored.

Under SEA topic “*material assets*”, there are no targets identified against the indicator “*monitoring changes to the historic landscape*”. We suggest that the LPA could utilise Historic Landscape Characterisation studies and monitor the number of applications permitted despite a significant impact on the landscape having been identified.

Habitats Regulations Assessment Screening

Where a Neighbourhood Plan could potentially lead to significant environmental effects it will be necessary to screen the Plan in relation to the Habitats and Species Regulations (2010), as amended (the ‘Habitats Regulations’). One of the basic conditions that will be tested at Examination is whether the making of the plan is compatible with European obligations and this includes requirements relating to the Habitats Directive.

In relation to the Habitats Regulations, a Neighbourhood Plan cannot progress if the likelihood of significant effects on any European Site, either alone (or in combination with other plans and projects) cannot be ruled out) (see Schedule 2, The Neighbourhood Planning (General) Regulations 2012). Therefore measures may need to be incorporated into the Neighbourhood Plan to ensure that any likely significant effects are avoided in order to secure compliance with the Regulations. A screening exercise should be undertaken if there is any doubt about the possible effects of the Plan on European protected sites. This will be particularly important if a Neighbourhood Plan is to progress before a Local Plan has been adopted and/or the Neighbourhood Plan proposes development which has not been assessed and/or included in the Habitats Regulations Assessment for the Local Plan.

We note the recommendation that a full Habitat Regulations Assessment Screening is undertaken due to proximity to the River Wye Special Area of Conservation (SAC).

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Hayley Fleming on 0300 060 1594. For any new consultations, or to provide further information on this consultation please send your correspondences to 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

Hayley Fleming
Lead adviser – Planning
South Mercia Area Team
(Gloucestershire, Herefordshire, Worcestershire, Warwickshire, Coventry and Solihull)