



Ocle Pychard Group Neighbourhood Development Plan

Response to Regulation 16 representations

Introduction

1. The Ocle Pychard Group Neighbourhood Development Plan (NDP) was submitted to Herefordshire Council on 23 March 2018. A consultation in accordance with Regulation 16 was carried out from 27 March to 8 May 2018. A total of 15 representations were received.
2. The NDP was sent for examination on 22 May 2018. As part of this process the Parish Council has been given an opportunity to comment on the representations made. The majority are in the nature of 'no comment' or 'no further comment', but several raise more substantive matters and the Parish Council appreciates the opportunity to clarify the position on these aspects. The Parish Council's comments on these representations are set out in the schedule overleaf.
3. The Parish Council has no comment to make on the remaining representations.

Schedule of comments by Ocle Pychard Group Parish Council on selected representations to the Ocle Pychard Group NDP regulation 16 consultation

LPA = Local planning authority (Herefordshire Council)

LPCS = Herefordshire Local Plan Core Strategy

NDP = Ocle Pychard Group Neighbourhood Development Plan

Summary of representation	Parish Council comment
<p>Representation by: Archie Adams.</p> <p>The Plan does not meet key points in the LPCS. The Plan has individually named and endorsed 18 windfall sites without stating that these sites are windfalls. An over-reliance on windfalls means that the opportunity for affordable housing is diluted and that the primary focus is not Burley Gate village (a 4.14 settlement in the LPCS). This will provide limited support for existing services. The wrong target for affordable housing has been cited.</p>	<p>The NDP’s approach to housing delivery has been developed on the basis of evidence provided through a Call for Sites, a Housing Site Assessment, consultation on site and settlement boundary options, discussions in the Steering Group and formulation of a Revised Housing Option. Table 1 of the NDP reflects the outcome of this work and shows how housing is to be delivered from a number of sources to more than satisfy the minimum requirements of the LPCS.</p> <p>A focus for discussion in the Steering Group was how best to address opportunities to deliver housing in the rural area (see paragraphs 5.8 and 5.9 of the Consultation Statement). A number of rural area sites were submitted to the Call for Sites. In June and July 2017, the Steering Group considered whether to incorporate those sites that had potential in an overall windfall allowance, or to identify them individually in the NDP – see notes of meetings:</p> <p>http://oclepychardgroup-pc.gov.uk/wp-content/uploads/2017/06/SG-Mtg-Notes-130617.pdf</p> <p>http://oclepychardgroup-pc.gov.uk/wp-content/uploads/2017/07/SG-Mtg-Notes-250717.pdf</p> <p>The favoured approach, to identify each site, recognises the potential capacity in the rural area as evidenced by the Call for Sites and where such sites are considered to be capable of supporting a residential use, either under LPCS policy RA3 or as a result of permitted development rights. They are mainly disused rural buildings. They will provide environmental benefits by making use of existing resources, reducing greenfield land take and in individual cases providing opportunities for enhancement.</p>

Summary of representation	Parish Council comment
	<p>As a result of the work undertaken to identify and assess potential housing sites throughout the Neighbourhood Area the NDP has been able to place only limited reliance on windfalls (four units).</p> <p>The allocation of land for new housing and a community shop at Burley Gate reflects its status as a “main focus” settlement within the LPCS. The proposal will maintain and strengthen the community by bolstering existing service provision, improving facilities and infrastructure and meeting the needs of the community, all as envisaged by LPCS policy RA2. The site is of sufficient size to require provision of affordable housing.</p> <p>Burley Gate is in the Hereford Northern and Southern Hinterlands housing value area, as confirmed by LPCS Figure 5.1 and where policy H1 prescribes a target of 35% affordable housing provision. This is correctly set out at para. 4.6 of the NDP.</p> <p>No concern has been raised by the LPA in respect of general conformity. Herefordshire Council comment that it is clear that the Plan takes a positive approach towards identifying settlement boundaries and allocating housing sites.</p>
<p>Representation by: Hunter Page Planning for Mr. David Abell.</p> <p>The draft NDP does not provide for the minimum housing target set by the LPCS due to an over-reliance on sites which may come forward under LPCS policy RA3 and so fails to meet the basic conditions. Land at Stone Farm, Felton would, if allocated, help to overcome the current shortfall. Two options are advanced under LPCS policy RA3 and allied policies: one for three self-build units, the other as a rural exception site</p>	<p>National and County planning policies allow residential development in the countryside in special circumstances, and there are permitted development rights for the change of use of agricultural buildings to dwellinghouses, subject to qualifying conditions and restrictions. The NDP makes an informed allowance for dwellings which may arise as a result of these provisions, as one component of the overall delivery of housing. This allowance reflects recent information on availability and landowner intentions as the locations concerned were identified through the Call for Sites. They will be subject to normal planning requirements.</p> <p>It is not accepted that the submission draft NDP does not demonstrate delivery of at least the minimum number of dwellings required by the LPCS. As stated above, no concern has been raised by the LPA in respect of general conformity on housing delivery or any other matter.</p> <p>Stone Farm is situated in open countryside away from any settlement identified in the LPCS for housing growth. The sites now advanced at Stone Farm were not brought forward in response to the Call for Sites or the consultation on the draft Plan, and at this late stage there is no requirement for further allocation in the NDP. Notwithstanding this, neither of the suggested options</p>

Summary of representation	Parish Council comment
<p>wherebt financial viability justifies the inclusion of an open market unit and three self-build units alongside four affordable units.</p>	<p>would meet strategic policy. Self-build is not one of the special circumstances defined in LPCS policy RA3 whereby residential development in rural locations outside of settlements may be acceptable, nor would this comply with national planning policy. As a rural exception site, the proposed equal split between the number of affordable and market units would exceed the concession in LPCS policy H2 and national planning policy that “<u>some</u> market housing may be permitted ... to subsidise a <u>significant proportion</u> of affordable housing” (policy H2, emphasis added). No information on financial viability has been provided to justify this proportion, as would be required by policy H2.</p>
<p>Representation by: Lucinda Ridgway.</p> <p>The revised southern boundary of the proposed site for new housing at Burley Gate will negatively impact on village character and landscape. Land east of the Primary School is more acceptable.</p>	<p>This representation refers to the fact that the southern boundary of the proposed housing site at Burley Gate, as originally formulated in the draft Plan, has been revised in response to consultation comments at Regulation 14 stage.</p> <p>The consultation on the draft Plan resulted in three site submissions coming forward at Burley Gate. One of these was an amendment in respect of the proposed site east of the Telephone Exchange, to extend the southern boundary; the others were for land which had not been included in the draft Plan. A Housing Site Assessment Addendum was prepared to assess these new and revised site submissions on a consistent basis. Landscape character and relationship to the settlement pattern and built form of the village were considered, and a comparative assessment undertaken of the two sites referred to by this representation (land east of the Telephone Exchange and land east of the Primary School). The Addendum concluded that the former should continue to be progressed in the NDP and that the latter should not.</p> <p>The NDP’s proposal for new housing at Burley Gate has been positively influenced by comments received to the draft Plan consultation including from Herefordshire Council (Development Management) and other Council service providers as well as the landowner. These comments and the changes made as a result are fully reported in the Consultation Statement.</p> <p>An outline planning application for development of the NDP site is now under consideration. This application was made on 4 May 2018 and is for 15 dwellinghouses (including 5 affordable) and community shop with all matters except access and layout reserved (LPA ref P181678/O). The application has been supported by the Parish Council. It awaits determination.</p>

Summary of representation	Parish Council comment
<p>Representation by: Michael Winston.</p> <p>We are pleased to see that the proposals submitted to the draft Plan consultation re land at Forge House, Burley Gate have not been included in the submission draft NDP. Concerned over the revised southern boundary for the land east of the Telephone Exchange which is not in keeping with the linear form of the village. Land east of the primary school has several benefits over the other sites. In summary the NDP acceptably represents parishioners' wishes to limit development at Burley to one site of 15 houses, to avoid excessive development which could overwhelm the existing village community.</p>	<p>This representation refers to the three new and revised sites at Burley Gate which were considered in the Housing Site Assessment Addendum.</p> <p>The support given in the representation for the non-inclusion of land at Forge House in the submission draft NDP is welcomed.</p> <p>In respect of the two other sites referred to (land east of the Telephone Exchange and land east of the Primary School), their respective merits were considered in the Addendum. This includes aspects of landscape character and their relationship to the settlement pattern and built form of the village. The Addendum concluded that the former should continue to be progressed in the NDP and that the latter should not.</p> <p>The NDP's proposal for new housing at Burley Gate has been positively influenced by comments received to the draft Plan consultation including from Herefordshire Council (Development Management) and other Council service providers as well as the landowner. These comments and the changes made as a result are fully reported in the Consultation Statement.</p>
<p>Representation by: Rev. Richard Allaway.</p> <p>The plan is flawed on grounds of sustainability and environmental impact. More development should be directed to Burley Gate to benefit and support the existing services and to enable more affordable housing. A</p>	<p>The Basic Conditions Statement explains how the NDP contributes to the achievement of sustainable development across its economic, social and environmental dimensions. Within the framework of national and strategic planning policy it is for the NDP to arrive at a locally appropriate set of policies and proposals based on evidence, technical advice and consultation. The LPA considers that the NDP is in general conformity with strategic policies. The allocation of land for new housing and a community shop at Burley Gate will maintain and strengthen the community by bolstering existing service provision, improving facilities and infrastructure and meeting the needs of the community, as envisaged by LPCS policy RA2. Affordable housing will be required.</p>

Summary of representation	Parish Council comment
significant number of windfall opportunities on rural sites in the open countryside are being proposed two of which are immediately adjacent to a Conservation Area.	In the rural areas, the recognition of potential capacity is based on evidence from the Call for Sites. Making use of this capacity will provide environmental benefits by using existing resources, reducing greenfield land take and providing opportunities for enhancement in individual cases. Proximity to a Conservation Area is not in itself a bar on development, suggesting instead that matters of character and appearance should be given particular attention.

DJN Planning Limited

July 2018

For Ocle Pychard Group Parish Council