

Latham, James

From: Turner, Andrew
Sent: 30 October 2018 14:26
To: Neighbourhood Planning Team
Subject: RE: Kington Area Regulation 16 neighbourhood development plan consultation

RE: Kington Area Regulation 16 draft Neighbourhood Development Plan

Dear Neighbourhood Planning Team,

I refer to the above and would make the following comments with regard to the above proposed development plan. It is my understanding that you do not require comment on Core Strategy proposals as part of this consultation or comment on sites which are awaiting or have already been granted planning approval.

Having reviewed Ordnance survey historical plans, I would advise the following with regard to the proposed development areas (indicated in brown) that are identified in **Plan 1: 'Proposed settlement boundary, proposed housing development sites & Kington Town proposed green spaces'**, **Plan 2: 'Proposed settlement boundary, proposed housing development sites & proposed green spaces for Hergest Road and Arrow View'** and **Diagram 1: 'Land South of Kington'**.

Plan 1: 'Proposed settlement boundary, proposed housing development sites & Kington Town proposed green spaces'

Policy KANP H1 - Housing Delivery: Kington Town:

Site K1:

- A review of Ordnance survey historical plans indicate a railway track (a potentially contaminative use) has historically run adjacent to the proposed site.

It is possible that unforeseen contamination may be present at the above mentioned sites. Consideration should be given to the possibility of encountering contamination as a result of its former use and specialist advice be sought should any be encountered during the development

Site K3:

- The proposed site is located on an area of land which has historically been used as a Gas Works, Petrol Station and builders yard. (all potentially contaminative uses).

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

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

a) a 'desk study' report including previous site and adjacent site uses, potential contaminants arising from those uses, possible sources, pathways, and receptors, a conceptual model and a risk assessment in accordance with current best practice

b) if the risk assessment in (a) confirms the possibility of a significant pollutant linkage(s), a site investigation should be undertaken to characterise fully the nature and extent and severity of contamination, incorporating a conceptual model of all the potential pollutant linkages and an assessment of risk to identified receptors

c) if the risk assessment in (b) identifies unacceptable risk(s) a detailed scheme specifying remedial works and measures necessary to avoid risk from contaminants/or gases when the site is developed. The Remediation Scheme shall include consideration of and proposals to deal with situations where, during works on site, contamination is encountered which has not previously been identified. Any further contamination encountered shall be fully assessed and an appropriate remediation scheme submitted to the local planning authority for written approval.

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

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

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

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

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

Technical notes about the condition

1. I would also mention that the assessment is required to be undertaken in accordance with good practice guidance and needs to be carried out by a suitably competent person as defined within the National Planning Policy Framework 2012.

2. And as a final technical point, we require all investigations of potentially contaminated sites to undertake asbestos sampling and analysis as a matter of routine and this should be included with any submission.

- Responsibility for securing safe development rests with the developer and/or landowner. It is incumbent on the developer and/or landowner to demonstrate that the proposed development is both safe and suitable for its intended use.

Site K5:

- A review of Ordnance survey historical plans indicate the proposed site is situated adjacent a former Textile manufacturer site.

It is possible that unforeseen contamination may be present at the above mentioned site. Consideration should be given to the possibility of encountering contamination as a result of its former use and specialist advice be sought should any be encountered during the development.

Diagram 1: Land South of Kington

Policy KANP H2- Housing Delivery: Land South of Kington (K6 and K7)

Site K6:

- A review of Ordnance survey historical plans indicate the proposed site is situated adjacent a former Builders Yard site.

It is possible that unforeseen contamination may be present at the above mentioned site. Consideration should be given to the possibility of encountering contamination as a result of its former use and specialist advice be sought should any be encountered during the development.

Plan 2: 'Proposed settlement boundary, proposed housing development sites & proposed green spaces for Hergest Road and Arrow View'

Policy KANP H3 - Housing Delivery: Kington Rural and Lower Harpton Group Parish:

Site: KH01

- The proposed site is located on an area of land which has historically been used as military land (a potentially contaminative use).

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

1. No development shall take place until the following has been submitted to and approved in writing by the local planning authority:
 - a) a 'desk study' report including previous site and adjacent site uses, potential contaminants arising from those uses, possible sources, pathways, and receptors, a conceptual model and a risk assessment in accordance with current best practice
 - b) if the risk assessment in (a) confirms the possibility of a significant pollutant linkage(s), a site investigation should be undertaken to characterise fully the nature and extent and severity of contamination, incorporating a conceptual model of all the potential pollutant linkages and an assessment of risk to identified receptors
 - c) if the risk assessment in (b) identifies unacceptable risk(s) a detailed scheme specifying remedial works and measures necessary to avoid risk from contaminants/or gases when the site is developed. The Remediation Scheme shall include consideration of and proposals to deal with situations where, during works on site, contamination is encountered which has not previously been identified. Any further contamination encountered shall be fully assessed and an appropriate remediation scheme submitted to the local planning authority for written approval.

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

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

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

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

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

Technical notes about the condition

1. I would also mention that the assessment is required to be undertaken in accordance with good practice guidance and needs to be carried out by a suitably competent person as defined within the National Planning Policy Framework 2012.

2. And as a final technical point, we require all investigations of potentially contaminated sites to undertake asbestos sampling and analysis as a matter of routine and this should be included with any submission.

- Responsibility for securing safe development rests with the developer and/or landowner. It is incumbent on the developer and/or landowner to demonstrate that the proposed development is both safe and suitable for its intended use.

General comments:

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

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

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

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

Kind regards

Andrew

Herefordshire.gov.uk

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

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



 Please consider the environment - Do you really need to print this e-mail?

Any opinion expressed in this e-mail or any attached files are those of the individual and not necessarily those of Herefordshire Council. This e-mail and any files transmitted with it are confidential and intended solely for the use of the addressee. This communication may contain material protected by law from being passed on. If you are not the intended recipient and have received this e-mail in error, you are advised that any use, dissemination, forwarding, printing or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please contact the sender immediately and destroy all copies of it.

From: Neighbourhood Planning Team
Sent: 03 October 2018 09:52
Subject: Kington Area Regulation 16 neighbourhood development plan consultation

Dear Consultee,

Kington Town Council, Kington Rural and Lower Harpton Group Parish Council and Huntington Parish Council have submitted their Regulation 16 Neighbourhood Development Plan (NDP) to Herefordshire Council for consultation.

The plan can be viewed at the following link:
https://www.herefordshire.gov.uk/directory_record/3072/kington_kington_rural_and_lower_harpton_group_and_huntington_neighbourhood_development_plan

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

The consultation runs from 3 October 2018 to 14 November 2018.

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

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

Kind regards

Herefordshire.gov.uk

Latham, James

From: Donotreply
Sent: 30 October 2018 17:25
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Mrs C
Last name	Giles
Which plan are you commenting on?	Kington area neighbourhood plan
Comment type	Objection
Your comments	<p>1 Housing - the major site proposed for Kington has too many houses all in one block again - contrary to what Kingtonians have asked for from the first consultations onwards - which was for small developments.</p> <p>2 So - Kington development area - I had not truly understood the question about this in the previous questionnaires and the impact it would have on 1 Housing above. I have heard a few friends say they hadn't understood that either. Having read the supporting rationale for limiting the development zone I note that it is based largely on findings in the past. Surely we now need to be looking at the current feedback and to the future, and extend it so that the housing can indeed be in small developments in other parts of the town rather than extending what is already a large development.</p> <p>3 Infrastructure - improvements to Kington must be made BEFORE extra stress is added by increased housing/population - necessary support services returned to Kington, schooling, medical staff (including dentists and chemists), police, all social services and council information officers returned to Kington (Leominster is not accessible unless people drive or can afford to) etc etc and provided by people not just computers - they do not do the necessary job. But more to the point, improve the water/sewage urgently and ahead of developments.</p> <p>4 Type of housing - does it really reflect the requirements of the population, current and forecastable - a) for retired people b) for self-employed people</p>

(live-work units)? I am glad to see affordable housing is mentioned, but am not sure if it is specified as a requirement of any development adequately to ensure it actually happens, rather than just more 3-4 bed executive housing. I would wish to see a) and b) specified too. 5 Housing environmental impact - I am very supportive of requiring for any new project photovoltaic panels, solar thermal panels, eco insulation, green spaces to provide lungs to the town and new eco materials - to the benefit of the individuals and the town/area.



The Coal
Authority



200 Lichfield Lane
Berry Hill
Mansfield
Nottinghamshire
NG18 4RG

Tel: 01623 637 119 (Planning Enquiries)

Email: planningconsultation@coal.gov.uk

Web: www.gov.uk/coalauthority

For the Attention of: Neighbourhood Planning and Strategic Planning
Herefordshire Council

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

02 November 2018

Dear Neighbourhood Planning and Strategic Planning teams

Kington Area Neighbourhood Development Plan - Submission

Thank you for consulting The Coal Authority on the above.

Having reviewed your document, I confirm that we have no specific comments to make on it.

Should you have any future enquiries please contact a member of Planning and Local Authority Liaison at The Coal Authority using the contact details above.

Yours sincerely

Christopher Telford BSc(Hons) DipTP MRTPI
Principal Development Manager

Rec'd
13/11/18

Neighbourhood Planning Team,
Planning Services,
P.O. Box 4,
Hereford,
HR1 2ZB

12th November 2018

RE: Kington Area "Neighbourhood" Plan
Consultation Period.

Dear Neighbourhood Planning Team,

We understand that the Regulation 16 Consultation Period is running until Wednesday 14th November and would like to make our comments known on the Kington Area Neighbourhood Plan.

We have a problem with the procedures adopted.

There has been a lack of communication to the Kington Residents throughout the process and decisions have been made by only a few Steering Group members which will affect a considerably large number of residents. These members live nowhere near the allocated sites and so it cannot be classed as a Neighbourhood Plan.

A volunteer group consisting of the majority of Headbrook/Bridge Street residents opposing any development on the original K10 site (now GS06). Although this area was specified in the SHLAA 2011 report as land suitable for 30+ houses and private plans have been publically known prior to the Neighbourhood Plan commencement. The Chairman/now Mayor decided that this area was not allowed to be discussed within the housing plan!??

It is also commonly known locally that there are potential plans for the land originally shown as K18 and possibly K19 along the A4111. However, this area was also rejected from discussion.

The whole process has been unfairly loaded against residents who will be affected. Boundary Lines have been changed in effect by two people for their personal preferences.

Decisions have been made but **Kington Residents have not been able to ask the Consultants how they reached their conclusions.** We have had to accept these supposed reports from the Mayor and a former Councillor. Surely it should be part of a democratic process that the reasons are given by the consultants who presumably made the decisions.

On checking minutes, it appears that MF and RB have met these consultants and **NOT** the remaining members of the Town Council and **CERTAINLY NOT** any Kington residents. **We have NOT been involved with the process!**

Residents had pressed for a Public Meeting to discuss K12/K13 (now K6/K7) This showed a 100% vote against 100+ large house building. Yet, the Neighbourhood Plan has continued to include this area. So much for the ridiculous statement -Planning has just got more Local! People have made decisions who live nowhere near the sites outlined. [REDACTED]

We have noted contents in the CPRE booklet “ How to shape where you live:a guide to neighbourhood planning”

A Neighbourhood Plan cannot be used to prevent development (originally K10 + K18) **(IT HAS)**

You will need to involve other people who may not agree with your views. It will require your community to reach a broad consensus on the objectives, key issues and desired outcomes.**(IT HAS NOT)**

A Neighbourhood Plan should help your community come together. **(IT HAS NOT)**

Don't just contact those people who you know or you think will agree with your views. **(THEY HAVE)**

Make sure the whole community is aware of the Neighbourhood Plan. **(THEY HAVE DEFINITELY NOT)**

It is essential that the content of your Neighbourhood Plan represents the views of the wider community, not just those of the project group.**(IT DOES NOT)** In fact views expressed have been totally ignored!

Before completing your Neighbourhood Plan, it is recommended that you carefully check it to make sure that what you are proposing stands a realistic chance of actually happening.**(HAS IT?- WE BELIEVE IT DOES NOT!)**

Although a parish or town council may want to include only the area it covers, the boundary of the Neighbourhood Plan of the Neighbourhood Plan area can be extended if this is justified and agreed with the adjoining parish or town council.

THE MAYOR ADAMANTLY IGNORED THIS POINT AND SAID THAT IT WAS INCORRECT! A LANDOWNER HAD OFFERED LAND WITH BETTER ACCESS AND VIEWED BY MANY AS A MORE SUITED SOLUTION - BUT IT WAS NEVER DISCUSSED!!

This is an important point linked to the access to K12/K13 now K6/K7.

We detail information concerning a past REFUSAL OF PLANNING PERMISSION and PLANNING CONDITIONS stipulated within the plans for Kington Park and also RESTRICTIVE

COVENANTS within the transfer of land by J.S. BLOOR (Tewkesbury) and HEREFORDSHIRE COUNTY COUNCIL on 10th April 2013.

THESE FACTS HAVE BEEN IGNORED BY THE MAYOR/CHAIRMAN, Mr Martin Fitton and former Councillor Ros Bradbury.

We also have a major issue should the Kington Area Neighbourhood Plan progress to a Referendum stage. This would result in a non democratic overall yes vote loaded in the favour of MF and RB who have compiled the plan.

The 'AREA' has been designated to now include Huntington, Kington Rural and Lower Harpton residents. Whilst these residents may be happy to vote yes to their Plan, we do not understand why they should vote on Kington Housing when they have no connection with it. The Kington Town Councillors will have to tow the line with a yes vote and the question on the Referendum will be loaded as seen with past experiences associated with a Kington questionnaire.

We propose that a fairer and more democratic way would be for Huntington, Kington Rural and Lower Harpton residents to vote on their Neighbourhood Plan whilst Kington would be considered separate and Kington Residents will vote on their own Neighbourhood Plan. This is the democratic way to ensure that any final vote is not weighted against Kington residents especially in the K6/K7 vicinity.

The Town Council minutes show attendances by Kington Councillors have been minimal at meetings where important decisions were made against the wishes of the Kington public. We call for a total reappraisal of the Kington Neighbourhood Plan and a Public Hearing involving an Independent Examiner.

Finally, a selection of comments made on yellow slips linked to the Neighbourhood Plan by concerned Kington residents included:

Why are people with excessive land protected by boundary lines?

Why is all of this area protected? Is it because it is owned by local Councillors ?

Absolutely, 2nd, 3rd and 4th this!!

Entrance from old Eardisley Road is totally Inadequate!

If you want Tourism - you need to preserve the countryside. That will bring them!

How can you value the environment if you build all over it?

I.e. Do not impact on the properties belonging to Councillors!

Why has K12/K13 now K6/K7, risen to 100+ houses?

There are many empty properties in Kington that could be refurbished and brought into use.

NO!!!!

High quality landscape throughout the Kington area. Were the various consultations known to all interested residents?

Something is rotten in the state of KINGTON!!

What Consultations? The questionnaire which seems to have been largely ignored OR the standing room only Public Meeting comments - which have been TOTALLY IGNORED.

Small Developments ????? not a large estate then

WHO said 200+ homes are required - NOT KINGTON!! And not on large green fields either.

Why is the Turner's proposed development not mentioned? The Council know all about it and Kington citizens approved of it.

NOT Round this site K12/K13 (now K6/K7)!!!!

PLEASE RECONSIDER THIS "MADNESS"!!!

200 Houses!! NO Services. NO Doctors. Inadequate Sewerage Poor Road Links. NO 6th Form provision.No Banks. HAVE WE REALLY THOUGHT THIS THROUGH!!

Who do you think you are kidding Mr Fitton?

Where do our Councillors live? (Nowhere near any of the proposed sites!)

Homes for Kington people?? Or to commute to Hereford!

IF planning is more local, why have these decisions been made? We would not have moved here 2 years ago to see this local pretty town overwhelmed.

We have photos of all these yellow slip responses from the Library which may not have appeared within the Neighbourhood Plan. The vast vast majority of comments were **AGAINST** this Neighbourhood Plan.

There are so many further objective points to mention against this so called Neighbourhood Plan but having only just been made aware of the Consultation time is limited to respond

IS THE KINGTON AREA PLAN THEREFORE DELIVERABLE?

The publicity of all stages of the Neighbourhood Plan has been TOTALLY INADEQUATE? Walking around Kington recently, residents would have been well aware of a Firework Night, a Christmas Fayre at the Golf Club, Kington Food Festival, a Concert at Lady Hawkins School and Events being held leading to Remembrance Sunday. This was because prominent posters, leaflets and displays were well allocated easily seen in Kington.

*****This cannot be said for bringing the resident's attention to the extremely important Consultation period with Herefordshire Council.*****

From,
Extremely Concerned Kington Residents.*

*Because of the lack of notification for the current Regulation 16 Consultation period, many Kington residents who oppose the Neighbourhood Plan but had not seen that it ends this

Wednesday! We are in the process of collecting names to link to this objection and will forward these to you, but it is hoped that all the points will be taken into account within the Consultation.



Campaign to Protect
Rural England
Standing up for your countryside

How to shape where you live: a guide to neighbourhood planning

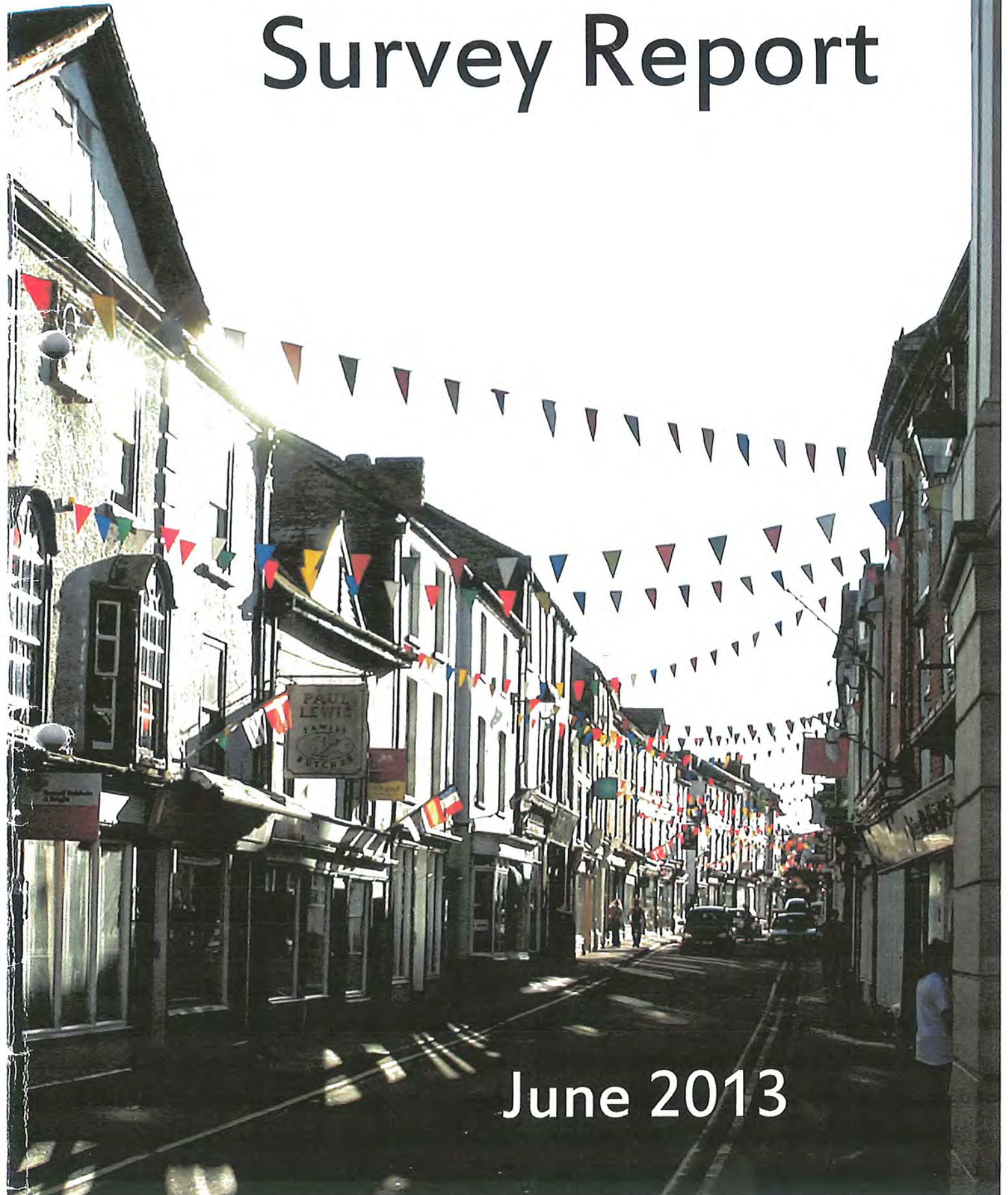


In partnership with



Kington Local Action Plan

Survey Report



June 2013

KINGTON AREA NEIGHBOURHOOD PLANNING

A Kington Local Action Plan Survey Report was published in June 2013 and contained information based on an informal questionnaire.

Extracts from this Report are detailed:

The results of Kington Action Local Plan survey will help the Town Council when it makes a Neighbourhood Development Plan. The NDP will influence such issues as where houses should be built!

3 HOUSING:

Ensure views about the development type are reflected in the Neighbourhood Development Plan.

There was .. little support for further large housing estates or the provision of more flats.

Where would you like to see new housing built?

On redundant sites.	67.4%
In small clusters.	43.5%

In larger estates. 2.5% !!!

It also suggested Renovating Existing buildings.

******COMMENT: WHAT APPEARS IN THE NEIGHBOURHOOD PLAN . 100+ HOUSES IN LARGER SITES K6/K7 ******

10 THE COMMUNITY:

It is interesting to note that most people rely on Posters in shop windows or word of mouth to find out what is going on in Kington.

Where do you find out about what is going on around the town?

Posters in Shops:	75% ish
Word of Mouth:	70% ish
Kington Chronicle:	45% ish
Parish News:	45% ish
Newspapers:	35% ish

Websites: 05% ish

****** COMMENT: HOW HAS THE NEIGHBOURHOOD PLAN BEEN PUBLICISED - ON ITS' WEBSITE!!! ******

Those few persons responsible for the Kington Neighbourhood Plan have therefore chosen the exact **OPPOSITE** policies to those preferred in this survey. I.e. **LARGER SITES and on IT'S RARELY UPDATED WEBSITE**

We have not seen blanket poster displays or deliveries at all stages and many many people do not know the details of the Kington Area Neighbourhood Plan. This especially applies to residents of Kington Park and those living in the vicinity(Old Eardisley Road, Banley Drive, Black Barn Close, etc) who will be greatly affected by K5/K7

This also applies to the Herefordshire Council letter notifying of the Consultation Period from 3rd October - 14th November 2018.

Usually, with Planning Applications/Notifications, notices are shown on lamp posts next to the affected area for residents to view. Up until at least 26th October nothing was placed on the Kington Park Notice board (one displayed on Tuesday 6th November after email to council on 26th October)

Nothing has been posted on any lamp post along Old Eardisley Road, Banley Drive, Black Barn Close whose residents could be greatly inconvenienced with traffic congestion. There are understandable road safety issues with this access to K6/K7.

!!!THEY HAVE IN EFFECT BEEN DISENFRANCHISED BY NOT KNOWING OF THE CONSULTATION PERIOD!!!

KINGTON AREA NEIGHBOURHOOD PLAN OBJECTIONS.

IS THIS NEIGHBOURHOOD PLAN DELIVERABLE?

ACCESS TO MAIN SITES (100+ Houses) - Originally K12/K13 now K6/K7

A) In September 2009, a Planning Application for further access to the rear of Ian Jones Tyres from Old Eardisley Road was refused by Hereford Planning Services.

The reasons for this refusal are shown on the letter. i.e. Allocated for open space, proposed development will have a detrimental impact and fails...appropriate visibility splays...to maintain ... highway safety standards.

B) The map shows the land acquired by J.S. Bloor (Tewkesbury) and their plan prior to the building of Kington Park. It clearly shows the Public Open Space, public footpath and informal recreation and play area that exists now.

This included a specification (7.6)

"Provision of Public open space for the local community in the northern fifth of the site. This will be a multifunctional area including access for walking, informal walking and improved biodiversity. A footpath and ? Will increase the amenity value where currently there are no public rights of way. Introducing areas of trees.....

(7.7) ...children's play area.....

C) There was a transfer of land in April 2013 from J.S. Bloor to the County of Herefordshire District Council. A restrictive covenant was detailed within this document.

Kevin Haynes, Land Director for Bloor Homes has recently verbally advised that this states No Building, Retain Public Open Space and amenities i.e. as per original plans and what exists now in 2018.

D) The map shows the transferred land to The County of Herefordshire outlined in red. There is therefore a possibility that any future plan may well use the southern access route onto the original K12/K13 now K6/K7

IS THIS KINGTON NEIGHBOURHOOD PLAN DELIVERABLE? DEFINITELY NOT!!

Diagram 1: Land South of Kington



K6/K7



**Town and Country Planning Act 1990
Planning and Compensation Act 1991**

REFUSAL OF PLANNING PERMISSION

Applicant:

Mr Ian Jones
30 Headbrook
Kington
Herefordshire
HR5 3AY

Agent:

Andrew Last
Brookside Cottage
Knapton Green
Birley
HR4 8ER

Date of Application: 16 September 2009

Application No: DMNW/092216/F

Grid Ref:330035:256306

Proposed development:

SITE: Unit 2, 18b Headbrook, Kington, Herefordshire, HR5 3DZ
DESCRIPTION: Change of use of land to car parking and access drive.

THE COUNTY OF HEREFORDSHIRE DISTRICT COUNCIL hereby gives notice in pursuance of the provisions of the above Acts that PLANNING PERMISSION has been REFUSED for the carrying out of the development described above for the following reasons:

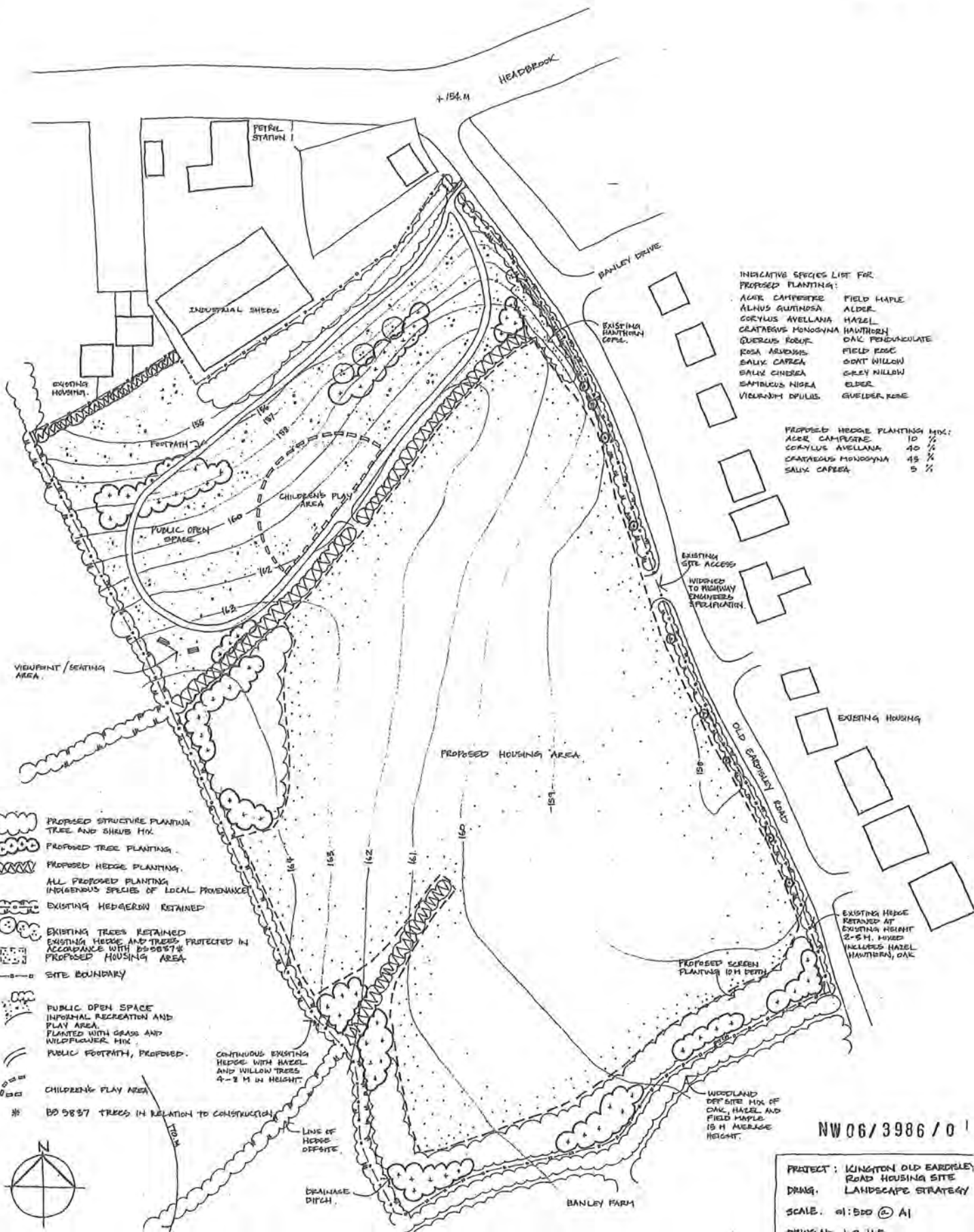
- 1 The application represents a proposal for development on land allocated as open space in relationship to housing development in accordance with the Herefordshire Unitary Development Plan and as such the proposal is considered contrary to Policies S8 and HBA9 of the Herefordshire Unitary Development Plan.
- 2 It is considered that the proposed development will have a detrimental impact on the amenity of the adjacent dwelling to the application site, and as such the proposed development is considered contrary to Policy DR2 of the Herefordshire Unitary Development Plan.
- 3 The proposal fails to demonstrate that appropriate visibility splays can be provided in order to maintain satisfactory highway safety standards. Therefore the proposal is considered contrary to Policies S6 and DR3 of the Herefordshire Unitary Development Plan.

Planning Services
PO Box 230,
Hereford,
HR1 2ZB

Date: 11 November 2009


Team Leader North

YOUR ATTENTION IS DRAWN TO THE NOTES OVERLEAF



INDICATIVE SPECIES LIST FOR PROPOSED PLANTING:

ACER CAMPESTRIS	FIELD MAPLE
ALNUS GLUTINOSA	ALDER
CORYLUS AVELLANA	HAZEL
CESTRAEUS MONOSYNA	HAWTHORN
QUERCUS ROBUR	DAK PENICILLATE
ROSA ARUNDINACEA	FIELD ROSE
SALIX CAPREA	OSHT WILLOW
SALIX CINREA	GREY WILLOW
SAMBURUS NIGRA	ELDER
VIBURNUM DPULIS	GUELDER ROSE

PROPOSED HEDGE PLANTING MIX:

ACER CAMPESTRIS	10 %
CORYLUS AVELLANA	40 %
CESTRAEUS MONOSYNA	45 %
SALIX CAPREA	5 %

- PROPOSED STRUCTURE PLANTING TREE AND SHRUB MIX
- PROPOSED TREE PLANTING
- PROPOSED HEDGE PLANTING
- ALL PROPOSED PLANTING INDIGENOUS SPECIES OF LOCAL PROVENANCE
- EXISTING HEDGEROW RETAINED
- EXISTING TREES RETAINED EXISTING HEDGE AND TREES PROTECTED IN ACCORDANCE WITH BS5837# PROPOSED HOUSING AREA
- SITE BOUNDARY
- PUBLIC OPEN SPACE INFORMAL RECREATION AND PLAY AREA PLANTED WITH GRASS AND WILDFLOWER MIX
- PUBLIC FOOTPATH, PROPOSED
- CHILDREN'S PLAY AREA
- # BS 5837 TREES IN RELATION TO CONSTRUCTION



NW 06 / 3986 / 0 1

PROJECT : KINGTON OLD EARDISLEY ROAD HOUSING SITE
 DRAWG. LANDSCAPE STRATEGY
 SCALE. 1:100 @ A1
 DRAWG No. 1.2.11B.
 DATE. 20.11.06

Sarah Kemp B.A., D.P.L.A., F.R.S.
 Landscape Architect
 Tels 01453 609723 E-Mail sarah@palslandscapes.co.uk

NW 06 / 3986 / 0

7 Landscape Design Strategy

The Landscape Design Strategy is illustrated in drawing 1.211 A. All the existing trees and hedgerows around the site would be retained and in some areas enhanced by new tree and shrub planting. The choice of plant species for use in the landscape proposals will reflect the local character. The naturalistic form of the proposed tree belts, copses and shrubbery would be carefully designed to be sympathetic to the size and scale of similar local features in the surrounding rural landscape. The proposed housing layout should reflect the existing residential development of Headbrook.

The Landscape strategy for this housing development include the following mitigation proposals to reduce the negative impact of the development on the landscape. These proposals are also to enhance the Landscape and to be sensitive to the existing Landscape character.

- 7.1 Sensitive location of the development within the site. The housing area shown on the Landscape Strategy plan is located away from raised bank to the north facing the town. This proposal will reduce the visual impact of the development from view points on Bradnor Hill to the north and Hergest Ridge to the North west.
- 7.2 Planting to reinforce existing landscape character would include proposed hedgerows on the northern boundary and hedge planting within the area of housing. The proposed hedges are to be of mixed species indigenous to the area and of local provenance. Hedgerow trees are to be planted at random spacing along the hedges to reflect the existing vegetation.
- 7.3 Retaining all the existing hedgerows along the site boundary and protecting them during construction according to BS 5837 'Trees in relation to construction' and preparing a management strategy for the hedges and trees to assure their future maintenance. The proposed site entrance will be located at the existing gateway to limit damage to the Old Eardisley Road hedge. The proposed housing area has been carefully located to ensure that all significant tree cover and hedgerows would be retained where possible. This principle provided a starting point for the structural design of the scheme.
- 7.4 Enhancement of the existing hedgerow along the Old Eardisley Road and the western boundary with intermittent planting of standard trees. The existing mature hedgerow on the eastern boundary along the Old Eardisley Road would be retained and kept to a height of at least 2 metres to maintain some privacy between properties.
- 7.5 Screen or structure planting around the housing area shown on the Landscape strategy plan.(refer to drwg. 1.211) This planting is to be predominately trees with shrubs again of indigenous species of local provenance. The planting will reduce the visual impact of the housing from viewpoints off site. Areas of screen planting include a ten metre width along the southern and south western boundary with Banley Farm and in the area of proposed public open space to the north. These proposals will increase the biodiversity on site by creating more wildlife habitat.
- 7.6 Provision of Public open space for the local community in the northern fifth of the site. This will be a multifunctional area including access for walking , informal recreation and improved biodiversity. A footpath and will increase the amenity value where currently there are no pub-

HERSFORD DISTRICT COUNCIL
DEVELOPMENT CONTROL
18 DEC 2006
To: Kington Housing Site
APR 06 12.4

lic rights of way. Introducing areas of trees , shrubs and retaining the existing hedgerows will enhance biodiversity and reinforce the existing landscape character.

- 7.7 Provision of a children's play area for small children within the public open space to benefit residents of the Headbrook area.

NW 06 / 3986 / 0



C

Title number HE48997

C: Charges Register continued

9 October 2009 made between (1) J S Bloor (Tewkesbury) Limited and (2) Central Networks West Plc.

The said Deed also contains restrictive covenants by the grantor.

-NOTE: Copy filed under HW100534.

- 2 (10.04.2013) A Transfer of the land in this title dated 4 April 2013 made between (1) J S Bloor (Tewkesbury) Limited and (2) The County of Herefordshire District Council contains restrictive covenants. *

-NOTE: Copy filed.

End of register

HM Land Registry
Official copy of
title plan

Title number **HE48997**
Ordnance Survey map reference **SO3056SW**
Scale **1:1250 enlarged from 1:2500**
Administrative area **Herefordshire**



© Crown copyright and database rights 2013 Ordnance Survey 100026310. You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form.



Latham, James

From: Ian Caney
Sent: 14 November 2018 16:39
To: Neighbourhood Planning Team
Subject: Neighbourhood Planning Team

RE: Kington Neighbourhood Consultation Period.

Would you please add the following names to the written comments submitted to the Council Office on 13th November 2018. (Receipt 74)

Jill Synnock
David Skyrme
Laura Skyrme
Georgina Synnock
Russell Synnock
Elizabeth Synnock
Lynden Synnock
Claire Synnock
Gill Simcock
I. Caney
J. Caney
S. Caney
R. Caney
A. Borg
M.Neville
E. Neville
E.Neville
T.Neville
N. Ellin
S. Ellin
M.Osborne
W.Osborne
R.Pitman
P.Pitman
H.Osborne
M.Dalsgaard
D.Osborne
D.McAdam
T.McAdam
R.Polhill
S.Polhill
L.Polhill
B.Polhill
N.Lane
D.Lane
A.Taylor
M.Tayor
K.Durkin
J.Durkin
M.Cheshire
C.Alexander
A.Alexander

A.Mulnier
R.Mulnier
B.Mulnier
G.Mulnier
C.Youings
M.Youings

Other names will follow to add to the list and submission, when local residents are aware of this consultation.

Thank you.

Sent from my iPad

Latham, James

From: Norman Ryan <Ryan.Norman@dwrwymru.com>
Sent: 09 November 2018 14:11
To: Neighbourhood Planning Team
Subject: RE: Kington Area Regulation 16 neighbourhood development plan consultation
Attachments: DCWW consultation response - NDP Land south of Kington - 26 08 16.pdf; RE: Kington Area Neighbourhood Plan

Dear Sir/Madam,

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

As you may be aware, we were previously consulted by Herefordshire Council and the Parish Council on the earlier stages of the NDP process. As such, we have no further comment to make.

I attach our previous correspondence on this matter for your consideration.

Should you require any further information, then please let me know.

Kind regards,



Ryan Norman
Forward Plans Officer | Developer Services | Dwr Cymru Welsh Water
Linea | Cardiff | CF3 0LT | T: 0800 917 2652 | www.dwrwymru.com

We will respond to your email as soon as possible but you should allow up to 10 working days to receive a response. For most of the services we offer we set out the timescales that we work to on our Developer Services section of our website. Just follow this link <http://www.dwrwymru.com/en/Developer-Services.aspx> and select the service you require where you will find more information and guidance notes which should assist you. If you cannot find the information you are looking for then please call us on 0800 917 2652 as we can normally deal with any questions you have during the call.

If we've gone the extra mile to provide you with excellent service, let us know. You can nominate an individual or team for a Diolch award through our [website](#).

From: Neighbourhood Planning Team [mailto:neighbourhoodplanning@herefordshire.gov.uk]
Sent: 03 October 2018 09:52
Subject: Kington Area Regulation 16 neighbourhood development plan consultation

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

Dear Consultee,

Kington Town Council, Kington Rural and Lower Harpton Group Parish Council and Huntington Parish Council have submitted their Regulation 16 Neighbourhood Development Plan (NDP) to Herefordshire Council for consultation.

The plan can be viewed at the following link:

https://www.herefordshire.gov.uk/directory_record/3072/kington_kington_rural_and_lower_harpton_group_and_huntington_neighbourhood_development_plan

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



Forward Planning
PO Box 3146
Cardiff
CF30 0EH

Tel: +44 (0)800 917 2652
Fax: +44 (0)2920 740472
E.mail: Forward.Plans@dwrcymru.com

Cynllunio Ymlaen
Blwch Post 3146
Caerdydd
CF30 0EH

Ffôn: +44 (0)800 917 2652
Ffacs: +44 (0)2920 740472
E.bost: Forward.Plans@dwrcymru.com

Siobhan Riddle
Strategic Planning – Herefordshire Council

Enquiries: Rhys Evans/Ryan Norman
0800 917 2652

Sent via email

26th August 2016

Dear Siobhan,

MASTERPLAN FOR PREFERRED SHLAA SITES IN KINGTON: K12 & K13, LAND SOUTH OF KINGTON, UP TO 100 DWELLINGS – AUGUST 2016

I refer to your email dated the 10th August 2016 regarding the above consultation. Welsh Water appreciates the opportunity to respond and we offer the following representation:

Water supply

Given the size of the proposed development site and the small diameter distribution water main in the adjacent Kingswood Road, a hydraulic modelling assessment (HMA) of the water supply network may be required in order to understand where a connection can be made and if any upsizing is required.

Potential developers can commission Welsh Water to undertake a HMA, and fund any improvements via the Requisition provisions of the Water Industry Act 1991.

Public sewerage

There do not appear to be any issues in the proposed development site connecting into our combined public sewer in the adjacent Kingswood Road.

Wastewater treatment works (WwTW)

Our Kington WwTW is currently overloaded and there are no improvements planned within our current Capital Investment Programme (AMP6 – 1st April 2015-31st March 2020). An improvement scheme will form part of our submission to the Industry Regulators for the next Capital Investment Programme (AMP7 – 1st April 2020-31st March 2025).

As such, should a developer wish to progress this site in advance of our future Regulatory Investment they will need to fund the improvements themselves, firstly by commissioning Welsh Water to undertake a feasibility study of the WwTW, before entering into a Section 106 Agreement (of the Town & Country Planning Act 1990) to pay for the improvements required.

Green & Blue Infrastructure and Design Principles – Open Space

We welcome the inclusion of sustainable drainage systems within the proposed development site. Controlling and managing surface water discharges from new development sites by implementing sustainable drainage systems can minimise surface water run-off and flooding, and ensures no surface water connects to our public sewerage network and WWTW.

For further detail regarding land drainage, please contact the Land Drainage Department at Herefordshire Council.

We hope that the above information will assist as the NDP progresses. In the meantime, should you require any further information please do not hesitate to contact us at Forward.Plans@dwrcymru.com or via telephone on 0800 917 2652.

Yours sincerely,

Ryan Norman
Forward Plans Officer
Developer Services

Latham, James

From: Norman Ryan <Ryan.Norman@dwrcymru.com>
Sent: 09 November 2018 14:10
To: Norman Ryan
Subject: RE: Kington Area Neighbourhood PAn

From: Norman Ryan
Sent: 28 July 2017 10:56
To: Martin Fitton
Subject: FW: Kington Area Neighbourhood PAn

Dear Mr Fitton,

With regard to your below enquiry and our telephone conversation on Monday, I can confirm the following:

Our Core Strategy representation advised that the level of development proposed for Kington over the Core Strategy period to 2031 could not be accommodated without upgrading the wastewater treatment works (WwTW).

In considering the requirements for schemes to be included within our Capital Investment Programme (Asset Management Plan), we require some certainty in terms of growth and site development proposals. Information contained in Core Strategies and Neighbourhood Plans help guide where investment is required, subject to Regulatory approval from Ofwat and affordability. Other factors such as the current operation of the WwTW are also taken into account.

There are no upgrades planned for Kington WwTW within our current Capital Investment Programme AMP6 which runs from 1st April 2015 – 31st March 2020. We cannot give any guarantee that there will be a scheme in our next Capital Investment Programme AMP7 which runs from 1st April 2020 – 31st March 2025, but a scheme will certainly be put forward for consideration.

Should potential developers wish to progress a development site in advance of our future Regulatory Investment they will need to fund the improvements themselves, firstly by commissioning Welsh Water to undertake a feasibility study of the WwTW, before entering into a Section 106 Agreement (of the Town & Country Planning Act 1990) with Welsh Water and Herefordshire Council to pay for the improvements required.

Please note for your information I have attached my previous representation to Siobhan Riddle at Herefordshire Council on the proposed development at 'Land South of Kington' for 100 dwellings.

I hope that the above is useful to you and if you require any further information then please do not hesitate to contact me.

Kind regards,



Ryan Norman
Forward Plans Officer | Developer Services | Dwr Cymru Welsh Water
Linea | Cardiff | CF3 0LT | T: 0800 917 2652 | www.dwrcymru.com

We will respond to your email as soon as possible but you should allow up to 10 working days to receive a response. For most of the services we offer we set out the timescales that we work to on our Developer Services section of our website. Just follow this link <http://www.dwrcymru.com/en/Developer-Services.aspx> and select the service you require where you will find more information and guidance notes which should assist you. If you cannot find the

information you are looking for then please call us on 0800 917 2652 as we can normally deal with any questions you have during the call.

If we've gone the extra mile to provide you with excellent service, let us know. You can nominate an individual or team for a Diolch award through our [website](#).

From: Norman Ryan
Sent: 25 July 2017 12:48
To: 'Martin Fitton'
Subject: RE: Kington Area Neighbourhood PAn

Dear Mr Fitton,

No problem. You are correct – unfortunately as “.co.uk” was used rather than “.com” we didn't receive the previous consultation email.

With regard to your query, I will consult with colleagues and get back to you by the end of the week.

Kind regards,



Ryan Norman
Forward Plans Officer | Developer Services | Dwr Cymru Welsh Water
Linea | Cardiff | CF3 0LT | T: 0800 917 2652 | www.dwrcymru.com

We will respond to your email as soon as possible but you should allow up to 10 working days to receive a response. For most of the services we offer we set out the timescales that we work to on our Developer Services section of our website. Just follow this link <http://www.dwrcymru.com/en/Developer-Services.aspx> and select the service you require where you will find more information and guidance notes which should assist you. If you cannot find the information you are looking for then please call us on 0800 917 2652 as we can normally deal with any questions you have during the call.

If we've gone the extra mile to provide you with excellent service, let us know. You can nominate an individual or team for a Diolch award through our [website](#).

From: Martin Fitton
Sent: 25 July 2017 12:40
To: Norman Ryan <Ryan.Norman@dwrcymru.com>
Subject: Kington Area Neighbourhood PAn

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

Dear Ryan,

Thank you for your help this morning.

A consultation email was sent to Dwr Cymru, see below, but may not have arrived because we used .co.uk

As you know the Core Strategy indicates a maximum of 50 dwellings out of the 200 before the sewerage is up graded.

If as is probable there is no developer interest in the site by 2020 will this tend to push work down the pending tray?

I look forward to your further information.

Regards

Cllr Martin Fitton

----- Forwarded Message -----

Subject:Kington Area Neighbourhood Plan

Date:Fri, 16 Jun 2017 10:47:56 +0100

From:Martin Fitton

To:forward.plans@dwrcymru.co.uk

Bore da,

Kington Area Neighbourhood Plan. Regulation 14 submission and Consultation.(Neighbourhood Planning General Regulations 2012)

Our draft Plan has now been submitted to Herefordshire Council and we are now undertaking consultation with the statutory bodies and other interested organisations. The Consultation period begins on June 5th and concludes on July 17th 2017

The Plan with the Habitats regulation Assessment (HRA) and Strategic Environmental Assessment (SEA) can be viewed on the Herefordshire Council's website

[Kington Area Neighbourhood Plan](#)

It can also be seen on Kington Neighbourhood Plan Group's own website

[Kington Area Neighbourhood Plan](#)

along with all the consultants' reports that provide the evidence base for the Plan

[Kington Area Neighbourhood Plan. Consultants Reports](#)

The Plan covers Kington Town and two surrounding rural parishes Kington Rural & Lower Harpton and Huntington.

Any comments or suggested additions to the Plan should be sent to

The Town Clerk

Kington Neighbourhood Plan

Kington Town Council

The Old Police Station

2 Market Hall Street

Kington HR5 3DP

or clerk@kingtontowncouncil.gov.uk

If you require a printed version of the Plan or require any other help or information you can contact the town clerk as above and on 01455 239098.

We look forward to receiving your views

With Thanks

Cllr Martin Fitton Chair. Kington Area Neighbourhood Plan

Herefordshire Council
Neighbourhood Planning
Plough Lane
Hereford
HR1 2ZB

Our ref: SV/2018/109876/OR-
18/PO1-L01

Your ref:

Date: 08 November 2018

F.A.O: Mr. James Latham

Dear Sir

KINGTON AREA REG 16 NEIGHBOURHOOD PLAN

I refer to your email of the 3 October 2018 in relation to the above Neighbourhood Plan (NP) consultation. We have reviewed the submitted document and would offer the following comments at this time.

As part of the adopted Herefordshire Council Core Strategy updates were made to both the Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS). This evidence base ensured that the proposed development in Hereford City, and other strategic sites (Market Towns), was viable and achievable. The updated evidence base did not extend to Rural Parishes at the NP level so it is important that these subsequent plans offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period.

We previously raised concern on the Reg 14 submission with regards to sites located partially within Flood Zones 2 and 3, the medium and high risk zones respectively. Post Reg 14 consultation these sites have been subject to further discussion, including liaison with the Environment Agency, and we note that amendments have been made to the Reg 16 submission, specifically the removal of allocation K6.

The allocation on Land North of Arrow View has been retained although it is shown to fall partially within Flood Zone 2 of the River Arrow. Whilst it is recognised that the site could accommodate approximately 15 houses on land at a low risk of flooding any forthcoming planning application for residential development of this site will need to be accompanied by a Flood Risk Assessment, in line with National Planning Policy and your own Policy SD3, and this should be referenced within Policy KANP H3.

Environment Agency
Hafren House, Welshpool Road, Shelton, Shropshire, Shrewsbury, SY3 8BB.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

Yours faithfully

Mr. Graeme Irwin

Senior Planning Advisor

Direct dial: 02030 251624

Direct e-mail: graeme.irwin@environment-agency.gov.uk

End

2

KINGTON AREA NEIGHBOURHOOD DEVELOPMENT PLAN

In general I find this whole plan rather too much for Kington. The town layout and infrastructure is totally inadequate for all this extra development.

A certain amount of development is necessary for places to prosper but not at the risk of destroying the character of the town. In particular the proposed large development South of Kington I think is totally inappropriate. During the planning process for the Kington Park estate it was considered that the quantity of houses that could be accommodated on the available area would have a detrimental impact on the town. As a result the density was reduced, opening up more green space, and I see no reason why the same principle should not be applied in the case of this proposed development.

Another issue I find rather odd is that this development would have originally been outside the town's development boundary. My understanding was that this boundary is in place to prevent development sprawl over the adjacent countryside, but if it can be moved as and when our political servants think fit, without any consultation then what is the point of this boundary?

My final point and the most concerning is the access to this proposed development South of Kington. When the Kington Park estate gained planning permission, one of the conditions was that the green space north of the development would be protected from any future development. Now we see that the access to this proposed development would cut right through this protected green space removing a considerable area of wildlife habitat in the process.

Not only will habitat be lost but the extra traffic from these 100 proposed houses, with the prospect of 2 cars per property, will significantly impact on the Old Eardisley Road and Headbrook with all the health and safety issues it will create.

During various meetings it had been suggested that other alternatives for this access should be looked at but this request has been completely ignored.

Development is necessary but it has to be proportionate and sympathetic to the existing area. I feel as many others do that before any substantial development takes place in the Kington area a significant amount of infrastructure improvement needs to take place. It is complete folly letting development go ahead before this is done because as invariably happens once houses are in place other promised improvements rarely follow.



Mr G Bluett



(Please could you inform me of the planning authority's decision)



Neighbourhood Planning Team
Planning Services
PO Box 4
Hereford
HR2 2ZB

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

14th November 2018

Dear Sir/Madam,

This letter provides Gladman Developments Ltd (Gladman) representations in response to the submission version of the Kington Area Neighbourhood Plan (KANP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. Gladman requests to be added to the Council's consultation database and to be kept informed on the progress of the emerging neighbourhood plan. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy.

Legal Requirements

Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the KANP must meet are as follows:

- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.*
- (d) The making of the order contributes to the achievement of sustainable development.*
- (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.*

Revised National Planning Policy Framework

On the 24th July 2018, the Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework. The first revision since 2012, it implements 85 reforms announced previously through the Housing White Paper.

Paragraph 214¹ of the revised Framework makes clear that the policies of the previous Framework will apply for the purpose of examining plans where they are submitted on or before 24th January 2019. Given the date of this consultation, the comments below reflect the relationship between Neighbourhood Plans and the National Planning Policy Framework adopted in 2012.

National Planning Policy Framework (2012) and Planning Practice Guidance

The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet development needs.

At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account the latest and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.

The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.

Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

Planning Practice Guidance

It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The

¹ National Planning Policy Framework, paragraph 214

requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).

On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.

On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.

Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is with that in mind that Gladman has reservations regarding the KANP's ability to meet basic condition (a) and (d) and this will be discussed in greater detail throughout this response.

Relationship to Local Plan

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

The adopted development plan relevant to the preparation of the Kington Area Neighbourhood Plan area, and the development plan which the KANP will be tested against is the Herefordshire Core Strategy (HCS). This document was adopted in October 2015 and sets out the visions, objectives, spatial strategy and overarching policies to guide development in the Herefordshire from 2011 – 2031.

Policy SS2 sets out a minimum requirement of 16,500 homes that will be delivered over the plan period. Policy KG1 of the HCS stipulates that Kington will accommodate 200 dwellings over the plan period that will come forward as allocations in a neighbourhood plan. It is imperative that the KANP supports this quantum of development accordingly to ensure the plan meets basic conditions (e).

Policy SS3 determines that where housing completions fall below the annual requirement this could lead to one of the following mechanisms being introduced;

- a partial review of the Local Plan,
- preparation of new Development Plan Documents or,
- utilising evidence from the Strategic Housing Land Availability Assessment to identify additional housing land.

With this in mind and given that Herefordshire Council cannot demonstrate a 5-year supply, Gladman suggest sufficient flexibility is provided in the policies of the plan to safeguard the KANP from conflicting with future development proposals should they be required.

Kington Area Neighbourhood Plan

This section highlights the key issues that Gladman would like to raise with regards to the content of the KANP as currently presented. It is considered that some policies do not reflect the requirements of national policy and guidance and as such Gladman have sought to recommend a series of alternative options that should be explored.

As a general comment, Gladman suggest a slight alteration to the overall wording of the KANP. Where reference is made to 'protecting and enhancing' we suggest amending to read 'conserved and enhanced'. This ensures the plan aligns with core planning principles of the previous Framework.

Policy ENV1 – A Valued Natural Environment

Policy 1 seeks to ensure that the natural environment of the Kington Area is conserved and enhanced.

Criterion (ii) of the policy requires important open spaces, views and landscape qualities to be protected. As a general point Gladman are concerned with the wording of this policy as currently drafted. Whilst we agree that local landscape should be recognised there is no requirement in the previous Framework for this to be protected and this would be a consideration in the planning balance when considering a development proposal.

With regards to the views, Gladman submit that new development can often be located in areas without eroding the views considered to be important to the local community and can be appropriately designed to take into consideration the wider landscape features of the surrounding area to provide new vistas and views.

In addition, as set out in case law, to be valued, a view would need to have some form of physical attribute. This policy must allow a decision maker to come to a view as to whether particular locations contains physical attributes that would 'take it out of the ordinary' rather than selecting views which may not have any landscape significance and are based solely on community support.

Opinions on landscape are highly subjective yet Gladman have been unable to locate any robust evidence to demonstrate why these views and landscape areas are considered special. The Town Council should address the lack of evidence and reasoning to support policy ENV1.

Policy SB1 – Settlement Boundaries: Kington Town and Hergest

Policy SB1 notes appropriate development will be directed to sites that fall within the identified settlement boundaries.

The use of a settlement boundary to preclude otherwise sustainable development from coming forward does not accord with the positive approach to growth required by the previous Framework and is contrary to basic condition (a). Given that there is a shortfall of housing across the authority we suggest the policy is caveated, so that it supports sustainable development opportunities adjacent to the settlement boundary. This would ensure the KANP could respond to proactively to any of the mechanisms identified under policy SS3 of the HCS, and as noted in paragraph 4.4.3 of the HCS.

Policy H5 – Housing Design Criteria

Policy H5 sets out thirteen design criteria that all development proposals will be measured against.

Gladman are concerned that some of the criterion in the policy are overly prescriptive and could limit suitable sustainable development coming forwards. Gladman suggest more flexibility is provided in the policy wording to ensure high quality residential developments are not compromised by overly restrictive criteria. We suggest regard should be had to paragraph 60 of the previous Framework which states that;

“Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles”

Moreover, Gladman suggest deleting the reference to ‘The Greater London Authority Space Standards (2006)’. This document was commissioned to inform a review of the London Plan and consequently influenced by the unique characteristics of the urban areas of London. To apply these requirements to the distinctly rural area of Kington would be impractical.

Policy LGS1 – Local Green Spaces

Policy LGS1 seeks to designate 26 parcels of land as Local Green Spaces (LGS) which will be protected from development.

Gladman would like to remind the Town Council that the designation of land as LGS is a significant policy designation and once designated effectively provides protection that is comparable to that of Green Belt land. Paragraph 77 of the previous framework explicitly states, ‘Local Green Space designation will not be appropriate for most green areas or open space’. Accordingly, it is imperative that the plan-makers can clearly demonstrate that the requirements for LGS designation are met. The designation should only be used;

- Where the green space is in reasonably close proximity to the community it serves
- Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife
- Where the green area concerned is local in character and is not an extensive tract of land

Gladman do not consider the evidence contained within the supporting text of the policy is robust or detailed enough to justify the designation of the identified parcels as LGS. We consider that many of the proposed LGS are little more than extensive tracts of land. The Town Council must ensure the proposed designations are capable of meeting the requirements of national policy and that the designations are justified by robust and detailed evidence.

Conclusions

Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the KANP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.

Gladman is concerned that the plan in its current form does not comply with basic conditions (a) and (d). The plan does not conform with national policy and guidance and in its current form does not contribute to the achievement of sustainable development.

Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.

Yours Faithfully,

Andrew Collis

a.collis@gladman.co.uk

Gladman Developments Ltd.



Historic England

WEST MIDLANDS OFFICE

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

Direct Dial: 0121 625 6877

Our ref: PL00487325

6 November 2018

Dear Mr Latham

KINGTON AREA NEIGHBOURHOOD PLAN - REGULATION 16 CONSULTATION

Thank you for the invitation to comment on the Regulation 16 Neighbourhood Plan. We are pleased to note that our suggestions made at the Regulation 14 stage have been taken up.

In general our earlier Regulation 14 comments, therefore, remain entirely relevant. That is:

“Historic England is extremely supportive of both the content of the document and the vision and objectives set out in it. We particularly commend the use of historic characterization and landscape assessment to provide a context and a sound evidence base for well thought out Plan policies. In this and other respects Historic England considers that the Plan takes an exemplary approach to the historic environment including through masterplanning for major housing sites.

The recognition in the Plan of the importance of the local historic environment and the need to retain and enhance heritage assets and Kington’s conservation area (currently on the national Heritage at Risk Register) is highly commendable as is the emphasis on the conservation of local distinctiveness and the protection of locally significant buildings and landscape character, including important views.

In conclusion, Historic England considers that the Kington Draft Neighbourhood Plan exemplifies “constructive conservation” and constitutes a very good example of community led planning. All those who have clearly worked extremely hard in drafting the Plan are to be congratulated on the end product”.

I hope you find this advice helpful.

Yours sincerely,

Peter Arnold
Business Manager
peter.arnold@HistoricEngland.org.uk



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6870
HistoricEngland.org.uk



The Neighbourhood Planning Team,
Herefordshire Council,
Planning Services,
Plough Lane,
P.O. Box 230,
Hereford,
HR1 2ZB

4th June 2018

RE: Kington Area Neighbourhood Plan

Dear Planning Services,

We would make known our observations and objections concerning the procedures concerning the "Kington Area Neighbourhood Plan"

The first knowledge we had of a "Neighbourhood Plan" was with a delivery of the Winter 2014 Kington Chronicle which we received when returning home from work at 9.00pm on the 27th November, informing of a public meeting to be held **that evening** at 7.00 pm!!!

① ②

This was the beginning of the "Neighbourhood Plan" that has been badly publicised and certainly not involved a cross section of Kington Residents. Important decisions have been made at poorly attended meetings due to no advance publicity. This has resulted in the personal preferences expressed by the Chairman (now Mayor) and Secretary being driven to the current plan. It has not been a "Neighbourhood" Plan. We are also concerned that the whole process has not been transparent. An example of this would be the reducing of the Settlement Boundary at a Steering Committee meeting on 8th December 2015. This reduced the area and limited the potential development sites previously itemised and seemingly decided by **two persons!**

④

Decisions have been made contrary to the SHLAA report of 2011 where it was reported that K12/13 now K6/7, should not be developed because it would be too visible and not acceptable during the time frame.

We enclose a pack detailing objections to the decisions made by the so called Neighbourhood Plan Council Committee. No members of the Steering Committee or the Kington Town Councillors are directly affected by the green fields proposed for house building. They all live well away from any development possibilities!

A packed Public Meeting of Kington Residents held on 14th July 2016 at the Old Police Station overwhelmingly objected to the K12/K13 now K6/K7 green field proposition. There are serious concerns about safety and access raised by Kington Park Residents, which have been completely ignored.

③ ④

In the KANPlan Questionnaire of July 2017 a number of possible areas had been removed by the Council Chairman which reduced the decision choice. The majority of Kington residents replying confirmed that they DID NOT want to include K12/K13. The Question 1 was badly written and the results did not reflect the higher percentage against the inclusion.

Respondents were asked to "Please tick all those (sites) you agree with"
Those who did not agree with K12/13 development and therefore did not tick the box, **were not included in the survey!!** It is estimated that approximately 30 - 40+ objections were not accounted for in this survey. (5)

There were considerable objections to the KNAP written on notes during the Library Consultation Exhibition 6th June - 17th July 2017.

We are understandably also extremely concerned at the prospect of a Referendum on this plan. The vote for proposed KINGTON development sites should be made by KINGTON residents. We understand that Huntington, Kington Rural and Lower Harpton will be included in a vote on Kington. We can understand them voting on their own issues and on Kington High Street shopping areas, but cannot comprehend why they have an input on proposed KINGTON Housing development which could affect the final YES/NO vote. They may be entirely satisfied with their own Parish plans and this would result in an unrepresentative result for Kington.

We would ask:

How many Kington Town Councillors have had direct contact with the Planning Consultants employed by Kington Town Council to make the decisions on the proposed sites? We understand that the Chairman now Mayor and the Secretary have - but who else? This again concerns us and many others that the "Neighbourhood" Plan has been driven by a few individuals and not by the Neighbourhood. Councillors have not all agreed and questioned the proposals presented.


This policy is contrary to any Private Planning Application when residents can question an Architect, Consultant or Landowner directly on the matter. THIS HAS NOT BEEN THE CASE WITH THE KINGTON AREA NEIGHBOURHOOD PLAN!

When endeavouring to discuss matters with the mentioned Planning Consultant, I was informed that her services were paid for by the Kington Town Council and she was therefore unable to discuss the decisions made with myself or others. The decisions will affect a large number of Kington residents, who have been restricted from directly questioning the professional planning consultants involved. It would appear that consultants have been employed to reflect the preferences of the persons on the Steering Committee driving their "Neighbourhood Plan" forward.

Finally, we have been regularly informed that Kington is "obligated" to present a plan for +/- 200 dwellings. Yet private provisional plans were known about land near Headbrook during discussions with the Steering Committee and we were restricted from mentioning or voting on them. These plans for approximately 30 dwellings which includes "Affordable Housing" reflects the numbers mentioned in the 2011 SHLAA report yet the Chairman/Mayor and Councillors have opposed these plans, seemingly because they are not of **their** preference.

⑥
A B + C

We enclose the relevant supporting pages of the SHLAA report and would question why Professional Consultants who were presumably remunerated for their work, reached a conclusion in 2011 which has been completely overturned in 2014-18 by the Kington Town Council driven by the Chairman/Mayor and Steering Committee Secretary?

We thank you for reading our comments and supporting documentation which will presumably
 other comments collated throughout the period of consultation.



Martin Fitton,
Steering Committee
Kington Area Neighbourhood Plan,
Herefordshire.

22nd December 2014

RE: Kington Chronicle Winter 2014
Neighbourhood Plan

Dear Sirs,

We arrived home on Thursday 27th November to find the Kington Chronicle had been delivered. Having read the contents, we were understandably concerned to read the information and the designated map showing possible housing sites in the area within the Neighbourhood Area Plan. Unfortunately, it was too late to attend the meeting that evening.

We visited the Market Hall on the Friday to learn more information from Martin Fitton and Richie Cotterill. On this overall understanding, we would therefore wish to register our comments and questions on the procedures.

Who has suggested the development options within the report?

When walking around Kington, our own thoughts are that unused/vacant brownfield sites should be utilised whenever possible. There appear to be numerous vacant properties and many others that have been on the market for some considerable time.

Encouragement should be given for Retail premises in the High Street/Bridge Street to develop flats and housing on second floors etc. What number of shops have accommodation which is not utilised and under developed? The refurbishment of these premises would enliven and brighten the area which would then reinvigorate the town centre, especially if plans could be worked out for the road to be pedestrianised or traffic restricted/rerouted.

Of the long time vacated premises, what is happening to the Queens Head? the Wesleyan Building and land? the former Builders Yard and a former shop in Duke Street? the various obviously vacant properties in Bridge Street, the High Street and elsewhere? It would seem to be logical to take advantage of these for redevelopment/refurbishment for housing.

The Cattle Market appears to be under utilised, being occupied only at certain hours on various days during the month. Other towns and cities have seen their markets of all types moved to outer areas for easier transportation reducing congestion.. This would release land within Kington for housing development.

On the outskirts, land which has been developed in the past but is currently unused, near to the Arrow Industrial Park has potential to be improved and offer housing or factory/office units for linked employment.

Kington is classed as a Walking Centre and is endeavouring to encourage tourists and visitors who appreciate the scenery of green fields, hills and countryside. It is imperative that brownfield and previously used sites are utilised rather than remaining blighted, untouched and unoccupied.

Our own personal feelings are that "Redlands" in Kingswood Road, could be surrounded by housing developments, decimating the views towards Kington and Bradnor Hill and further which is the reason we made a major move to Kington.

The access from Headbrook into Kingswood Road is narrow and unsuitable for an increase in traffic especially larger lorries and construction vehicles. Due to old established stone cottage terraced properties situated near the junction not having garages, residents utilise the road for parking their vehicles and even now the narrow road only offers space for a car to pass "single file" I have seen bigger vehicles having to make use of the footpath! Additional traffic usage would cause chaos and frustration for the current residents.

Similarly, the access from the top of Kingswood Road/Eardisley Road junction passing the Rare Breeds Centre is not wide enough to take further traffic from lorries and HGV's. It can be classed as "single file" along the majority of the road. We would not wish for Kingswood Road to become a shortcut or "rat run"

Have other landowners been forthcoming or contacted apart from Mr Ian Laurie of Newburn Farm?

On again viewing the maps for suggested development. we noted that although not shown within the Kington Chronicle edition, an area along Eardisley Road, almost opposite the newly built Medical Centre was a potential site.

This area would have convenient access from the wider and suitable A road. It would be easier for Construction and HGV vehicles to enter during development, and similarly when occupied, homeowners' vehicles would be directed towards the A4111 and roundabouts onwards to Hereford, Leominster etc.

Bus services already operating along this route would have this additional stop in or out of Kington for the residents to encourage the usage of public transport with additional services organised,subject to the demand shown.

This area already has development further along the Eardisley Road and, in our opinion, would appear to be the most suitable option. Other remaining potential sites, we understand from comments made, appear to be of wildlife interest or near a flood plain.

There should be inducements stated in conjunction with any housing development, to encourage employment development and refurbishment of small factory units (Hatton Gardens, Arrow Court etc) We would not wish for Kington to become a "commuter town" and the aim should be that those of employment age work and live locally as much as possible. Income is more likely to be spent locally in conjunction with any integrated High Street planning. Otherwise, who is expected to buy/rent all these properties when there are so many existing houses that have been for sale over a lengthy period, and with little employment in the area. Surely, it is better to utilise and take full advantage of the current potential housing stock and redevelop brownfield sites, some of which we may be unaware of.

We thank you for taking note of our comments and concerns and will await any future meeting for discussion with interest.

Yours sincerely,

Ian and Joan Caney,



cc Celia Kibblewhite
Richie Cotterill

2015

②

I was blissfully unaware of any Neighbourhood Scheme until October/November last year in the Winter 2014 Kington Chronicle. Since then I have attended a number of meetings to understand the procedures.

I am becoming increasingly concerned at the proliferation of proposed housing sites on green fields along Kingswood Road. A nominal increase in traffic will create safety issues on a small country lane with access from Headbrook being a problem. Access from the Birches Farm end would be a completely idiotic decision. The vast majority of Kingswood Road barely allows two vehicle to pass, especially when construction and farm vehicles are concerned. There are issues with the pedestrian footpath also.

There appear to be properties within Kington on the market which have been unsold for months or indeed years and I have yet to be given an definitive answer why so many new dwellings need to be built. If the prospective

residents for these properties are expected to be commuters from Hereford, Leominster or further afield, they will do little to improve the local economy whilst adding further strain to already stretched local services and adding further traffic to our roads.

Where is the employment being created and where is the demand? If development must proceed, it would be preferably on a smaller scale.

The government are giving incentives for building homes on brown field sites and I would ask what consideration has been given to the area of Hergest Camp which appears to be an under utilised area. As Developers are to be given automatic planning permission to build on brown field sites then surely this should be a priority in any decision making which in turn would reduce the isolation of Arrow View.

I have heard numerous times that the new Medical Centre is also isolated. If the powers that be dictate that green fields should be developed, then the Hereford Road sites would create housing near to and next to that service whilst having a more convenient access from a main road.

House building to satisfy allocated quotas is in nobody's best interest.

3

Good Evening Kington Councillors,

I have several questions concerning the Neighbourhood Plan after receiving a recent notification

Would you please clarify that the meeting is on 14th July or 12th July? Both dates are mentioned in the content of the delivery.

On the map featured I would like to know who has made the decision on the Kington proposed planning boundary lines? These differ to those previously viewed and discussed.

Is it Kington Council or the Consultants employed?

Have they made these decisions independently?
(I would like to see a copy of the meeting minutes.)

Will these Consultants be at the meeting?

Ultimately, the Grants that have been obtained to employ the Consultants have been obtained using the multitude of taxes that the Kington residents pay and I believe it essential that we have an opportunity to discuss matters directly with them.

I am concerned that any consultants may be being directed by the Council Members members involved to verify their own preferences and write these into the various reports.

On viewing the addresses of the Kington Town Council members, it would appear that none of your homes are directly affected by the proposed housing developments. This may be sheer good fortune on your account, but it further strengthens the need for consultation with those directly affected, especially in the case of the major fields highlighted, and this includes the most recent elected members to the Council.

I attended the Steering Committee meeting on 14th June which was the first to allocate priority to K12 and K13. During the meeting it became evident that a draft plan had been made for the proposed housing development. When questioned, I was informed that this was for the sight of elected members only. I have since discovered that the plan has been viewed by non elected members. Rightly or wrongly, I have taken this as a decision to withhold information from myself and others who will be considerably affected by the proposed housing development.

Along with other residents, I have a number of other concerns and questions but these can be made at the public meeting.

KINGTON COUNCIL

JULY 2016

1. What was the point of the Kington Local Action Plan Survey - apart from fulfilling stipulations of setting up the Neighbourhood Plan? The report results of June 2013 appear to be being ignored by the Kington Council.
2. The preference for building in smaller developments has been overlooked in their proposals - and in the recording of the recent meeting minutes i.e.
67.40% prefer to build on redundant sites.
43.50% prefer to build in smaller clusters.
Only 2.5% in larger estates. (Does this reflect the minority of Council Committee members?)
3. There has been no public discussion and no clarity on how the boundary for the plan has been decided.
4. It appears that certain members have made their decision on where building should be concentrated with little regard to the general concerns. They therefore risk losing any referendum and the whole exercise being a total waste of time and money.

Joan Caney,



14TH July 2016

MEETING

A number of residents attending the meeting expressed a vote for common sense after viewing the potential housing plans for K12 and K13 described as the "most suitable?" on the Special Meeting notification. I believe the area to be an unsustainable area for building.

On the map featured, I would like to know who has made the decision on the Proposed Settlement Boundary. When viewing the area outlined on the Herefordshire Council website Kington Parish covers a much wider area. By reducing the area covered, KNAP have removed K18 from public discussion. The potential benefit would be to draw the Medical Centre into Kington and possibly remove the "isolated" comments made. Steering Committee members have stated that "It should not have been built there!" Well it has and Kington has to plan around it.

I quote from the booklet "A Guide to Neighbourhood Planning" produced by the CPRE (Campaign to Protect Rural England)

"A Neighbourhood Plan can cover just part of your parish or town if you prefer. **Alternatively, a Neighbourhood Plan can extend over boundaries**"

I have been led to believe by members of the Steering Group that this was not the case.

In my opinion the decision to develop part of K19 into a Recycling Centre was ill conceived as this would have been another potential housing site for the residents to consider. This point was also made by another attendee who commented that "The Council had shot themselves in the foot!" However, in an ideal world, the Cattle Market could be moved here with better transport access and housing built on the current site.

The meeting was limited to K12,13 and 15 but why was K10 shown as a Green Space when it was previously presented to the Council as a potential for at least 15 dwellings? The owner of the K15 land also stated to the meeting that he had not been consulted and negotiations had not taken place. He was angered that the Council had released this plan and would have nothing to do with it!

Ideally, it would be brownfield sites that would be developed. I understand that there are government grants available to developers. Deacons Yard and The Wesleyan Chapel are noted obvious examples but what about Hergest Camp? This area is vastly under utilised which offers potential on what is a vacated hard standing area previously used for housing. Arrow View is regarded as being isolated, but again future development could create a community with additional local facilities.

Have the decisions been made by the professional consultants independently or by being directed by driven Councillors acting on their own preferences? I understand that various grants have been obtained to pay for Consultant fees. These grants are presumably obtained from resident's numerous taxes and rates. Surely these residents should be able to question why sites have been chosen directly with these consultants.

Consultants were also involved and presumably costs incurred with the SHLAA reports 2007/2011. There were a number of potential sites within the 56 pages report but I would like to draw your attention to three greenfield sites. These were all described as:

Suitable: No

Achievable: Either yes or in part

Timescale: Not in the current Plan Period

Two of the greenfield sites were K12/13 whereas the other was sited to the west of Mountfield Road which has mysteriously been removed to be outside of the Proposed Settlement Boundary.

The well attended meeting reflected the fact that when notification of a meeting has been circulated to most (but not all) of the Kington residents affected, the "Neighbourhood" are concerned at the proposals. When demographic is known as being on average older than in the Herefordshire County - which in turn is older than other counties in England. The fact that the Neighbourhood Plan details are effectively hidden on their website only, results in the elderly and other residents who are not computer friendly, being unable to access information. I would suggest that the details are more comprehensively distributed in circulars, posters, news media and public meetings.

A true Neighbourhood view would then be obtained from the residents without being presented with a fete accompli.

Ian Caney,



Extracts from the Campaign to Protect Rural England booklet:

“How to shape where you live:
A guide to Neighbourhood PLanning..

A Neighbourhood Plan can cover just part of your parish or town if you prefer. Alternatively, a Neighbourhood Plan can extend across parish boundaries.

You will need to involve other people who may not agree with your views. It will require your community to reach a broad consensus on the objectives, key issues and desired outcomes.

Don't just contact those people who you know or who you think will agree with your views. Make sure that the whole community is aware of the intention to develop a Neighbourhood Plan. This might involve providing information in other formats, to make sure that all Can be involved.

It is essential that the content of your Neighbourhood Plan represents the views of the wider community, not just those of the project group. In developing your plan there should be a two-way flow of information, backwards and forwards between the leading group and the wider community.

Although a parish or town council may want to include only the area it covers, the boundary of the Neighbourhood Plan area can be extended, if this is justified and agreed with the adjoining parish or town council.

Before completing your Neighbourhood Plan, it is recommended that you carefully check it to make sure that what you are proposing stands a realistic chance of actually happening.

4

Monday 3rd October 2016

Good Evening Kington Town Council

At the Full Council Meeting on 4th July 2016, I raised questions concerning decisions made linked to the Neighbourhood Plan. I was informed that the relevant information was within the minutes of 30th November 2015. As the meeting minutes were not shown on the website at that time, I was kindly sent an email copy by the Council Clerk.

However, the information did not answer my questions, nor did my viewing other Council minutes. Infact, I also checked the Neighbourhood Plan website and copy minutes were not displayed at that time.

I also requested the information from the Chairman at the Steering Committee meeting on Tuesday 13th September but have received no response.

I have now noted that minutes for a Planning Group which took place on 8th December 2015 have since the July Full Council meeting, appeared on that website. At this meeting, those attending were (1 person responsible for Huntingdon, 1 for Kington Rural) (1 Kington Councillor who has now resigned) and 1 council member who was attending for the first time)

Having shown an interest in the plan, I had no prior notification and was completely unaware of this meeting.

There were NO MEMBERS OF THE PUBLIC IN ATTENDANCE!!

Decisions were therefore made by 2 People which resulted in major and significant changes to previous plans. Decisions were made behind closed doors at what turned out to be a secret meeting.

THIS IS NOT HOW A NEIGHBOURHOOD PLAN SHOULD WORK!

Kington Residents should have a say in where future possible housing development takes place and not be presented with a "done deal" or "faite accompli"

I had previously stated that Kington Residents should have the opportunity to voice their opinions and after my request, this was shown in the Special Meeting on 14th July. This was fairly well publicised for residents of Kington Park, Old Eardisley Road and Kingswood Road. and confirms that when residents are kept informed, they will attend and offer opinions.

At the extremely well attended, standing room only meeting questions were raised after the presentation.

Why Kington land previously mentioned was no longer offered for discussion and

Why the landowner of a field shown on your plan had not even been consulted.!!

My knowledge from the meeting was that the vast vast majority of those attending objected to the proposals made for many many reasons and commented whether other potential sites would be put forward for discussion.

When I see the amount of grants obtained (£2500, £6000, £7000 and more) for the Neighbourhood Plan, I along with others are extremely concerned that these monies are obtained from the general public, utilising our rates and numerous taxes payable.

We deserve to have a chance to discuss matters with the relevant professional consultants. It is all very well consultants reconfirming the ideas of their private paymaster's, **but this should not apply to the Council and the Neighbourhood Plan!**

I now have knowledge of **other** Neighbourhood Plans where posters appeared on nearly every lamppost and in every shop window. Input was invited from **ALL** residents not just a few

The poster stated:

“The current draft **Neighbourhood Plan** does not allocate any specific sites for housing.

We need **YOUR VIEWS** to consolidate the evidence for more housing and to identify specific sights or sights.

Can you suggest a better site for the future? Are you a landowner wishing to propose a site?”

The poster then listed no fewer than 5 dates and places for discussion.

This contrasts greatly to the limited promotion to Kington Residents and to their understanding of the Neighbourhood Plan.

Costly potential housing plans have been drawn up without the full consent and knowledge of Kington residents. Other potential sites have been overlooked by persons restricting the proposed settlement boundary and therefore limiting the proposed development area. Those persons have changed what was a potential housing development in earlier discussions, and which I now understand is in an advance stage of planning.....into a designated green space.

This was all decided at a meeting on **8th December 2015** whose information has only recently been made available to the wider community.

**AGAIN! THIS IS NOT HOW A NEIGHBOURHOOD PLAN SHOULD
WORK!!**

18TH APRIL 2017

COUNCIL MEETING

Are any Councillors disadvantaged by the Neighbourhood Plan? and
Do any Councillors live on Kington Park or The Old Eardisley Road or
on other roads leading from them?

The Southern side of Headbrook or Perseverance Close?

How about Kingswood Road?

Who is representing the views of these residents on the Kington
Council?

This is not a "Neighbourhood Plan", It does not appear to be a "Full
Council Plan" It is a plan that has been driven by one or two members
who live nowhere near the proposed developments!

The numbers of Kington residents who are disadvantaged by this plan
will be far greater than the numbers of votes secured by the Chairman
of the Steering Committee.

Who is representing the views of these residents?

In the Kington Local Action Plan - Survey Report of June 2013:

67.4% stated that they wanted housing on redundant sites

43.5% stated that these should be in small clusters.

Only 6.4% suggested using green field land!

Only 2.5% proposed larger sites!

There is a highlighted note within the survey.....

"Ensure views about the development type are reflected in the
Neighbourhood Plan

Has this Neighbourhood Plan reflected these majority views expressed? - Definitely not! It appears that their views are being ignored.

There has been a lack of information about the Neighbourhood Plan available to the residents of Kington. What is available has been published on a website which is clearly contrary to the report shown within the Survey Report (page 11)
Only about 5% respondents had mentioned a website for information.

It should also be noted that nearly 50% of the responses were from long standing residents living in Kington for over 20 years. Approximately 20% residing for 11-20 years. The people who know Kington. Are their views being considered?

I have seen no "Posters in Shops" which is a catalyst for conversation and "Word of Mouth" - the main methods of finding information expressed by nearly 80% of the residents. Again only about 5% mentioned a website!

I have previously mentioned my concern at the apparent veil of secrecy or lack of transparency with the Neighbourhood Plan. This is again reflected in the need to rearrange this Full Council Meeting. No mention was previously displayed on the Council Public Notice Boards nor the Council Website for the original Monday 10th April planned meeting or an Agenda published.

Where have Kington Residents obtained information or been involved in the Neighbourhood Plan? I have been obviously interested but have

found the process extremely frustrating and difficult. (Kington Chronicle Winter 2014- 27th November Meeting!!) Other residents are not fully aware of the possible consequences. Are they going to be presented with a done deal!

On just seeing this latest Draft Plan, I have comments on K15 which was previously highlighted for a green "Public Recreation Area" and outside the plan. This is now shown as a "Proposed Development Area"

I understand that there are requirements for Affordable Housing and one of the previous possibilities was an extension to the Shropshire Housing development at Temple Lane, previously Kingswood Hall (K16) The reason given to me by the Chairman of the Steering Committee for the non inclusion in the plan, was that it was "too far from Kington"

Is the Chairman aware that it is only 25 short paces from the K15 site!

There is a concern that potential sites have been removed due to personal preferences without discussion with the landowners. We have not had the opportunity to speak to the consultant planner(s) and as a consequence, residents are confused. Are the consultants following the preferences of the Steering Committee or making independent decisions.

This opinion would also apply to K10 or what is now GS06. The landowner had produced plans for consideration and shown on display at the Old Police Station. These were far more advanced than the ones currently shown by the Neighbourhood Plan and yet no

contact by the Council Committee or their employed consultants has been made.

This Kington Neighbourhood Plan is not fit for purpose!

MONDAY 5TH JUNE 2017
COUNCIL MEETING

5

Good Evening,

On a Positive note:

Congratulations should be given to those involved in organising the Kington Summer Food and Drink Festival last Saturday. It was well advertised and encouraged visitors to come to Kington.

It appeared to be well attended, the weather was fine and I hope the stallholders and traders benefitted from their involvement.

On a more Negative note:

I attended a rearranged full Kington Town Council meeting on 18th April to learn about the Neighbourhood Plan update. Unfortunately, only five Councillors attended and it was mentioned that a further release would be planned - possibly at the next full council meeting on Monday 8th May.

I checked this agenda when released and was informed that the item was not included.

I therefore kept an eye on the website and my wife checked the Market Hall board for any agenda or notification of a meeting.

We were therefore surprised and annoyed to then learn that a meeting had actually taken place on Monday 15th May!

This is a concern, as once again an important meeting where decisions have been made, has not been sufficiently publicised to allow interested Kington Residents to attend.

On delving deeper into the Neighbourhood Plan general procedures, I have learnt that other towns and communities have registered their requirements for the type of houses etc. similar to the information shown within the 2013 Kington Local Action Plan Report.

Other town councils have NOT acted as developers by identifying sites and obtaining grants to specifically show provisional detailed housing plans. Other councils have believed that finding sites should be left to builders and developers who would work to the restraints set out by the Neighbourhood.

It has been stated previously that this Neighbourhood Plan will be presented as a 'job done' to the people of Kington, many of whom are currently unaware of the implications. Those that are aware have great misgivings - such as the Kington Park Residents Association and others who attended a packed meeting that I requested here at the Old Police Station last July 2016. They feel that their comments and concerns mentioned have not been addressed as the majority were against any housing development due to many many reasons.

Important decisions have been made at Neighbourhood Plan Steering Committee meetings without any members of the Kington public being aware of a meeting and therefore not being present.

As a Kington Resident I would also like to stress the importance of the wording of any future Neighbourhood Plan Referendum which will require careful consideration so that people are fully aware of what they are voting for or against.

I can understand that Kington Rural and Huntington residents will vote on their own housing plan etc. and also the Kington High Street proposals, but have concerns on their voting for Kington housing as they are not directly affected. It should be local Kington Rural residents voting

for Kington Rural issues and Huntington residents voting for their issues. Kington proposals can be decided by those affected and disadvantaged.

I have been reassured by several Councillors that even if the housing proposals are passed at the Referendum, there is a likelihood that the mass house building will never happen because of the financial costs involved. However, if this is the case, the consequence is that areas will be “blighted” for no reason whatsoever.

I have been disappointed to learn that only **six** Councillors attended the 15th May meeting which is one better than the 18th April. The Neighbourhood Plan which is a very important issue for many people has been forwarded to Hereford Council without a full vote from the full Kington Town Council.

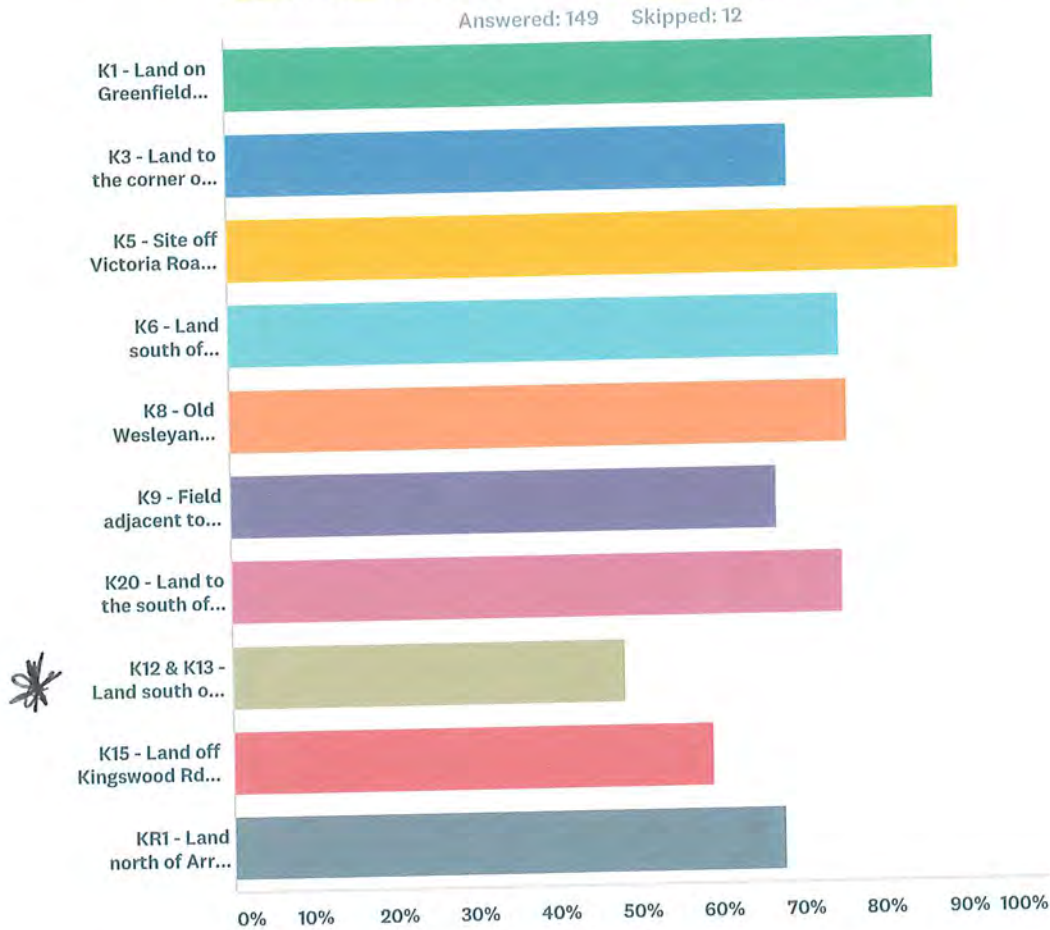
Thank for listening and hopefully taking note.

Ian Caney

5

Q1 The following sites have been identified for possible future housing development in Kington and Kington Rural. (see policy KANP H1 and the map on pages 1 & 2 of the Chronicle).

Please tick all those you agree with.



Answer Choices	Responses	Count
K1 - Land on Greenfield Drive, 2 dwellings	87.25%	130
K3 - Land to the corner of Llewelin Road and Garden Close, 4 dwellings	69.13%	103
K5 - Site off Victoria Road, 10 dwellings	89.93%	134
K6 - Land south of Elizabeth Road, 20 dwellings	75.17%	112
K8 - Old Wesleyan Chapel, Crabtree Lane, 10 dwellings	75.84%	113
K9 - Field adjacent to Mill Street, 15 dwellings.	67.11%	100
K20 - Land to the south of Hergest Road, 2 dwellings	75.17%	112
K12 & K13 - Land south of Kington, 100 dwellings	48.32%	72
K15 - Land off Kingswood Rd, 5 dwellings	59.06%	88
KR1 - Land north of Arrow View, Hergest, 15 dwellings (Kington Rural).	67.79%	101

Total Respondents: 149

#	Any other sites you could suggest?	Date
1	concerned about access to 12 & 13 consider a second access off Kingswood Road ✖	7/24/2017 3:29 PM
2	If increasing no of houses at Arrow View, maybe a hard paved footpath into Kington would be a good safety measure	7/24/2017 3:26 PM
3	K12 only (not 13) ✖	7/24/2017 3:21 PM
4	The site on Arrow View could accommodate a full estate with community shop	7/20/2017 9:50 AM
5	Use original stone from chapel to match older town buildings. Brownfield industrial sites (no longer used) off Waterloo road beyond Sunset Row and Vets. Some parts of industrial area to the east of Hergest Road opposite Arrow View.	7/20/2017 9:41 AM
6	Hergest Camp	7/20/2017 9:26 AM
7	In the event of the library being closed this building could be several flats. Land to the west of Kingswood Road, currently owned by the Ian Laurie (left hand side of private road). Part of Hergest Camp	7/20/2017 9:12 AM
8	Site opposite Kington surgery with access directly on to the main road. Would only support K12 & K13 if different access eg from main road behind the recycling site. ✖	7/19/2017 11:06 PM
9	K6. Could this area be liable to flooding?	7/19/2017 10:57 PM
10	If new houses are to be built local business and tradesmen need to be used, not Taylor Wimpy, Bloor etc	7/19/2017 10:51 PM
11	Very concerned about the safety of the proposed access to K12 & K13 which is already very congested. ✖	7/19/2017 10:48 PM
12	The far side of the bypass Along the road to the surgery adjacent to the doctors surgery	7/19/2017 10:41 PM
13	The St John garage at the top of the square opposite the Garth. For sale?	7/19/2017 10:33 PM
14	We do not need any more houses particularly on green field sites ✖	7/19/2017 10:28 PM
15	The waste land on Hatton Gardens Industrial Estate. The football ground (does not have to be in the town)	7/19/2017 10:16 PM
16	Hereford - unless they fund Kington area infrastructure first. ✖	7/19/2017 10:00 PM
17	Tidy up industrial area - scruffy. Could be used for housing. Relocate cattle market and use this space.	7/19/2017 9:50 PM
18	No! The water/waste infrastructure will not cope with the amount of building you have on this plan.	7/19/2017 3:35 PM
19	Hergest camp area is already too industrial, scrappy and untidy in the rural setting. Would mean an extra 15 - 30+ vehicles using Brilley Road and junction at Kington Church. K12 & K13 too many concentrated in one area. Not sympathetic to character of Kington.	7/19/2017 3:30 PM
20	We have a small school. Land for a new one??	7/19/2017 3:26 PM
21	Part of K6 area is a flood plain and neighbouring existing home are having trouble with insurance.	7/19/2017 3:03 PM
22	Field at Headbrook has good access to the town, it's flat and in walking distance to High Street. K12 & K13 will use cars! ✖	7/19/2017 2:59 PM
23	South of Hatton Gardens towards A44	7/19/2017 2:56 PM
24	I think the sites ticked above suit Kington's infrastructure and housing requirements. The large development is unnecessary. ✖	7/19/2017 12:25 PM
25	Land below Prospect Place and just off the High Street. At rear of no13 High Street, ex factory site Hatton Gardens.	7/19/2017 12:10 PM
26	North of Headbrook, between houses and river.	7/19/2017 12:05 PM
27	No. There is insufficient infrastructure in Kington to support 200 additional dwellings.	7/19/2017 11:53 AM

28	Concerned about access to K6. The first 5 bungalows along Elizabeth Rd do not have drives and cars are always parked outside, leaving a narrow roadway especially for large vehicles.	7/19/2017 11:50 AM
29	Brownfield site between Montfort Road U91203 and Back Brook.	7/19/2017 11:46 AM
30	Possible alternatives to sites K12 & K13: 1) Ridgebourne, but road access not ideal 2) East of A4111 from junction with A44, but pedestrian link to town difficult.	7/19/2017 11:26 AM
31	Please could K9 be reserved for sheltered housing.	7/19/2017 11:21 AM
32	K19 in the 2015 plan. Who veto'ed this? Site could be aurally/visually screened from the recycling site.	7/19/2017 11:15 AM
33	By not adopting this boundary many other sites come into play. Why not by the medical centre to help link this into the community? Especially opening up the riverside to public access.	7/19/2017 11:06 AM
34	The previously proposed development at Headbrook which would bring the riverside into public accessibility is a good idea. To discount the cattle market would be wrong either it will soon become redundant or too small for purpose.	7/19/2017 10:55 AM
35	K10	7/19/2017 10:46 AM
36	Land adjacent to Tack Farm along A4111 leading up to medical centre. Easier access from road for developers. Turners field, allowing access to riverside walk.	7/18/2017 10:57 PM
37	Crooked Well Meadow. The play area is very little used. Access off the bypass, short walk to the square.	7/18/2017 10:49 PM
38	K12 & K13 is too large a development unless better access can be secured. Better to move cattle market to a more suitable site and develop that. *	7/18/2017 10:44 PM
39	See attached map and notes.	7/18/2017 10:14 PM
40	I think we should have been offered a longer list of all the possible sites to choose from to accommodate the 200. The most popular should then have become the plan	7/18/2017 10:08 PM
41	Smaller sites. I would prefer not to have a large housing estate. This was not what was voted for by the community. *	7/18/2017 10:02 PM
42	Land just west of K12 (over Kingswood Lane) where low density self build development has been the subject of a recent planning application	7/18/2017 9:52 PM
43	Ribbon development west of Kingswood Road. Excellent idea!	7/18/2017 9:24 PM
44	Because of drainage there are too many on the mains now. And that's why it blocks and floods.	7/18/2017 9:13 PM
45	Stock market, love lane	7/18/2017 9:03 PM
46	Kington does not have the facilities for so many new properties - no GP's, no banks, no 6th form, etc etc	7/18/2017 8:59 PM
47	Telephone exchange land in Bridge Street	7/18/2017 11:16 AM
48	No	7/18/2017 12:40 AM
49	Fields on A44/A4111 corner. The cattle market.	7/17/2017 9:19 PM
50	McCartney's Cattle Market site, obviously! (no excuses)	7/17/2017 4:21 PM
51	Recent planning application for five self build homes (Laurie's) is an ideal way forward to start providing homes. An opportunity for local people to build with the use of local tradesmen, supplies and businesses. Advantage should be taken of such small infill sites in both Kington Town and Rural to promote self build as supported within the document. Concern at Arrow View being selected for 15 rural allocation with its lack of transport, work, close by facilities (school and surgery). The build of 15 houses in Kington Rural could be provided on carefully considered individual single plots over the next 20 years. This would allow the next generation an opportunity to stay in affordable homes in their community and an opportunity for tradesman to keep in work. Why would 15 houses be put on Arrow View where no facilities exist - no village hall, no pedestrianised road. This plan could give real opportunity to 15 high standard plots in Kington Rural.	7/16/2017 8:13 PM
52	Land at Headbrook Land at Hatton Gardens 'industrial estate' Land adjacent to doctors surgery and household waste site Kington Primary School (assuming that it will move to the LHS campus)	7/16/2017 7:04 PM

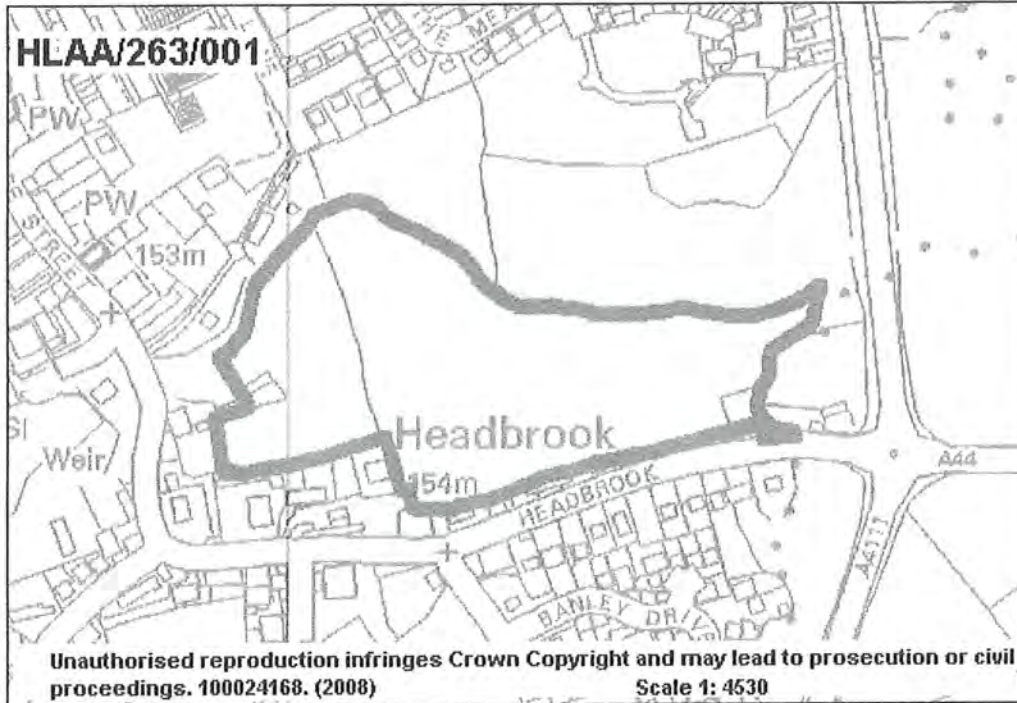
53	Smaller sights spread out, however not disturbing the green strip around the river	7/16/2017 3:40 PM
54	K10 Headbrook	7/14/2017 10:49 PM
55	K10 headbrook	7/14/2017 10:00 PM
56	Headbrook k10	7/14/2017 9:57 PM
57	Previously proposed Headbrook development	7/14/2017 11:24 AM
58	Turners Field would offer a riverside walk which would attract visitors. Land near to the Medical Centre to bring the facility "nearer" to Kington Residents. Other possibilities with easier access from A4111.	7/14/2017 11:10 AM
59	North of Hergest Road West of Kingswood Road Kingswood itself for Kington Rural allocation East of Eardisley Road (Reset Parish Boundary with Lyonshall)	7/14/2017 8:45 AM
60	Strongly AGAINST K12, K13 and K15. These areas acts as flood plains. Also Kingswood Road is not suitable for (a) heavy construction traffic and (b) increased traffic usage following the building of 100+ houses (resulting in 200+ additional cars /vehicles using this road daily) In particular towards the junction with Headbrook the road is barely two small cars wide and I have seen may times vehicles having to mount the pavement to pass each other. Increased traffic along Kingswood Road (during and post construction) will almost certainly result in damage to existing Kington residents property (cars / walls / even residents themselves).	7/13/2017 9:31 PM
61	K10 Site at Headbrook	7/13/2017 7:38 PM
62	Cannot agree to K12 & K13 whilst it is proposed to run a road from Old Eardisley Road. The turning at the Kingswood Road is more than adequate. Traffic lights would be a much more cost effective solution if something is needed.	7/11/2017 4:14 PM
63	Land at headbrook	7/6/2017 7:40 PM
64	Land at Arrow Court industrial estate HR5 3ER, north-west of Woodside; south-west of The Bungalow; and north-west of Grendon.	7/6/2017 5:15 PM
65	Field off Headbrook Road as originally proposed	7/5/2017 11:34 AM
66	Headbrook field	7/3/2017 7:48 PM
67	Land behind houses on Headbrook	7/3/2017 7:38 PM
68	The town centre cattle market. This is would provide near town centre housing and improve the environment by reducing tractors, heavy lorries and other transport associated with the market. This is prime land wasted for animal stock sales. Moving the market to the edge of the town would allow easier access for users of the market and remove noisy and smelly traffic in to Kington. If the council cares about the environment this is the obvious choice for both current residents living near the market as well new mixed housing.	6/25/2017 11:37 AM
69	This is not the way to identify housing land. Since 2011 how many houses have been built in Kington each year, and of that figure, how many were "social" housing. How many people are on the housing list? every effort should be made to locate new housing so that they can be accessed from A roads, not local roads. This is especially the case for K12,13,15. Their main access should be onto the A road, perhaps with a new junction layout at the Recycling centre/medical centre. And in that approach, (local roads for pedestrians, particularly children) the southern settlement boundary should be extended southwards, to include the large field opposite the medical centre, and new housing physically discouraged from using kingstown road or Eardisley Road.	6/25/2017 11:09 AM
70	Hatton Gardens Industrial Estate, near the roundabout there's alot of concrete and old buildings that could be built on.	6/22/2017 3:42 PM
71	Land on Hatton Gardens . Brown field site	6/19/2017 7:18 PM
72	Land to south of Yeld Lane	6/16/2017 11:18 AM
73	What happened to the North Headbrook proposed site? Why isn't the land around the new Surgery considered for development when access is so much easier?	6/13/2017 6:57 PM

A

LINK PLANNING P181494/0

2018 (PART OF SITE)

Settlement: Kington Site Ref: HLAA/263/001
 Site Address: Land to the north of Headbrook



A

Information Source:	Call for sites	Site Area (ha):	3.83
Agricultural Land Classification:	3		

Suitable: Yes <input type="checkbox"/>	Potential Housing Capacity: 30
Suitable: No <input type="checkbox"/>	
Suitable: Part <input checked="" type="checkbox"/>	Greenfield <input checked="" type="checkbox"/>
Achievable: Yes <input type="checkbox"/>	Brownfield <input type="checkbox"/>
Achievable: No <input type="checkbox"/>	Timescale: 1-5 Years <input type="checkbox"/>
Achievable: Part <input checked="" type="checkbox"/>	Timescale: 6-10 Years <input type="checkbox"/>
Available: Yes <input checked="" type="checkbox"/>	Timescale: 11-15 Years <input type="checkbox"/>
Available: No <input type="checkbox"/>	Timescale: 16-20 Years <input checked="" type="checkbox"/>
Available: Don't Know <input type="checkbox"/>	Timescale: Not In Current Plan Period <input type="checkbox"/>

WITHIN
TIMESPAN

WHY HAVE KINGTON TOWN COUNCIL / MAYOR OBJECTED TO APPROX 30 HOUSES WHEN SHLAA SUGGESTS c 30?

Settlement:	Kington	Site Ref:	HAAA/263/001
Site Address:	Land to the north of Headbrook		

Summary Description:

Grassland. Level site. Views into site: Prominent area along river. Adjacent/surrounding land: Housing to the south and west, river and agricultural land to the north. Site integration: Protected area of open land between built up areas. Limited development close to Headbrook could integrate but the site as a whole would not. Height and character: 2 storey houses/cottages. Policy constraints: Area used by owls and bats. Conservation area for west of site only. The River Arrow flows north of the site which has an Special Wildlife Site designation. Site is within a Conservation Area

(A)

Flood Information:

The site is classified as being partially in zone 3 and the risk of fluvial flooding may be high. The proposed use needs checking on the basis of the relevant flood zone. PPS25 exception test may be required for this development in this flood zone

Water information:

Sewerage: Parts of the public sewerage network suffer from hydraulic overloading. No regulatory improvements are planned under Dwr Cymru Welsh Water's current 5 year Capital Investment Programme. Should this site be developed in advance of any regulatory improvements, developers may be required to fund the essential improvements.

Sewage treatment: The total allocations proposed for this area would overload the design capacity of the Waste Water Treatment Works. Dwr Cymru Welsh Water would require the Council to release the allocations at a later stage in the plan process to allow sufficient time to undertake essential improvements. Should any development occur in advance of Dwr Cymru Welsh Water's Capital Investment, developers may be required to fund the essential improvements.

Water supply: The development of this proposed site would require off-site mainlaying from a point of adequacy on larger diameter/pressure water mains. Where off-site water mains are required, these can be provided under a water requisition scheme, the costs of which would be borne by potential developers.

Landscape:

High Sensitivity: The site has significant value as a landscape resource and/or key characteristics of landscape are very vulnerable to change

Historic landscape:

Sensitivity 1. Areas where high historic environment values have been identified, and where large scale new development is therefore likely to have significant impact on the integrity of the inherited landscape. Some closely restricted development may occur as informed by detailed historic environment impact and design studies

Highways information:

Vehicle access onto Headbrook preferred, at eastern end of site. Sustainable (bike and pedestrian) access route to the west also needed.

Biodiversity:

Artificial habitats considered to have limited ecological constraints

Is the site suitable (and achievable) for development?:

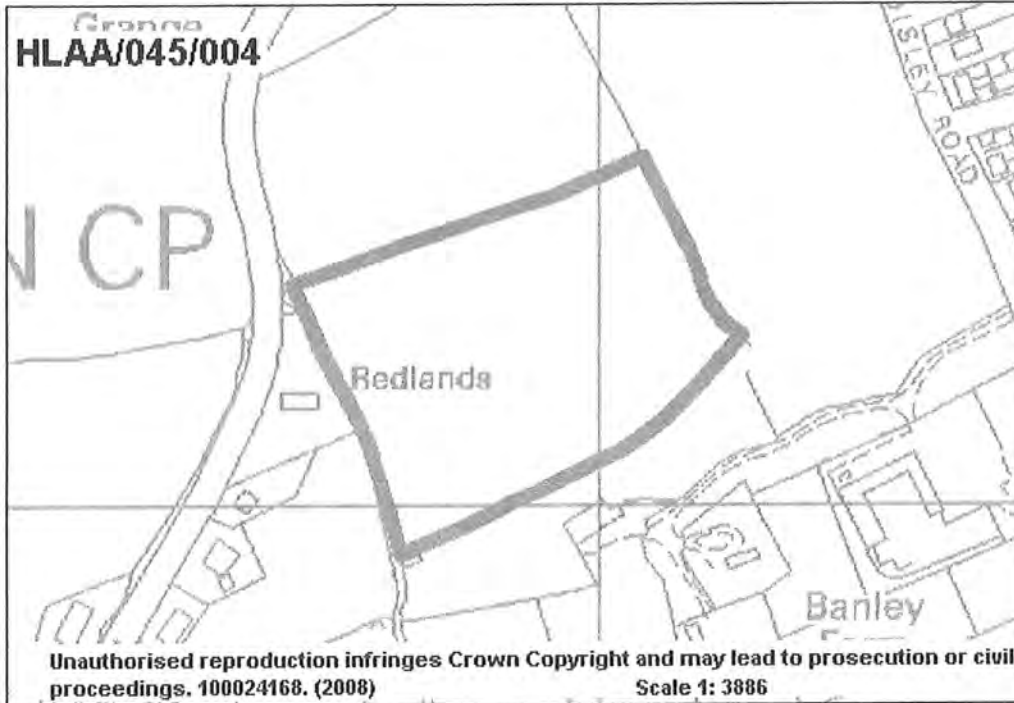
Not entirely. There are issues relating to landscape/access/flood zone. Smaller area outside flood zone to rear of Headbrook may be acceptable but there is no suitable existing access

Can the entire site be developed?:

No due to constraints in certain areas

K6+K7 (B+C)

Settlement: Kington Site Ref: HLAA/045/004
Site Address: Land to east of Redlands, Kingswood Road



Information Source:	Call for sites	Site Area (ha):	2.74
Agricultural Land Classification:	3		

Suitable: Yes <input type="checkbox"/>	Potential Housing Capacity: N/A
Suitable: No <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Suitable: Part <input type="checkbox"/>	Brownfield <input type="checkbox"/>
Achievable: Yes <input type="checkbox"/>	Timescale: 1-5 Years <input type="checkbox"/>
Achievable: No <input type="checkbox"/>	Timescale: 6-10 Years <input type="checkbox"/>
Achievable: Part <input checked="" type="checkbox"/>	Timescale: 11-15 Years <input type="checkbox"/>
Available: Yes <input checked="" type="checkbox"/>	Timescale: 16-20 Years <input type="checkbox"/>
Available: No <input type="checkbox"/>	Timescale: Not In Current Plan Period <input checked="" type="checkbox"/>
Available: Don't Know <input type="checkbox"/>	

NOT IN
TIMESPAN

WHY HAS MAYOR / CHAIRMAN PROPOSED 100 HOUSES
ON K6/7 (K12/13) WHEN SHLAA REPORTS NOT
SUITABLE?

Settlement:	Kington	Site Ref:	HAAA/045/004
Site Address:	Land to east of Redlands, Kingswood Road		

Summary Description:

Arable land. Sites rises to the south. Views into site: Prominent, elevated land. Views out of site: Extensive views to the north. Adjacent/surrounding land: Agricultural land. Public right of way: Yes, adjacent to western side. Site integration: No, adjacent a ribbon of developed houses but otherwise divorced from built up area. Height and character: 2 storey residential development.



Flood Information:

The site is classified as being fully in zone 1 and the risk of fluvial flooding may be low. The proposed use is appropriate on the basis of the relevant flood zone. PPS25 exception test will not apply for this development in this flood zone

Water information:

Sewerage: Parts of the public sewerage network suffer from hydraulic overloading. No regulatory improvements are planned under Dwr Cymru Welsh Water's current 5 year Capital Investment Programme. Should this site be developed in advance of any regulatory improvements, developers may be required to fund the essential improvements.

Sewage treatment: The total allocations proposed for this area would overload the design capacity of the Waste Water Treatment Works. Dwr Cymru Welsh Water would require the Council to release the allocations at a later stage in the plan process to allow sufficient time to undertake essential improvements. Should any development occur in advance of Dwr Cymru Welsh Water's Capital Investment, developers may be required to fund the essential improvements.

Water supply: The development of this proposed site would require off-site mainlaying from a point of adequacy on larger diameter/pressure water mains. Where off-site water mains are required, these can be provided under a water requisition scheme, the costs of which would be borne by potential developers.

Landscape:

High Sensitivity: The site has significant value as a landscape resource and/or key characteristics of landscape are very vulnerable to change

Historic landscape:

Sensitivity 1. Areas where high historic environment values have been identified, and where large scale new development is therefore likely to have significant impact on the integrity of the inherited landscape. Some closely restricted development may occur as informed by detailed historic environment impact and design studies

Highways information:

Would need improvements to footway to town, which may be difficult to provide, as third party land required. Visibility splays also difficult to achieve. Via HAAA/008/001 only.

Biodiversity:

Arable land where ecological constraints are likely to be limited

Is the site suitable (and achievable) for development?:

No, elevated land. Significant landscape impact. Well beyond built up area of town

Can the entire site be developed?:

No

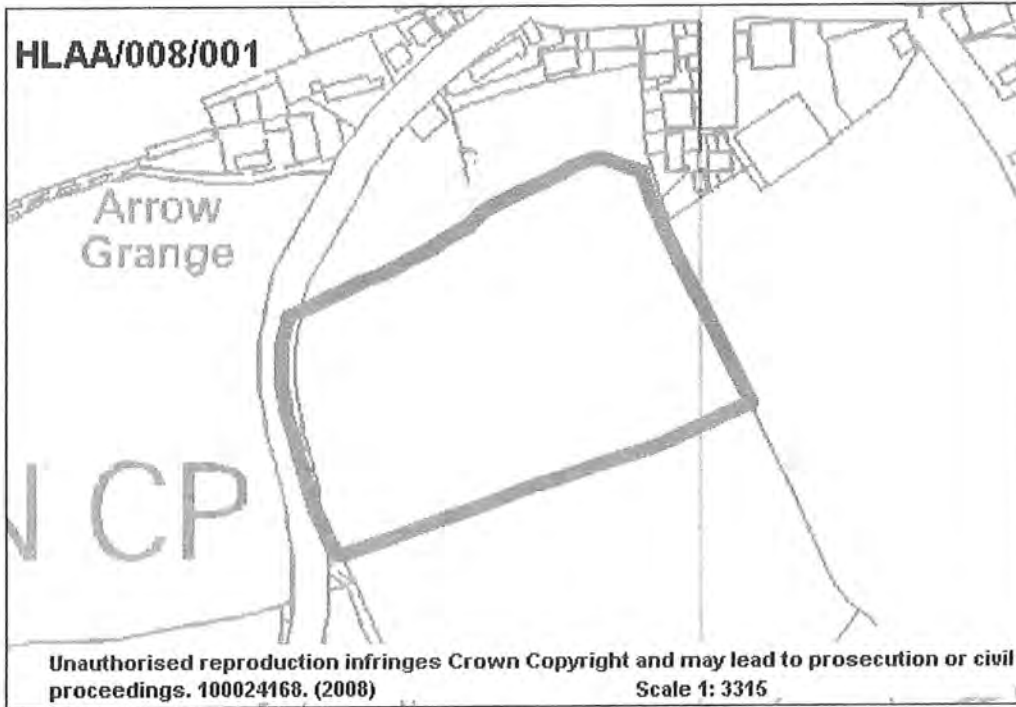
K6+K7

(B)+(C)

HEREFORDSHIRE'S STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT (SHLAA) 2011

Settlement: Kington Site Ref: HLAA/008/001
Site Address: Field at 0020 at Headbrook

(C)



Information Source:	Call for sites	Site Area (ha):	2.23
Agricultural Land Classification:	3		

Suitable: Yes	<input type="checkbox"/>	Potential Housing Capacity: N/A	
Suitable: No	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
Suitable: Part	<input type="checkbox"/>	Brownfield	<input type="checkbox"/>
Achievable: Yes	<input type="checkbox"/>	Timescale: 1-5 Years	<input type="checkbox"/>
Achievable: No	<input type="checkbox"/>	Timescale: 6-10 Years	<input type="checkbox"/>
Achievable: Part	<input checked="" type="checkbox"/>	Timescale: 11-15 Years	<input type="checkbox"/>
Available: Yes	<input checked="" type="checkbox"/>	Timescale: 16-20 Years	<input type="checkbox"/>
Available: No	<input type="checkbox"/>	Timescale: Not In Current Plan Period	<input checked="" type="checkbox"/>
Available: Don't Know	<input type="checkbox"/>		

WHY HAS MAYOR / CHAIRMAN & SECRETARY PROPOSED 100 HOUSES ON K6/7 (K12/13) WHEN SHLAA REPORTS NOT SUITABLE?

Settlement:	Kington	Site Ref:	HAAA/008/001
Site Address:	Field at 0020 at Headbrook		

Summary Description:

Grassland. Site slopes steeply to the south. Views into site: Prominent elevated land. Views out of site: Views to the north. Adjacent/surrounding land: Agricultural land. Site integration: No, the site is not well related to existing built form, elevated, sloping site. Height and character: 2 storey houses in vicinity.

**Flood Information:**

The site is classified as being fully in zone 1 and the risk of fluvial flooding may be low. The proposed use is appropriate on the basis of the relevant flood zone. PPS25 exception test will not apply for this development in this flood zone

Water information:

Sewerage: Parts of the public sewerage network suffer from hydraulic overloading. No regulatory improvements are planned under Dwr Cymru Welsh Water's current 5 year Capital Investment Programme. Should this site be developed in advance of any regulatory improvements, developers may be required to fund the essential improvements.

Sewage treatment: The total allocations proposed for this area would overload the design capacity of the Waste Water Treatment Works. Dwr Cymru Welsh Water would require the Council to release the allocations at a later stage in the plan process to allow sufficient time to undertake essential improvements. Should any development occur in advance of Dwr Cymru Welsh Water's Capital Investment, developers may be required to fund the essential improvements.

Water supply: The development of this proposed site would require off-site mainlaying from a point of adequacy on larger diameter/pressure water mains. Where off-site water mains are required, these can be provided under a water requisition scheme, the costs of which would be borne by potential developers.

Landscape:

High Sensitivity: The site has significant value as a landscape resource and/or key characteristics of landscape are very vulnerable to change

Historic landscape:

Sensitivity 1. Areas where high historic environment values have been identified, and where large scale new development is therefore likely to have significant impact on the integrity of the inherited landscape. Some closely restricted development may occur as informed by detailed historic environment impact and design studies

Highways information:

Would need improvements to footway to town, which may be difficult to provide, as third party land required. Visibility splays also difficult to achieve.

Biodiversity:

Not surveyed

Is the site suitable (and achievable) for development?:

No. Development would have significant landscape impact, sloping site, access would also be difficult due to bend in lane

Can the entire site be developed?:

No

NO to mass housing “Neighbourhood” Plan in KINGTON

If our town Mayor and planning consultants brought on board by him have their way, quite soon this corner of rural England will be blighted like so many others. A new mass development of 100+ houses is proposed, a sprawl of boxy modern homes not in keeping with the area (three storey properties?) on agricultural land. Over 200 dwellings in total have been proposed in what could be described as a large village although historically classed as a market town.

In Kington, it's hard to find anyone who is in favour of the threatened housing proposal. It is, in effect, being imposed on the community. Ill considered housing is a threat to our countryside.

It is the consequence of a disastrous national housing policy. Current Government housing policy boils down to this: encouraging councils to set high building targets, which they in turn look to developers to deliver.

And how do they deliver it?

By pressing the councils to release more land, despite the fact that there are many 'permissions' to build still

outstanding elsewhere, plans not started.

Councils are riding rough-shod over the feelings of local people in the process.

The “Neighbourhood Plan” should be decided by the whole Kington Community and not just a few people and the Kington Council presenting a ‘job done’ plan. The current edition of the Kington Chronicle should have been presented at the beginning of procedures, asking for opinions. It should make clear to residents the full description of areas previously shown in the SHLAA Report of 2011. We are now being presented with a “proposed development boundary” which conveniently excludes previous possibilities and was voted on with no members of the public in attendance.

The Government needs to stop merely paying lip service to protecting green fields and empower communities to help this happen.

I understand the concern about housing shortage, and the anger of some who feel it is more important to provide housing than protect green fields, but if it has to be done - build where there is a proven need and not to merely justify ‘quotas for quotas sake’ to satisfy Herefordshire Council and government departments far removed from

this area. We should not be dictated to but make decisions right for Kington as planning has apparently become more local.

We must build new houses, but we must build the right ones in the right place where they are needed and there is a demand. We simply cannot continue to consume our beautiful landscape one field at a time – and not just because of the impact on our countryside.

Kington is served by Primary and Secondary schools, a post office, shops in the High Street and several pubs. They underpin our community, helping to provide its lifeblood.

The Medical Centre is under pressure from the current population, as is the infrastructure for sewerage, water and the road network. How could they cope with a far greater number of residents? .We have no banks.

There are plenty of big, empty brownfield spaces elsewhere crying out for attention: stark, infuriating reminders why our housing policy needs to change

In our continuing haste we must not lose sight of one vital thing: when land is developed it is gone for ever. That's why the stakes could not be higher – get this wrong, and we are stealing from our grandchildren. The countryside belongs to all of us, and the more we live in cities the more

we need its peace and beauty to restore us. If we look after it, Nature will pay us back a thousand-fold.

Concerned Kington Resident,
Name and Address Supplied.

Latham, James

From: Ian Caney
Sent: 01 August 2018 21:48
To: Neighbourhood Planning Team
Subject: Fw: Kington Area Neighbourhood Plan: 200 New Houses?

Attention James Latham

Dear James,

Please add this copy email to my information pack already in your possession, linked to the Regulation 16 Consultation.

Thank you.

Kind Regards,

Ian Caney

From: Ian Caney
Sent: 02 October 2017 10:39:22
To: clerk@kingtontowncouncil.gov.uk
Subject: Kington Area Neighbourhood Plan: 200 New Houses?

Dear Clerk,

I have just viewed the Summer 2017 edition of the Kington Chronicle and the article concerning the Kington Area Neighbourhood Plan.

"Will Kington expand by 200 houses? Er, no.".....

The content then minimises the effect of the Neighbourhood Plan as if it will not happen due to the state of the Kington sewers.

It does not take into account the residents with properties near to the major "identified" sites which will be blighted owing to the fact that the sites will be listed if passed for everyone to see. This is a major disadvantage to the affected homeowners. The comments belittle their anxiety and concern.

I see no benefit or advantage in Kington Town Council identifying the major sites for 100+ dwellings. In my opinion it would be better leaving the decision to market forces with developers deciding in the future whether the project would be viable or not. At least then, any decision could be made in the future and not have the present situation of homeowners having their properties blighted by the Kington Area Neighbourhood Plan.

It seems a ridiculous waste of time and money to "identify" major sites which do not have a proven demand and are unlikely to be developed because of the financial costs involved. It is understood such mass development could not be built for 10-15 years because improvements need to be made to infrastructure. By that time other suitable site may become available for consideration.

I understand that no Councillors are affected by the main identified sites, it could be construed that personal interest protection is being promoted in this policy.

How many of the Summer 2017 edition Kington Chronicles were printed and distributed? I am obviously interested in the Neighbourhood Plan procedures and only became aware of the publication at the Goulash event in September at

the Market Hall.

Finally, I would congratulate all those involved in the Kington Walks programme. We thoroughly enjoyed our walks and events which were well organised and are a positive influence on Kington in bringing visitors to the town to enjoy the beautiful scenery. Well Done.

Money spent on the Kington Area Neighbourhood Plan could well have been put to greater effect in "identifying" other projects to encourage visitors to come to Kington and improve appearance of the decaying High Street.

Ian Caney,

Sent from my iPad

Sent from my iPad

Latham, James

From: Ian Caney
Sent: 26 October 2018 10:53
To: Latham, James; Neighbourhood Planning Team; ldf
Subject: KINGTON NEIGHBOURHOOD PLAN CONSULTATION PERIOD.

Although I'm aware of the current consultation period for the Kington Area Neighbourhood Plan reaching Regulation 16, it appears that the vast majority of Kington residents are not. This includes members of the Chamber of Trade and more importantly residents of Kington Park and vicinity who will be greatly affected by the proposed outlying plan which did not receive a majority vote for a large development by the public.

Is the publicity notification for this Consultation Period the responsibility of Herefordshire Council or Kington Town Council?

The letter from Richard Gabb, Programme Director Growth, is hardly eye catching and displayed in four places not near to the affected areas.

- 1) Old Police Station Notice Board: This is not on a main thoroughfare and hardly any pedestrian would pass this building.
- 2) Market Hall Notice Board: There is nothing to draw attention to this important consultation and differentiate it from normal Council notices. I would estimate that very few people would pass to read these notices.
- 3) Co-Op Car Park Area Lamp post: At least this is in a pedestrian footfall area, but when I viewed the blue plastic holder containing the letter, it was folded over displaying the blank reverse side. This would not draw anyone to the notification.
- 4) Sally's Pantry Lamp post: the same blue plastic holder on a very narrow stretch of pavement with double yellow lines on the road. Most pedestrians would be on the opposite side wider pavement being a shorter walk into Kington. Any customers to Sally's Pantry would also park on the opposite side and would be unable to see the notice.

I was surprised that the Neighbourhood Plan letter was not shown on the Kington Park Residents Notice Board. This is placed near a children's play area and walk which will be greatly affected as the access to the proposed 100+ dwellings suggested by Kington Town Council is to be through this area creating serious road safety issues.

I would ask for the lack of notification to be addressed for the remaining period of the consultation.

Ian Caney

I would have thought that notices would have been placed in shops, schools etc. I could not even see a notification in the Kington Library where the printed documents are anonymously placed on an upstairs corner table with other non related paperwork. There is no explanation and nothing to draw anyone's attention to this important documentation.

Has the Herefordshire County Council Neighbourhood Plan contacted the Hereford Times and Mid Wales Journal and made them aware of this Consultation period? If this is meant to be a genuine "public" consultation period - then the public have a right to be at least aware of it, and as such publicity material should be displayed in areas likely to draw attention.

J. & P. Turner

Agricultural Merchants and Arrow Mills Garden Centre

Established 1801

Arrow Mills, Kington, Herefordshire. HR5 3DU.

Tel : (01544) 230536

sales@arrowmills.co.uk

www.arrowmills.co.uk

12th November 2018

KANP Regulation 16 Consultation

With reference to the KANP consultation we believe that an opportunity has been missed which would have been of great benefit to the Town. We have not been consulted by the KANP on either their aspirations or our plans for the future.

4.15 We are Kington's oldest business, established in 1801, and still under the same family ownership. The present generation are hopeful of this family tradition continuing on into the next century with the arrival of two grandchildren. We are committed to the future prosperity and vibrancy of Kington and so are disappointed that we have not been consulted by the KANP (KANP Objectives 5 and 7), or included in their Kington Town summary section. We would refer the KANP to the Kington Town Regeneration Implementation study 6th July 1998 by Architype Environmental commissioned by the Kington Development Trust which says of our premises :-
"the site could and should become a tourist attraction of regional importance"
"the future of Kington is clearly linked to the future of the Mill"
"There is no doubt in our minds that the Arrow Mill group of buildings could be a major catalyst for improving the fortunes of Kington"

We started our Garden Centre in 2001, the year of Foot and Mouth which devastated the Agricultural Community, and it has been steadily growing. We are now looking at plans for the future, including the use of our Historic set of Buildings, increasing employment, and would have appreciated the opportunity of discussing this with the KANP.

The Primary School and Little Orchard Nursery visit our Garden Centre and Animals to help with their education. We assist with the Kington in Bloom Competition and host the prize giving ceremony. We have hosted a Summer Festival in June for the past few years which has been very well attended. We are an integral part of the Kington Community so feel disappointed that we have not been involved in the Neighbourhood Plan, as local businesses should be.

6.1 *"Provide linked, circular safe cycling and walking routes around Kington and the wider area"* One of the main wishes from any public consultation has been the desire for a riverside walk along the Arrow (Policy KG1 and KANP Objectives 1 and 6) and that opportunity was available to the KANP to achieve such a walking route if they had consulted us.

KANP Objective 15. We have a 15kWh Micro Hydro system using our 19th Century Turbine so find it odd that the KANP have not been to see it or ask for our help in other projects. How will they provide support for schemes? When we host our Festival in June of each year we offer Mill tours and demonstration of our Hydro system. This tour is always oversubscribed and of great interest to the public.

9.2.3 *"It is a concern that the Conservation Area is currently on the national Heritage at Risk Register"*. We feel that the KANP should have researched into why this is the case and put forward proposals to take it out of the at risk register. We have three listed buildings on site and all are in a good state of repair. Have the owners of the "at risk" properties been approached?

Policy KANP KTC 1 - Kington Town Centre. We are members of the Kington Chamber of Trade and note that the only meeting that a representative of the KANP came to was on 21st February 2017 regarding traffic in the High Street (page 24 consultation). As far as we are aware that was the only discussion between the two groups.

We are very concerned by the *KANP KTC 1 - Kington Town Centre* policy in the Basic Conditions Statement as it appears to contradict itself and would cause problems. All deliveries for the Co-Operative store, Nisa and ourselves come via the High Street as well as all the Buses.

(viii) every opportunity will be taken to seek an enhancement to the overall environment of the Kington High Street to:

- a. reduce congestion and improve safety for all users*
- b. widen walking surfaces sufficient for all users*
- c. provide safer pedestrian crossing points linked to lanes behind the High Street and to the Primary School*
- d. improve street appearance and amenity*
- e. retain a route for buses and emergency vehicles in both directions*
- f. improve vehicular visibility at junctions each end of the High Street*
- g. provide clear definition of street surfaces for specific users*
- h. provide for safer collections/deliveries along the High Street*
- i. reduce traffic speeds and reinforce with traffic calming measures.*

*"Minutes of the Town Council Meeting held on Monday 12th December 2016
316-16 SUGGESTED HIGH STREET IMPROVEMENTS*

*Cllr Fitton placed three different suggestions before members ranging from complete pedestrianisation to one way systems He thanked David Raven who had contributed to the various proposals. During the discussions on the vehicular use of the High Street, it was also highlighted that alterations to the Hergest Road junction with Church Street should be included
RESOLVED.*

Members felt that a model with 'Shared Space' giving pedestrians priority over vehicles but that the traffic continues two way was the preferred option and it was hoped that the Neighbourhood Plan would consider Council's preference."

During events in the Town that require roads to be blocked we have always allowed traffic, particularly emergency vehicles, to exit via our premises. We are concerned that if traffic is deterred from using the High Street, it will start using our road as a "rat run". We should have been consulted as should other Traders in Town.

We do not believe that the consultation process has been carried out according to the Neighbourhood Plan Regulations and Guidance.

Yours sincerely,

Simon J Turner
pp. J. & P. Turner

Latham, James

From: Powell, Michelle (Council)
Sent: 04 October 2018 11:26
To: Neighbourhood Planning Team
Subject: RE: Kington Area Regulation 16 neighbourhood development plan consultation

Hi

I have read the NDP and I am happy with the contents.

Regards

Michelle

From: Housing Development
Sent: 03 October 2018 10:09
To: Powell, Michelle (Council) <Michelle.Powell@herefordshire.gov.uk>
Subject: FW: Kington Area Regulation 16 neighbourhood development plan consultation

One for you 😊

From: Neighbourhood Planning Team
Sent: 03 October 2018 09:52
Subject: Kington Area Regulation 16 neighbourhood development plan consultation

Dear Consultee,

Kington Town Council, Kington Rural and Lower Harpton Group Parish Council and Huntington Parish Council have submitted their Regulation 16 Neighbourhood Development Plan (NDP) to Herefordshire Council for consultation.

The plan can be viewed at the following link:

https://www.herefordshire.gov.uk/directory_record/3072/kington_kington_rural_and_lower_harpton_group_and_huntington_neighbourhood_development_plan

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

The consultation runs from 3 October 2018 to 14 November 2018.

If you wish to make any comments on this Plan, please do so by e-mailing:

neighbourhoodplanning@herefordshire.gov.uk, or sending representations to the address below.

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

Kind regards

Herefordshire.gov.uk

James Latham
Technical Support Officer

14th November 2018

Dear Herefordshire Council,

I wish to record my comments and objections to the Kington Area Neighbourhood Plan at Regulation 16.

I trust that Herefordshire Council will decide to not proceed with an examination of this plan with all the problems, weaknesses and controversy over it. However, I hope that the Examiner will support an oral examination of this Plan at that stage. I believe that the Kington public deserve the opportunity of hearing the KANP committee answering the Inspector, as there are many major disagreements. Neighbourhood Plans are supposed to be the wishes of the Community but this Plan has not taken notice of the public, only relying on advice from consultants and pressure from Herefordshire Council to find sites.

Please include my letter and email of 17.7.17 to the HCC Neighbourhood Plan team in the evidence as it also makes the point that this process has not been carried out according to the regulations.

Why was the settlement boundary altered before the Plan had passed referendum stage? Surely that was pre-empting the decision?

The consultation process has been deeply flawed in the case of Headbrook and. The public have never been asked directly whether they support the field as a housing site, or whether they want it designated as an LGS. Why was Headbrook Field (K10) not put on the questionnaire as a choice with the other housing sites? The public should have been given the opportunity to vote. The Locality Guidance notes for Neighbourhood planners state: - *The results of the site assessment, and the preferred options should be shared with the community, to allow people who live and work in the area to have a say in the option that the core group has proposed*". Refer you to Planning Application number P181494/0 submitted to HCC on 23rd April 2018. **This site should be allocated as a housing site as originally designated in the SHLAA report and as the KANP accepted up until 2016.**

Why were the Green Spaces not voted on separately as were the housing sites? There was never a choice between the Recreation Ground and Headbrook Field which was not actually named although the Steering Committee say that it was under River Meadows. How did the public know? The public were never told that if development took place on Headbrook there would be public open space, a Riverside Walk and benefits to the wildlife provided as part of the scheme. Throughout this process the question has never been asked directly whether the public want Headbrook designated as an LGS. In fact, there were several comments that the field would be ideal for development. The consultants to the KANP questioned the LGS designation. The Local Green Space designation for Headbrook should not be allowed as the field does not fit in with the regulations governing LGS (see below). There are many other better spaces in town already, one of which opposite Headbrook they want to destroy. Further, I note that it may be possible to reconcile the aim of the designation with developing the land. Presently, the site does not enjoy public access. An important benefit of allocating this site for housing will be the creation and protection going forward of public open space which will help to contribute, in part, to the underlying aim of that element of the plan Policy KG17 *make provision for green infrastructure and amenity space, including play facilities, community access to open space, and the linking of habitats into ecological networks within and surrounding the Town*". KANP Objective 1 and Policy KANP G1 refer to the same ideal. The plan at p.10 LGS states that *"GS06 attracted a large amount of support"* Where is this evidence? Page 8 of the Plan refers to *"historically interesting buildings"* on GS6 which is not the case. **The proposed designation, LGS6, should be deleted from the NDP as it does not comply with national planning policy.**

What is going to be the monitoring process? What is the plan if the proposed housing sites do not come on as hoped? The plan is obliged to find sites for 200 houses and even if the figures are accepted, there is no room for manoeuvre if one site fails to proceed. It has been told by former members of the Steering Committee that from the start no-one has liked the sites proposed but the KANP has felt forced into allocating sites by Herefordshire Council, but developers will build where they like. This is nonsense, as any Proposal will be scrutinized by Herefordshire Planning Officials and Committee who will only allow development in suitable places according to the Planning Regulations. Should the KANP have reserve sites listed? This draft plan is not in general conformity with the Strategic Policies of the Local Plan (i.e. that it is too restrictive such that it will frustrate the realisation of the Strategic Policies of the Development Plan). *“Given the level of constraints in Kington, the delivery of housing over the plan period will be closely monitored. If this monitoring process indicates that it will not be possible to deliver the required level of housing, the Council will use appropriate mechanisms to address the situation in accordance with Policy SS3.”*

The Housing Consultants did not attend a public meeting or report to the Town Council or the KANP Steering Committee. The Working Party appointed in 2015 did not meet the Consultants, neither did landowners. The two members of the Steering Group were the only people in the Town who met and gave their opinions to the Consultants.

There is a fundamental flaw with this process as far as a referendum, which could possibly be interpreted as infringing Kington Residents' Human Rights. There should be a judicial review into how Kington People may have this plan imposed on them by the Rural Voters.

The Steering Group have not taken notice of Town Councillors, and others, having reservations on the response to the survey. 61 respondents out of 1500 = 10.7% which could be repeated at a referendum.

Kington Rural and Lower Harpton achieved 8 replies from 284, Huntington 1 replies from 89.

The Kington Rural and Huntington residents appear to be happy with their plans so we can assume that most if not all will support the plan. This could be the 109 from the survey up to 373 if all turned out. If the same number turned out in the entire area in a referendum as replied to the survey that would be a total in the Plan Area of 270 meaning that a simple majority of 136 would win the vote. This leaves us with the situation where it would leave only 27 Kington Residents voting for the plan to carry the day against the 136 who would need to turn out and vote against. There are 14 Town Councillors plus the other member of the steering group leaving it requiring the group to persuade only 12 people to vote for it. This situation appears very heavily weighted against Kington Residents who would then have this plan forced upon them.

This KANP is not talked about in the Town and if you walk up the High Street and ask people about it there is very little response apart from the negatives. It has not spoken to anyone who has read it, let alone agree with it, and that includes Councillors. It has taken five years for the KANP to get to this point and the residents of Kington have just got fed up and are totally disinterested, particularly when they see that their views are always ignored. The publicity for this 6 week consultation has been very poor, only 3 notices in Town, both of which were bent over in the wind and rain, and neither in a position where someone could safely stop and read. Neither the Main Town Notice Board on the Market Hall or the notice board at Kington Park, or any of the usual shops where people normally look for information, had a poster. I respectfully suggest that you come to Kington and walk about, asking people about the KANP.

A questionnaire that only involved 10.7% of the population of Kington cannot be said to be representative.

The KLANP survey of 2013, distributed to 1420 Households had 253 replies and a large number of volunteers helping with the process. At one of the last meetings of the KANP on 12th February 2013 there were 11 present with 3 apologies. Volunteers of KANP have resigned over the last 3 years leaving only three regular members of the Steering Group. This clearly shows how public involvement has dwindled.

Scoping Report 2014

“Kington, Kington Rural and Huntington Group NDP should be informed by the findings of the SHLAA”

“The Study reveals that within the Kington area....

Extensive under provision of parks and gardens • Extensive over provision of natural and semi-natural green space • Under provision of amenity green space and average provision for outdoor sport • Average provision for children and young people”

The KANP have ignored the findings of the Scoping Report by designating more Green Space but not more amenity Green Space. Developing Headbrook Field (K10) would help bring forward the hopes of the Scoping Report in providing amenity space.

Neighbourhood Planning Regulations

“If the policies and proposals are to be implemented as the community intended a neighbourhood plan needs to be deliverable. The National Planning Policy Framework requires that the sites and the scale of development identified in a plan should not be subject to such a scale of obligations and policy burdens that their ability to be [developed viably](#) is threatened.”

Paragraph: 005 Reference ID: 41-005-20140306

The National Planning Policy Framework states that: *“To be considered 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 the site within five years and in particular that development of the site is viable (NPPF Footnote 11) and To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. (NPPF Footnote 12)*

The Government states: *“Must a community ensure its neighbourhood plan is deliverable? If the policies and proposals are to be implemented as the community intended a neighbourhood plan needs to be deliverable.”*

The sites chosen by the KANP are not all deliverable as described in the Regulations

The KANP sites as proposed will not deliver 200 houses.

“The following sites have been allocated in the KANP as shown on Plan 1:

- K1 – Land on Greenfield Drive, 2 dwellings
- K2 (3) – Land to the Corner of Llewellyn Road and Garden Close, 4 dwellings and garages
- K3 (5) – Site off Victoria Road, 10 dwellings
- K4 (8) – Old Wesleyan Chapel, Crabtree Lane, 10 dwellings
- K5 (9) – Field adjacent to Mill Street, 15 dwellings
- K6 (12) and K7 (13) – Land South of Kington, 100 dwellings”

K1 is already classed as an infill site.

K2 should be kept as an open space and availability is unsure.

K4 Old Wesleyan Chapel, 10 dwellings. I find it strange that the KANP are proposing 4 houses and 6 flats in this building when Kington Town Council have always been against more flats in Kington. I cannot understand how they also say that this building can be demolished. Has this been discussed with the Listed Buildings Officer at Herefordshire Council as the Chapel is an important Kington Building? There is planning history of over 70 years on this site without anything being progressed. So how can this site be deemed “deliverable”, or indeed viable? These properties would not have any parking or garden area.

K5 Field adjacent to Mill Street, 15 dwellings. The KANP say that a new access road will be required without any detail how this could be secured. There are also problems with ownership and tenancy rights. I do not believe that this site is deliverable or viable. This is also in the Conservation Area.

K6 Land South of Kington, 100 dwellings. This land also requires an access road and the KANP propose this through an established public open space and against the wishes of all the local residents. This goes completely against all the KANP's assertions that they want Green Spaces preserved. Herefordshire Council

have already refused an access road over this land in 2009 (Application DMNW/092216/F) and there is a restrictive covenant which prevents any use other than public open space. The KANP should explain how they conclude that this site is 'deliverable'.

The House of Commons Neighbourhood Briefing Paper Number 05838, 12 October 2018 states:-

"Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new Local Plan"

This is not done by the KANP

"Where a parish or town council chooses to produce a neighbourhood plan or Order it should work with other members of the community who are interested in, or affected by, the neighbourhood planning proposals to allow them to play an active role in preparing a neighbourhood plan or Order."

The KANP have not worked with the community, rather with Council Officials and Consultants against the wishes of the people.

Paragraph 1.83 of the Framework affords communities direct power to develop a 'shared vision.' Taking into account representations received during the Regulation 14 Consultation period, it is apparent that, with specific regard to the proposed allocation of development land South of Kington, there are members of the local community who consider public consultation to have been insufficient.

Given the above, there must be concern that the proposed land allocation is not the result of a shared vision.

I would also expect HCC or the Examiner to check that the Forum complied with Section:-

(7) A local planning authority—

(a) must, in determining under subsection (5) whether to designate an organisation or body as a neighbourhood forum for a neighbourhood area, have regard to the desirability of designating an organisation or body—

(i) which has secured (or taken reasonable steps to attempt to secure) that its membership includes at least one individual falling within each of sub-paragraphs (i) to (iii) of subsection (5)(b),

(ii) whose membership is drawn from different places in the neighbourhood area concerned and from different sections of the community in that area

"2013 A Steering Committee set up with representatives nominated by each of the 3 Councils October 2013. Terms of reference for Steering Comm agreed by each Council"

What were the terms of reference? What is the Constitution and has the Group followed it?

There should have been a quorum set for meetings.

The Regulations state: - *"(d) it has a written constitution"*

The Plan is the idea of two people who have pushed it through regardless of public opinion. They have misinterpreted the consultation answers, particularly on Green Spaces, and ignored the feelings from public meetings and the public exhibition notes. They have instead followed advice from Consultants and Council Officers, none of whom live in Kington. The HCC guidelines clearly state: - *"It is essential that the content of your Neighbourhood Development Plan represents the views of the wider community, not just those of the project group."*

KAN Plan QUESTIONNAIRE asked the question-

"Q5 Do you think the Green Spaces along the Arrow and Back Brook river corridors in Kington should be protected from development? (see map on page 2)"

This is clearly a leading question and should not have been included.

Planning Aid England guide says-

"There are a number of points you need to bear in mind when developing a questionnaire: ensure the questions are clearly written and are not leading (i.e. the question does not contain the answer you are seeking or a view you would like confirmed). For example, 'do you think open space is important' is a leading question as it is unlikely that the respondent would say no. The question 'are you able to access open space' may be more appropriate."

Aecom Locality Guide says- "Questions shouldn't be leading or ambiguous in their meaning, for example, the question should not contain a view that the QB would like confirmed. An example of a leading question would be 'Do you think open space is important?' as most respondents would answer yes to this question (and therefore not take you much further forward)."

The HCC guidelines state: - "It is important to ensure that the community supports the draft vision and objectives for the area as this will set out the overall aims of the plan and remit in which policies will emerge. Following this consultation, any necessary amendments should be made to the vision and objectives prior to developing the detailed content of the Neighbourhood Development Plan."

No amendments were made to the plan after representations made. It was also clear from the Public Exhibition and meetings in 2017 that the Community did not support the draft vision.

The Forum for Neighbourhood Planning states:- "Most groups and committees have 10 – 15 members whilst many others establish smaller working groups for particular issues such as housing or green space."

According to the regulations the group should consist of a minimum of 21 members. The KANP has never had anything like this number- see table below. Was there a quorum number set for meetings? The CPRE say "You may find it helpful to set up a Neighbourhood Plan project group. If you decide to do this, try to ensure that the project group includes a wide range of views, skills, knowledge and experience. A good size for a project group would be between five and ten people. Their job will be to oversee the process and preparation of your Neighbourhood Plan". The KANP had usually 2 or 3 people, none from business or commerce or young people.

Also, the regulations say that "The Local Planning Authority must consider whether the prospective neighbourhood forum has secured or taken reasonable steps to attempt to secure membership from each category and from different places and sections of the community in that area."

Can Herefordshire Council confirm that they are happy with the makeup of the group?

A statement which explains how the proposed Neighbourhood Forum meets the conditions contained in Section 1F(5), Schedule 9 of the Town and Country Planning Act 1990

"(5) A local planning authority may designate an organisation or body as a neighbourhood forum if the authority are satisfied that it meets the following conditions—

(a) it is established for the express purpose of promoting or improving the social, economic and environmental well-being of an area that consists of or includes the neighbourhood area concerned (whether or not it is also established for the express purpose of promoting the carrying on of trades, professions or other businesses in such an area),

(b) its membership is open to—

(i) individuals who live in the neighbourhood area concerned,

(ii) individuals who work there (whether for businesses carried on there or otherwise), and

(iii) individuals who are elected members of a county council, district council or London borough council any of whose area falls within the neighbourhood area concerned,

(c) its membership includes a minimum of 21 individuals each of whom—

(i) lives in the neighbourhood area concerned,

(ii) works there (whether for a business carried on there or otherwise), or

(iii) is an elected member of a county council, district council or London borough council any of whose area falls within the neighbourhood area concerned,

(d) it has a written constitution"

I have not been able to find the written constitution.

Local Green Space Designation. Can the KANP confirm that all the landowners whose land is designated as Local Green Space were contacted before the site's designation as set out in the Planning Practice Guidance on Local Green Space. Can they show copies of that correspondence? (Ref Examiner's Report to Storrington NP). I received a letter from Kingston Town Council dated 29th May 2018 informing me that land and any ownership has been identified as LGS, notification for LGS 4. According to the Map this is land at flood gates which is not under my ownership. I have not received a letter in regard to Headbrook land.

Comments on Basic Condition Statement

3.2 A Neighbourhood Plan will be considered to have met the Basic Conditions if:

- it has special regard to the desirability of preserving any Listed Building or its setting or any features of Special Architectural or Historic Interest

The KANP is not following this condition as they are promoting knocking down the Wesleyan Chapel, one of Kington's iconic listed buildings.

4. Conformity with National Planning Policy Framework (NPPF)

“Ensuring viability and deliverability

173. Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”

The KANP does not comply with paragraph 173 as they are proposing sites with severe constraints.

paragraph 16 of the NPPF

3.1 The Neighbourhood Plan must comply with the basic conditions set out in paragraph (2) of Schedule B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by Section 8A of the Planning and Compulsory Purchase Act 2004.

This regulation states: - *Requirements to be complied with before proposals made or considered*

4(1) Regulations may make provision as to requirements that must be complied with before proposals for neighbourhood development order may be submitted to a local planning authority or fall to be considered by a local planning authority.

(2) The regulations may in particular make provision—

(a) as to the giving of notice and publicity,

(b) as to the information and documents that are to be made available to the public,

(c) as to the making of reasonable charges for anything provided as a result of the regulations,

(d) as to consultation with and participation by the public,

(e) as to the making and consideration of representations (including the time by which they must be made),

(3) The power to make regulations under this paragraph must be exercised to secure that—

(a) prescribed requirements as to consultation with and participation by the public must be complied with before a proposal for a neighbourhood development order may be submitted to a local planning authority, and

(b) a statement containing the following information in relation to that consultation and participation must accompany the proposal submitted to the authority—

(i) details of those consulted,

(ii) a summary of the main issues raised, and

(iii) any other information of a prescribed description.

The KANP have not complied with section 2(d) and (e) and all section 3 as they have totally ignored the public feelings at meetings and not mentioned in the plan all of the objections.

“(2) A draft order meets the basic conditions if—

(a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,”

The guidance states: - *“In some circumstances more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies.”*

This has not been done as two of the main sites have no access.

Policy KANP GL Green Infrastructure.

Good intentions but how will this be achieved without Headbrook development which is ideally suited to support this Policy. The KANP knew of our proposal for a footbridge across the Arrow which would be a major help for "creation of new paths and access".

Comments on the Reg 16 consultation document

2.5 "The proposed allocation of this site, together with a proposed new access road, was the topic of the most frequent objections from residents."

Then why have the KANP taken no notice? That is not Public Involvement.

20th Sept 2014 public meeting - "A path along the river Arrow"

Why was this not pursued as they knew that the Headbrook development will be secured?

30th October 2014. Public Meeting held in Kington. Main Topic: The Environment

No mention is made of Headbrook Land as an important Green Space.

27th – 29th November 2014. Drop-in Planning for Real type event held in Kington Market Hall

"Most comments were on housing numbers, and possible locations. General desire to avoid large developments"

"The meadows either side of the river Arrow have flooded historically, only small area on north side would be acceptable for development. The rest should be left green"

"Headbrook meadow is a vital green space. Could this area become a public space?"

"These meadows are all an important amenity for the town and could be more so if there was public access to them. We need a flat riverside walk through the town that is accessible to disabled people"

These comments clearly showed that people want access to the riverside which can only be achieved by some development. The KANP ignore this.

30th November 2015 Special Meeting of Kington Town Council

"Opposition to building on green corridors adjacent to the river Arrow. A footpath along the full length of the river would enhance access to the area."

KANP ignored this.

14th December 2015. Kington Town Council meeting

"KTC members strongly opposed to building on either side of the river Arrow as they are wildlife corridors and should be retained as greenspaces only"

Incorrect advice given to the KTC as Headbrook Field is not a wildlife corridor. If development was allowed to proceed then there would be the possibility of a wildlife corridor and public spaces.

14th July 2016 Special Meeting with residents of Kington Park, Old Fardisley Rd, Kingswood Rd and Headbrook.

"Open to all members of the public" - Not true as it was only advertised in those three areas. Owners of other proposed housing sites were not told about this meeting.

February 2017 Meeting of the KANP Group

There was 3 members of the group including Rural, and one member of the public present.

This is not involvement and engagement of the public

18th April 2017 Meeting of Kington Town Council

"Councillors confirmed they wanted all spaces marked on maps to be designated greenspaces as integral to the town; a strong desire for a riverside walk to be developed"

Again, the KANP have ignored this advice.

30th May 2017 Letter received from Chair of Kingston Park Residents Association expressing concern that the proposed access road for K12 and K13 still shown going through Kingston Play Park Area.
"Points raised included: *Not one person at the packed meeting on 14th July 2016 spoke out in favour of the proposed access route. Route is unsuitable as goes through already heavily used road."
Again, the KANP ignore public involvement.

July 2017 Library Exhibition

KANP State Riverside Corridor through the town should be sustained by the designation of Greenspaces. This policy will not help opening the Riverside up to the public so is incorrect.

"The re-draft of the Plan document will address many of the comments from the consultation period including those made at this meeting"

The KANP have taken no notice of comments made. Also bearing in mind the 12% response rate for the questionnaire how can this be called Public Participation and involvement?

I have listened at the Kingston Town Council meeting where councillors were worried over the democratic process with such low turnout, especially if the same applied to a referendum.

KLAP Survey Results and KANP notes on consultations re Natural Environment

Green Spaces - A lot of responses but not one mention for Headbrook Land.

Several post-it note comments at the Exhibition are not included in this report. They all appear to be on the same theme which the Steering Group obviously do not want to repeat here:-

"Take note, Oh sorry, You don't do that!" (ref SHLAA landscape report on K12)

"What is going to happen to the notes and objections raised here? Will they go on record, or be ignored like so many comments that have been made during this "Democratic" process to date"

"What is the point of consultations when nobody listens?"

"What consultations? The Questionnaire which appears to have been largely ignored or the Public meeting which has been totally ignored"

On the question Do you support the proposed Boundaries? "No"

"Why have previous surveys been ignored in the preparation for this one. Have you "lost" the papers (and residents views previously expressed?)"

KTC Meetings 0.11.15 & 14.12.15

There are concerns over these notes not relating to the Minutes. Also refer to KANP Group meeting of 13.10.15 and why they changed their mind?

Some dates appear to be incorrect: - The minutes of the KTC meeting 0.11.15 have the date of 2.11.15 on the bottom of each sheet.

In the notes of the KTC meeting of 14.12.15 it is strange that the wording is in bold type as if to exaggerate the decision only two weeks after the previous meeting where they accepted some development.

Paragraph 15 in the Audit trail then contradicts this version of the minutes. "Concerns raised again on K6 and K10. Both in flood zone, except for small areas on both"

Paragraph 20 in the Audit trail on KTC meeting of 18.4.17 then says "Cllrs raised concerns again about allocating any of K10 (Headbrook)". This does not tally with the KANP consultation notes as above.

KANP Housing Sites Audit trail

"SC had information that an application might be made on (i)"

The SC met with us twice and knew definitely that an application was being prepared.

The letter from the Kingston Park Residents Association of 30th May 2017 clearly states the public unease with the consultation process and how the wishes of the meeting and indeed the questionnaire, have been ignored. The two people who are the KANP have persistently ignored any comments and carried on regardless with their ideas.

Kington Chronicle Special Edition

The KANP are overstating the facts by saying in Policies on Green Space: - *"The public's strong support for protecting all these spaces"*

This is not true as the public were not asked to differentiate between various Green Spaces. For example, it is obvious that no-one would want development on the Recreation Ground.

Summer Questionnaire.

The Questionnaire was sent to 1,500 households and only had 161 respondents - 10.7% response, not 12% as KANP document. (Compared to Kington Rural which had 38% response rate) They then say at the meeting *"if not ticked then assume you have not approved"*. This then could also apply to the 1,339 households who did not respond to the survey.

72 people thought K12 & K13 suitable - 45% yes, 55% no, a majority against.

Unfortunately, the public were not asked to vote on Headbrook, but even so 30 people mentioned it as a development site.

Bearing in mind the result of this survey and the letter from Kington Park along with the feeling of the public meeting, why did the KANP not look at other sites such as Headbrook? The Neighbourhood Plan process is supposed to be what the people want, not just the two people on the SC.

Herefordshire Council Development Management comments. *"Is there a need for all of the Green Space?"*

KANP reply *"Extensive discussions at Town Council meetings and in public consultations about designations of LGS (see consultation paras of section 9.10)"*

This is not correct regarding Headbrook land.

HCC have concerns on K3, K5, K6, K8, K9 being deliverable.

K12 & K13 they say *"Main concern relates to the inclusion of an illustrative masterplan as part of an NDP. Are there any examples of this being done elsewhere? The concern is that this seems to pre-determine any eventual planning application to an extent. For example, the illustrative sketch shows a significant number of three storey dwellings. Whilst there are such buildings in the town centre I am not sure that such an approach would be advocated elsewhere. However, a developer might argue that the supporting text directs towards such an approach. What is the agricultural land classification grading for the land? It is mentioned as a constraint for K15, but not here. Point of consistency."*

HCC say on Green Spaces *"The majority of these seem to fail the tests of paras 76 and 77 of the NPPF as they are extensive tracts of land..... The list seems unnecessarily extensive and should be re-assessed to have real value."*

Paragraphs 76 to 78 NPPF set out national policy on Local Green Space:

"76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.

77. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- where the green space is in reasonably close proximity to the community it serves;
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- where the green area concerned is local in character and is not an extensive tract of land.

In this Report of 29 October 2014 on the Backwell Neighbourhood Plan Examination, Mr McGurk began by observing that Local Green Space is a *"restrictive and significant policy designation"* equivalent to Green Belt designation. He held that *"it is essential that, when allocating Local Green Space, plan-makers can clearly demonstrate that the requirements for its allocation are met in full."*

There is no 'threshold' in terms of size which defines what would, or would not, fall to be considered as 'extensive tract of land'. In this regard the conclusions of other examinations of NPs are of assistance: (i) Sedlescombe NP - Street Farm being the size of several full size football pitches" at 2.6 has been considered extensive (Appendix D), (ii) Alrewas NP - two sites of 2.5ha and 3.9ha considered to be extensive (Appendix D), (iii) Atenhill NP - sites of 9.2ha and 2.3ha considered to be extensive (Appendix D). The Headbrook Land designation fails these criteria to be labelled Local Green Space.

John Amos states "At paragraph 9.4.7 the NDP appears to indicate that allowing for new allocations, consents implemented, commitments and an allowance for windfall that the NDP is positively planning for 208 dwellings. Nevertheless, at its meeting on 18/4/17 the Kington Town Council were informed that numbers of completions and approved applications from 2011 has been shown to be fewer than previous information so a late decision was made to increase numbers for the agreed allocations. No evidence is available to justify such a decision or to verify whether the increased numbers are feasible for each allocation. Nor is there any explanation given as to why K18 or other excluded candidate sites were not reconsidered in the light of this updated advice."

The Kington Town Council's official record of the agenda and minutes of this meeting have no mention of housing numbers or sites being discussed. In fact there were only five councillors present so it is unlikely that a major decision would have been taken. Who had taken the decision to increase the numbers on various sites? How were the public to know about these decisions as it was not on the agenda, not in minutes and there were no steering committee meetings held after February 2017 when the housing sites were not discussed.

Benbow states "Sadly, much of this document feels like it comes from Herefordshire Council not Kington" I agree, the entire KANP has been led by consultants and Herefordshire Council. When Kington people have had their say it has been ignored or as in the case of Green Space, misrepresented.

Comments on Reg 16 consultation document, regarding KANP replies to my letter submitted at Regulation 14 stage (I assume that this letter has been included in the evidence base for Regulation 16):

Para 1.2 wrote "We had two meetings at REDACTED in Novmber and December 2014 when you were made aware of our intention to submit a planning application on Headbrook which at that time was for 90 houses in one phase. Your committee was in agreement for a staggered scheme, although you envisaged perhaps 30 houses as a first phase and showed us a map of your suggested area. We told you that we would progress the scheme. We held a public exhibition of the plans in October 2015 which was well attended and with apparent support. After a great deal of discussion with Herefordshire Planning Officials and the Environment Agency we subsequently submitted a pre-application plan of which you were aware and received copies. We have since been working on a scheme taking into account Planning Officer feedback and are nearly ready to submit the application. We have not received any communication from you since 2014. Why have you not kept in discussion with us?"

The KANP have had no discussion since with us.

Para 2.2 asked "Your committee minutes of 8.12.15 stated "the constraints need further investigation". These investigations, surveys and inquiries take a great deal of work and time so it is very surprising that you have now decided to ignore them. Why?"

They have never been back to us on this then, or now in this statement.

Para 3.2 asked "You say in the Kington Chronicle on page 1 in the article on 100 houses South of Kington: - "In choosing this site we have been guided by a detailed consultant's report which shows this is the best option in minimising the impact on our high quality landscape". Please can you refer me to where they say this in their report?"

They still do not answer this question.

Para 4.13 asked "Your committee minutes of 8.3.16 state £6000 awarded to AECOM to produce plan on K12 & K13. When was this decided, by whom, and why only on that land? Why did you not ask that they also look at K10?"

If they cannot tell us the date how do we know that the site was already excluded?

Para 5.2 asked "Your committee minutes of 14.6.16 state "It was agreed that further public consultation of the draft plan... will be held in the autumn". Also proposed in your meeting of 13.9.16. Why was this consultation never held?"

The answer is that "Public consultation held in June 2017" assumed they mean the exhibition and subsequent meeting where all present were against the plan for one reason or another.

Para 6.2 sent a table with the attendance at the steering group meetings showing the declining numbers present: -

Planning Group Meeting Date	Committee incl Rural members	Members of the Public
10.3.15	6	1
14.4.15	6	2
9.6.15	7	1
14.7.15	9	4
8.9.15	6	1
13.10.15	7	8
8.12.15	6	0
8.3.16	5	2
10.5.16	5	3
14.6.16	6	2
12.7.16	5	1
13.9.16	4	4
11.10.16	4	3
13.12.16	4	2
14.2.17	3	1

The fact that meetings were open does not show public involvement in this plan as the above table proves. Where the public have been involved they have been ignored such as the survey results on the proposed large site and the meeting on the site being overwhelmingly against the scheme.

The 11th November 2015 public meeting in Kington on Townscape and Green Spaces attracted only 26 people including Councillors and Consultants. There was disbelief at that meeting that the landscape consultant did not know the course of the River. The attendance does not show strong support or interest for Green Spaces.

Para 7.2 asked "In the original survey 92% said that remaining green spaces to have protected status, but this would refer to the Recreation ground, Greenfields and the School playing fields which are the areas that most people think of as the Town's Green Space, and not to Headbrook field or indeed any other field next to the Town. Goldwater's survey says of Headbrook - "do not retain a wealth of biodiversity or archaeology". Neighbourhood Plan Greenspace assessment of Headbrook Field (Site 6) states only 6 people surveyed said that this area should be protected. 34 respondents said Recreation Ground which supports my view. Where is the data that most people want the Headbrook field designated as Green space? What was the question in the Survey on Green Space? (The link on your web site to the survey does not work) "

I believe that the question that they are basing their case that it was "supported by a majority in all consultations" is incorrect. The main thing that I would say that as all Green Areas were included in this question including the Recreation Ground that no-one is going to propose development on it. Headbrook should have been given a separate question on its own, as they did with housing sites.

Para 3.2 wrote "I refer to the Kington Character Appraisal by your consultants in 3.03 IV8 from the Tanyard Lane and IV9 views from Headbrook West, these views are not affected by any development on K10. Why do you consider that development on K10 will affect the Landscape views around Kington when your consultants do not?"

Where is this Clinker (CML) (2017) report to be found?

In Appendix 4.7 Key Features of Kington Town including lists of Facilities, Open Spaces, Key Views and Landscape Features? Source: OHA Character Appraisal-Kington Town 2015"

"There are numerous internal views: the following were identified as the main views that contribute to the Town's character:

IV7 Up and Down Bridge Street

IV8 From Tanyard Lane (East)

IV9 From Headbrook (West)

IV10 Up and Down Duke Street and Victoria Road

There are also directed views along the narrow roads, and especially the network of walled footpaths around the town."

Why have you not gone with this report?

Para 3.5 asked 3.5 "we have been guided by a detailed assessment of how the landscape impact can be minimized" Why did you not wait for the assessment of Headbrook land as you originally asked for? You knew that we have received pre-application advice from Herefordshire Council on this."

They have no comment

Para 10.1 wrote "4.15 "The River Arrow and its flood plains are located to the south of the Town Centre" There is no flood plain near Kington. The flood plains are much further down the River at Eardisland/Monkland. Do you agree?"

The difference of opinion is whether areas at risk of flooding can be classified as flood plain"

Para 12.3.3 Agreed which makes the KANP stance even more baffling

Para 14.2 wrote "14.2 Headbrook is within the original settlement boundary. The settlement boundary was extended to include the land south of Kington at Town Council Meetings on 30.11.15 and 4.12.15. Why was this done before the plan is approved? Official Minutes of 30.11.15 do not mention any discussion on extending settlement boundary and at least two councillors in the discussion have interests in sites discussed. Official Minutes of 4.12.15 do not mention any discussion on extending or agreeing the settlement boundary:-

"The following sites were agreed for inclusion but at a lower density than 5 per hectare to mitigate landscape impact. The figures in parenthesis are of capacity in relation to the hectare"

Site Capacity

K10 15(24) lower figure because of flood plain and impact of development on the landscape and biodiversity of the river meadow corridor.)"

Councillor in the discussion has interests in sites discussed. K10 was recommended for 15 houses. Then in the minutes of 4.1.16 when the Council confirm the minutes of 4.12.15 they add "by unanimous vote, area K10 was excluded as a potential housing site". This could not have been the case as the total sites agreed came to a total of 107. If the Headbrook site had been excluded the total would have been 92. Councillors voting have interest in other sites. "It was agreed that former Councillor Bradbury's full notes on the meeting of 14th December could also be circulated to Councillors". Is this normal practice to go by a member of the public's notes rather than the official record?"

The reply does not answer this important question of the legality and justice of the decision making.

There were two Councillors present with a personal and prejudicial interest in the KANP who declared an interest, but were able to vote.

"Council was invited to consider proposed changes to UDP Settlement Boundary"

From my notes of the meeting the Mayor, who is also chair of the KANP, and Mrs Bradbury told them that they had to agree to this change as Herefordshire Council Officers had told them that it must happen.

Para 15 wrote "9.4.29 "approximately a 10 minute walk from the High Street". Why ignore the Headbrook site which is much closer to the amenities and residents do not have to cross the road for the bus?" It is one of many factors but an important one in the sustainability of the site.

Para 16 wrote "9.2 states "The designation should only be used: where the green space is in reasonably close proximity to the community it serves; where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and where the green area concerned is local in character and is not an extensive tract of land." I contend that Headbrook Field does not come under this category. Do you agree? The KANP reply does not understand this site at all. In no way does it meet the criteria as laid down.

Para 17 Difference of opinion. We believe that if development is allowed then this whole area will be opened for public access as asked for in all the consultations. Undeveloped it does nothing for Kington life.

Para 18 wrote "Appendix 1 - How many respondents identified GS06 & GS26 as a local Green Space? "Watermeadows north of Headbrook" - These are in fact Meadows. Kington KLAP Action Plan & Report on the KLAP Survey - Link does not work on the website so I have not been able to gain access to the information on the original survey. Where can I find it? " No reply to these questions and the link still not working in October 2018

Para 19 wrote "Appendix 14 Flood Risk Zones. - The course of the River Arrow is shown incorrectly. Will you correct it please? This Map also clearly shows Headbrook development area being well out of Flood zones, so why are you still describing it as being at risk of flooding?" A detailed assessment has been made by our consultants with the Environment Agency, but the KANP have never asked to see it.

Para 20 wrote "Reference: - "Kington Character Assessment" by Mark Owen. This is another link that does not work on your website. " This link still does not work in October 2018

Para 21 wrote "Kington Town Council Meeting 30th November 2015 - "KTC members strongly opposed to building adjacent to R Arrow, Headbrook Meadows" - The official minutes do not in fact state this, as the Council decided on some development with a "lower figure because of floodplain and impact of development on the landscape and biodiversity of the river meadow corridor". Please clarify. Also why do you say "adjacent" as there will be a buffer zone for amenity use and a riverside walk?" Reply does not answer the question

Para 22 wrote "Kington Town Council Meeting 18th April 2017 - "Councillors confirmed they wanted all spaces marked on maps to be designated greenspaces as integral to the Town". Only 5 councillors present including one with an interest in other sites. This comment is also not recorded in the official Council minutes. Please can you clarify the record?" Reply does not answer the question

Para 23 wrote "I refer you to Martin Fitton's interview on You Tube - He says in the interview that AECOM came and advised them on sites and spent 2.5 days in Town. We did not meet them, or were informed of their presence, although they did recommend that Headbrook needed further study. Why was Headbrook then dropped even though AECOM thought that it could work and your committee were following their advice?" They still do not answer this question.

Para 24 wrote "Reference the Report of meeting to discuss the South of Kington Site for residents of Kington Park, Old Eardisley Road, Kingswood Road and Headbrook held on July 14th 2016 in Kington "Cllr Martin Fitton, Chair of the Kington Neighbourhood Planning Group explained the reasons for the two fields between Kington Park and Kingswood Road being identified as the most suitable location for the largest site. He recounted the advice that had been received from specialist planning consultants, architects, and a landscape planning specialist who had been engaged to assist the Planning Group to identify possible suitable sites. All the specialists had agreed that it was the location least likely to damage the landscape setting of the Town. He also explained why other sites that had been suggested had not been found to be suitable"

"The specialist's reports will be available on the website and at the main public consultation event expected to be held in October/November.

Cllr Fitton also explained and identified green areas in the Town that will be proposed as protected green spaces on which no development will be permitted."

We were not invited to this meeting (Audit trail para 18 and KANP report of the meeting where only residents close to the scheme were invited and no notice was only put on Kington Park; the rest of the Town knew nothing about this meeting.) So did not have an opportunity of putting our views. The majority of people were against the access and yet that opinion has been ignored. I cannot find any line in any of the consultant's reports that state it was the location least likely to damage the landscape setting of the Town". Please refer me to the reports where that is stated."

The KANP have taken no notice of the feelings of this public meeting or the survey where well over 50% said that they did not want development there.

Appendix

Appendix 2

4. "March 2015 SC agreed to a Working Party: one SC member and 5 volunteer residents to seek further sites." According to the SC minutes there were 7 SC member and 5 residents on this working party and four of those are neighbours to the Headbrook site and biased against it. This working party never met the Consultants and I can find no record of their reporting back to the SC or meeting again. It is noticeable that only the chairman met the consultants later that year to discuss sites.

"K10 Land to the north of Headbrook; would result in loss of green space and have landscape impact on the Town. (24)"

The Aecom report actually says "K10 – Land to the north of Headbrook – Further consideration (through discussion with the Local Planning Authority) should be given to access and the impact of new housing development in terms of loss of open green space and the landscape character of the area."

We have been following original HLAA, KANP and AECOM advice in putting an application forward which will provide much needed housing while at the same time providing Public Open Space and a Riverside Walk.

"Concerns raised again on K6 and K10. Both in Flood Zone 2, except for small areas on both, climate change needs to be noted as a long-term factor; sites are either side of River Arrow that is a landscape feature and there are biodiversity issues."

They have rejected Headbrook land on incorrect facts which originally, they asked to be discovered. Why did they not wait or ask for them? The A map on page 26 clearly shows that land is outside flood risk

22. "10.8.17 Kington Town members of SC met to review comments received during Reg 14 consultation."

There are no minutes of this meeting available, also no details of who was present.

At the same time Carly Inker wrote: - "1.1 In July 2017, I was commissioned to review and comment on landscape matters in relation to the current draft of the Kington Area Neighbourhood Plan (NP). I was instructed by members of the NP steering group. 1.2 At an informal meeting that I attended with members of the steering group and their NP advisor in early August." These meetings are not listed in the Audit Trail.

Copies of Emails between MJT and KANP

Email from Claire Rawlings 1.08.2008

Dear Mr Turner,

Thank you for your email which expresses your concern that Site HLAA/263/001 has been identified as available in 16-20 years time. I will discuss this next week with my boss Mr Botwright on his return from leave.

It is understood that as the landowner you are promoting the site and it is therefore available. The use of the word 'available' in our assessments takes into account site constraints and builds that into the timescale for when the site will be ready for development.

The main site constraints identified relate to access, site integration and the fact it is identified as flood zone 2.

A flood study was undertaken for the River Arrow in 1995. This study has been considered and rolled into an updated Strategic Flood Risk Assessment for the County. All potential housing sites will be fed through the SFA. This may result in a review to the flood information contained within this study.

Any information that you have regarding how the site will be accessed would also be helpful.

I hope this is of assistance and I will contact you again next week.

Regards,

Claire Rawlings, Senior Planning Officer, Herefordshire Council,

Email from Martin Turner to PDA Planning Consultants 22.10.2014

I have had a meeting with Martin Fitton and Ros Bradbury, part of the steering group for the Neighbourhood Plan, and can report the following:

Kington has to have 180-200 houses over the next few years.

The group would prefer staggered build time.

They have made an analysis of the potential sites in Kington and have identified the Headbrook field as having potential. They come up with a development of perhaps 30 houses, mainly on the west of the site. Public access along the river is important.

They are looking for well designed houses, the standard of houses on the Maesyderi estate horrified them.

Giving the houses alongside Headbrook a breather space at the rear is an idea of theirs.

The next stage is public exhibition at the end of November when they are going to present their findings and gauge the public response.

I told them that we have considered putting this land forward for many years and have been quietly working on the flood area and access. I told them that we have always been advised by a planning expert and waiting for the right moment to go ahead.

The consensus is that a meeting with them and us would be beneficial, and I said that I was sure that you could come up with a proposal quite soon! They are available on Monday 10th November if that is convenient for you, at a time to suit you, possibly here. It would be useful if a Communion Architects could attend as the design and layout is important to the group.

Email from Martin Fitton to Martin Turner 3.11.2014

Dear Martin Turner

Many thanks for meeting us to discuss the possible allocation of your land for housing development. We look forward to further discussion with you as we develop our housing proposals in the Plan.

The additional purpose of this note is to confirm that we now intend to make public our initial thoughts about the allocation of housing land. We propose to do this in the supplement in the November Kington Chronicle which will cover our various NDP policy proposals. At the end of November we will also identify the sites when we have an extended public consultation in the Market Hall where maps will be displayed showing various proposals. These maps will identify the sites in general terms and we do not intend to be specific about numbers, density and type of housing, as this will require further discussion with you as we have already agreed. Nor will we identify ownership.

I trust you are still happy for us to do this but let me know if it is a problem.

Regards

Martin Fitton

Email from Martin Turner to Peter Draper 27.11.2014

Hello Peter,

I have visited the local plan exhibition and having seen it and having spoken to Martin Fitton and Ros Bradbury, I think it best not to exhibit our plans there. They have already received some adverse comments from neighbours and do not want to be seen to endorse our proposals by having them on display. I have suggested a further meeting with them on the morning of 10th December to show them our revised plan. They are still saying that they are in agreement with development on the site, but that it should be staggered. I told them that I did not know if that could be achieved in planning terms even if we wanted to.

Email from Richie 29.11.2015

Hi Peter,

At 7pm tomorrow (Monday 30th) at DPS there is to be a special Full Council Meeting to consider the consultants reports on proposed housing sites in Kington. We Councillors have had printed papers. We will also consider the "Green Spaces" proposals (I should have put links to Lewis Goldwater's reports on the web-site but I haven't found a moment to do this - yet!). I don't know how many of the Public will have noticed that this meeting is taking place - let alone been officially invited or informed of it directly.
Richie

Email from Richie 29.11.2015

Phew: All links and documents are now up on the KANPlan website on the "Latest News" & "Information & Resources" pages.
Visit: http://kingtonareaplan.org.uk/?page_id=13

11.08.17 MJT to Martin Fitton

Hello Martin

I was very interested to read the results of your recent survey which show a majority, 89/161 or 55.3%, against the large housing estate between Kingswood Road and Eardisley Road. I assume therefore that you will now be reconsidering your view on other sites, in particular the Headbrook land for which there were 18 comments in support even without the site being listed.

16.08.17 Martin Fitton to MJT

Hi,

Thanks for this.

We are in the process of reviewing the Plan in relation to detailed written comments including yours and Mr Drapers and the questionnaire responses and notes left in the library exhibition.

With regards to the questionnaire we'll need to consider a range of issues. For example does the low response (about 11%) show that the unresponsive 89% are broadly OK with the Plan and that of those responding over 80% expressed support for the local green space identified.

Your comments and others and our response will be attached to the revised Regulation 16 Plan which we expect will be ready by the first part of September.

I will be in contact again at that time.

Regards
Martin Fitton: Chair KANPlan

16.08.17 MJT to Martin Fitton

Hello Martin,

Thank you for your reply.

I think you are incorrect in assuming that the 89% who did not complete the questionnaire were broadly OK with the Plan. I believe you should consider instead that those people are against the whole idea. I remember that over 450 people replied to the earlier questionnaire and only 161 responded to this one. This clearly shows lack of involvement and interest. It would be very perilous to proceed with only 11% likely to vote in a referendum.

There was not a question asked whether people wanted this Plan. It was also very telling at the recent public meeting in the Primary School that not one person stood up and said what a good plan it was. In fact,

everyone who spoke was against it as were all the comments at the exhibition. The result of the questionnaire was that the majority of people are against your main housing proposal so I cannot understand how you are proceeding to the next stage as soon as September without fundamental alterations.

The minutes of Kington Town Council's Environment committee on 17th July 2017 state "Concern was expressed that some members of the public misunderstood the purpose and nature of the Neighbourhood Plan.....It is to be stressed at the public meeting that those sites identified might be sites for future development , if there is demand in the future" This is misleading as according to the Herefordshire Core Strategy 200 house will be built in Kington before 2031.

The questionnaire asked "Do you think the Green Spaces along the Arrow and Back Brook corridors in Kington should be protected from development?" The first thing to say is that Headbrook land is only a proposed Green space on the map on page 2 but the question does not make that clear. The question is then asked "Any other Green Spaces in Kington you think should be protected?" You did not ask if any of the Green spaces marked should not be protected. It is obvious that no-one would object to the Recreation Ground, School Playing Fields or the Football pitch being protected so the question was very one-sided.

I still await your reply to my original representation.

Best Regards,

Martin

Minutes of Meetings that are important to read in understanding a chain of events and lack of public consultation and involvement. They also show that the Town Council did not have all the facts when considering the Plan at their meetings.

KANP Group Meetings (See table for attendance numbers (Never 21 as regulations state))

Minutes of a meeting held on Thursday 19th September 2013

3. Status of the Group After discussion of whether it should remain as a task and finish group or be a formal Joint Committee of the Councils it was agreed to proceed with it as a T&F Group for the time being and that consultations take place on what would be required if it becomes necessary to set up a formal Joint Committee.

Minutes of a Meeting held on 23rd October 2013 in Kington

"There will be a need to set up sub groups to work on specific issues to which individuals with key skills can be coopted."

Minutes of a Meeting held on 24th March 2014 in Kington

"CF reminded the meeting that any Councillor may attend meetings of the Group but only persons appointed by their Council are entitled to vote."

"A list of people, with their contact details, who have offered to help, was collected. RC and CK were thanked for their organisation and producing publicity.

It was agreed to contact everyone who had made an offer of help"

"d) Work groups should be set up on the agreed themes eg employment etc. with interim reports from the groups by mid July. Action RB and MF"

It was agreed that fliers/short descriptions of NDP work and requests for volunteers to join the topic groups be produced to be sent to: (1) All local groups (2) To be placed in prominent places eg pubs, shops, library, schools etc (3) To be handed out via stall on Kington Past Day, fetes and similar events (4) Placed on noticeboards etc (5) To provide the text for the Home Page of the Website. Action MF, RB and RC

It was agreed that there will be a meeting of all volunteers to discuss the work and to set up the Work Groups"

Minutes of a Meeting held on 10th March 2015 in The Old Police Station, Kington

"It was agreed that a Working Party of interested people should be formed and would meet to consider the suggestions made in more detail, to prepare a report for the Committee. Group to consist of: Ros Bradbury, Brian Brown, Ian Caney, Richie Cotterill, David Raven."

Minutes of a Meeting held on 14th April 2015 in The Old Police Station, Kington

Kington Town Housing Site Group reported that the group had met and reviewed a number of sites in some detail, including several that one member had identified as possible for a small number. The next meeting to be held shortly will walk around some of the sites. It was agreed that Angela Rush could join the group.

Minutes of a Meeting held on 8th September 2015 at the Old Police Station in Kington

Sam Rossili who does not live in Herefordshire spent several hours in Kington with MF and RB who together showed him all the identified possible development sites indicated on the map, including Hergest Camp and its surrounds.

On 8th September MF and RB had met with LG, MO and CT in Hereford with SR in communication by phone. Progress to date was described and discussed.

Minutes of a Meeting held on 8th December 2015 at The Old Police Station, Kington

K6 and K10 both recognised as occupying important green spaces which should be protected from development, important landscape features; desirable to have public access to the river corridor; concern about the flood plain; the constraints need further investigation.

K12, K13 and K14 general support for further investigation of the feasibility of using the sites to offer a unified scheme that would include facilities and landscaping. Carly Linkler, the landscape consultant had made been present and gave her assessment: that although the sites if developed would be visible from some points it would be less intrusive location than most others

Minutes of a Meeting held on 8th March 2016 at The Old Police Station, Kington

MF reported that he, RB and Claire Rawlings had met the previous day with S. Riddle (Forward Planning /SLHAA) and Karla Johnson (NDP Support Officer) to review the list of sites identified for housing in Kington Town. Hereford Council expects KANDP to identify sufficient sites required under the Core Strategy so it is helpful to discuss the site selections with Council Officers and seek their views.

Minutes of a Meeting held on 14th June 2016 at the Old Police Station, Kington

It was agreed that since residents of Kingswood Road and Kington Park would be the most affected by any developments on K12, K13 and K15 there should be a special meeting for those residents to enable them to view the draft Masterplan.

It was agreed to: hold the meeting on **Thursday July 14th at 7.30 pm in the Burton Hotel *******

liaise with the Residents Committee of Kington Park, send a letter of invitation to the consultation meeting to every household of Kington Park, Kingswood Road and nearby households on Headbrook.

It was agreed that further public consultation of the draft PLAN covering the whole neighbourhood area will be held in the autumn, probably towards the end of October

Minutes of a Meeting held on 13th September 2016 at the Old Police Station, Kington

Report on discussions with Officers from HC Forward Planning.

MF and RB had met with officers to ask that HC provide advice as to suitability of sites K12 and K13 as well as KR1 at Lower Hergest.

MF explained that HC has the responsibility of assessing whether the sites would be acceptable for development, using HC's Strategic Housing Land Assessment criteria. If HC were to deem the sites unsuitable then it would be unwise to recommend them in the Plan because on inspection the Plan would not be acceptable.

The Committee felt that if possible consultation should be in November in a suitable location in Kington

Minutes of a Meeting held on 11th October 2016 at the Old Police Station, Kington

"MF reported that sections of the Plan are now being drafted and Clare Rawlings will be working on it during the next couple of months.

It was agreed that a public consultation at a venue in the town booked for one week could take place in February 2017. There would be wide publicity beforehand."

This public consultation never took place!

Minutes of a Meeting held on 13th December 2016 at The Old Police Station, Kington

MF reported that CR had suggested that he should meet with Herefordshire Council Officers to review progress and to set a schedule of work in 2017 with the intention of having a whole draft Plan prepared by Easter.

A record of all meetings, consultations etc. needs to be compiled to provide evidence of community involvement to this stage; RB will draft

Minutes of a Meeting held on 14th February 2017 at The Old Police Station, Kington

MF reported that he and RB together with Claire Rawlings had met with HC Officer to review progress to date

This appears to have been the last of the meetings. Perhaps because as there was only 3 present it was not worth having any more?

Four main points come out of these meetings.

1. Very poor attendance, well below 21 as set out in regulations
2. Two people appear to make all the decisions and do all the work
3. Great reliance on advice from Herefordshire Council and Consultants. Where is the local involvement?
4. Attendance rates get progressively less as the process went on to where at the last meeting it was only MF, RB & CRW. How can they, after bringing points for discussion at the meeting, then vote on it? Surely there must be a quorum or at least other opinions expressed?
5. A working party was formed in April 2015 but was soon disbanded. One member, Ian Caney, was listed in attendance at the following group meeting but at subsequent meetings was listed as a member of the public and not part of the discussions.

Kington Town Council Meetings

(Unfortunately, not the best start as less than half the Council turned up at what was supposed to have been a celebration of KLAP's work. Shows very little interest even at this stage. Indeed 4 of the 6 councillors present were at that stage the members of the NP steering committee)

Minutes of the Town Council Meeting held on Wednesday 2nd October 2013

2 members of the public present and 2 members of Kington Local Action Plan present

PRESENT

Cllr. Ms C. Kibblewhite
Cllr. Mrs J. Reid (from 7.25 pm)
Cllr. Mrs R. Bradbury
Cllr. Mrs C. Forrester
Cllr. Mr B Widdowson
Cllr Mr M Fitton

APOLOGY

Cllr D East
Cllr. Mrs S. Williams
Cllr Mr J Atkinson
Cllr. Mr H. Jones
Cllr. Mrs. E Rolls
Cllr. Mr J. Ford
Cllr. Mr T Bounds
Cllr. Mrs E. Banks
Cllr Mrs K Birchley

4. 188-13 KINGTON LOCAL ACTION PLAN

Members of Kington Local Action Plan presented their report together with the Action Plan for consideration of the Council. The members of Kington Local Action Plan were thanked for all the hard work undertaken by the group in producing their findings.

The contents of the Action Plan was then discussed in depth.

RESOLVED

The Council recognises the considerable work undertaken by and accomplished by the Kington Local Action Plan Group.

It recognises that the Survey Report published in June 2013 reflects comprehensively the views of the Community.

The Council recognises the draft Action Plan and will ensure that its points are discussed by and with relevant bodies and appropriate action taken.

Minutes of the Town Council Meeting held on Monday 7th October 2013

119-132 TERMS OF REFERENCE OF THE NEIGHBOURHOOD PLANNING GROUP

The Terms of Reference having been previously circulated were discussed. It was reported that the Neighbourhood Planning process would cost in the region of £150k of which the majority would be raised in the form of grants.

RESOLVED That Kington Town Council agree to accept the extended Terms of Reference

Minutes of the Town Council Meeting held on Tuesday 6th May 2014 and Meeting 5th May 2015
5 Councillors proposed to work on NP Committee

Minutes of the Town Council Meeting held on Monday 13th October 2014

CONSULTANT FOR THE NEIGHBOURHOOD PLANNING PROCESS

This item was discussed at length; Members were supplied with a tabled report. It was explained that two consultants were required

1. To deal with Planning
 2. To deal with the Local Green Space
- Two consultants' quotations were obtained for both areas

Planning Consultant

Given our specific need for expert advice on the drafting of our planning policies so that they meet government planning guidance, and specifically, to maximise the local control we can gain through the NDP by focussed policy wording, and ultimately satisfy the Assessor of the Plan, we recommend the appointment of Consultant A because of their long and close involvement in preparation of strategic planning documents and their current involvement in advice to other NDP groups.

Minutes of the Town Council Meeting held on Monday 1st June 2015

112-152 TO RECEIVE A REPORT IN RELATION TO THE NEIGHBOURHOOD PLAN

This was tabled by Cllr Fitton.

Cllr Fitton also tabled an emergency request for the appointment of consultants for the Neighbourhood Plan, to provide landscape assessments, site biodiversity values and guidance on layout and sustainable architecture. Cllr Fitton explained that this was an extraordinary appointment, **bypassing the usual procedures** as the group had been awarded a grant, with a very short timescale for the spending of the money. Cllr Fitton requested a special meeting of the full Council on Monday 7th July 13th to brief all members.

RESOLVED It was agreed that Kington Town Council would hold an additional full Council meeting on Monday 7th July 13th for further update and full briefing on the Neighbourhood Plan.

Minutes of the Town Council Meeting held on Monday 13th July 2015

REPORT IN RELATION TO THE NEIGHBOURHOOD PLAN FROM THE NEIGHBOURHOOD PLAN GROUP

Cllr Fitton gave his presentation on behalf of the Neighbourhood Plan Group (Kington Town). His presentation showed areas within the town boundary which could be considered for housing. He stressed that those areas were just identified areas, no emphasis was placed on where they were suitable or not, however any issues had been identified and recorded.

Minutes of the Town Council Meeting held on Monday 7th September 2015 - No mention

Minutes of the Town Council Meeting held on Monday 5th October 2015 - No mention

Minutes of the Town Council Meeting held on Monday 2 November 2015

210-15 TO RECEIVE QUESTIONS FROM COUNCILLORS

Cllr Fitton: the next KNAP event is to be a Townscape Consultation event on November 11 with Mark Owen and Lewis Goldwater. Councillors were encouraged to attend.

Cllr Fitton: requested a special full council meeting on 30th November, jointly with the Kington Rural and Lower Harpton Group, and Huntington Parish Councils for the Neighbourhood Planning Group to present their draft proposal on planning sites and green spaces for acceptance by Kington Town Council.

Cllr Fitton would like this to be a normal council meeting with public access at the same level as all full council meetings. A public consultation meeting would follow on from this at a later date.

The Clerk clarified that Councillors from the Neighbouring Parishes could be invited to attend as members of the public, and make comments in that capacity. However, they would not have any voting rights and would need to have further discussion and any decision-making at their own Parish Council meetings.

Minutes of the Town Council Meeting held on Monday 30th November 2015

215-15 THE REPORT FROM THE CONSULTANT IN RELATION TO THE NEIGHBOURHOOD PLAN

Background

A range of housing sites have been considered by our consultants and agreed by the NDP Steering Committee on 13 October for inclusion in the draft Neighbourhood Plan. In an extensive discussion on 30 November 2015 Kington Town Councillors discussed further refinements to the list. This paper presents the revised list to take forward.

The purpose of this paper is to seek Council guidance on

- the proposed sites for housing and their capacity to be included in the draft Plan

The Herefordshire Council Core Strategy and the Neighbourhood Plan

The Neighbourhood Plan must conform to the Core Strategy which has now been adopted following the Examination in Public.

Because the Plan Period began in 2011 completions and existing planning permissions, of which there are 40, count towards the total. Therefore sites for 155 dwellings are now required. To meet this allocation the NDP Steering Committee considered 20 sites within the town. These sites were identified by the Steering Committee, community groups and landowners.

The Proposed Sites. The attached map shows the location of all 20 sites reviewed.

The following sites were agreed to be allocated with the maximum density of 35 dwellings per hectare, the density specified in the Core Strategy.

Site	Capacity
K1	2
K3	4 (flats/maisonettes)
K4	
Plot A	2
Plot C	4
K5	10
K8	5 (chapel) + 4 (land) = 9
8.10pm Cllr. Banks left the Chamber	
K20	2
8.17pm Cllr. Banks returned to the Chamber	
TOTAL	33

The following sites were agreed for inclusion but at a lower density than 35 per hectare to mitigate landscape impact. The figures in parenthesis are of capacity in relation to the hectareage.

Site	Capacity
K6	15 (30) (lower figure because of flood plain and impact of development on the landscape and biodiversity of the river meadow corridor.)

8.35pm Cllr. Laurie left the Chamber

K9	12 (14) (lower figure because of flood plain, and access will have to be resolved)
----	--

9.10pm Cllr. Laurie returned to the Chamber

K10 15 (24) (lower figure because of floodplain and impact of development on the landscape and biodiversity of the river meadow corridor.)

K12 20 (35) (lower figure because of site topography and to mitigate landscape impact)

K13 45 (72) (lower figure because of site topography and to mitigate landscape impact)

Total 107

The following sites were excluded:

K2 (Because of impact on existing green space)

K7 (the landowner is not interested in development and the importance of the site for the agricultural economy strongly militates against change of use.)

K11, K14, K15, K17. These sites were excluded because of their elevation or visibility and thus potential detrimental impacts on the landscape. In addition they would fall outside the proposed settlement boundary which is to be designated for the whole of the town as part of the NDP process.

K16 May need further review because of access problems to Kingswood Road; it is also outside the draft settlement boundary.

K18 could provide encouragement for further development to the east of the A4111 main road which should be avoided.

K19 would be adjacent to the new waste site and thus be at variance with national planning policy. Discussion

With the 40 extant permissions and completions the identified sites provides a total of 180 dwellings though this could increase given further decisions on housing type and size.

The proposals for K12 and K13 mean they would be the largest developments and for this reason we have asked our consultants to look more closely at potential landscape impact of the developments. Our landscape and townscape consultants (Carly Inker/DHA Architects) have provided the attached further assessment of the sites in relation to the landscape context.

Recommendation

Members are asked to agree to take forward the sites and capacity figures to meet the housing allocation.

Minutes of the Town Council Meeting held on Monday 7 December 2015 - No mention

Minutes of the Town Council Meeting held on Monday 14th December 2015

311-15 FURTHER REFINEMENTS IN THE REVISED HOUSING SITES IN RELATION TO THE NEIGHBOURHOOD PLAN.

Kington Neighbourhood Plan.

Following the meeting which took place on Monday 30th November where the group was tasked to further refine the numbers allocated to the various sites.

Members were reminded that a range of housing sites have been considered by our consultants and agreed by the NDP Steering Committee on October 13 for inclusion in the draft neighbourhood plan. In an extensive discussion on November 30th Kington Town Councillors discussed further refinements to the list. This will then inform the drafting of the Neighbourhood Plan policies and be the basis for further consultation with the community. The draft plan that emerges will then be subjected to independent examination and finally to the public referendum.

The purpose of this paper is to seek Council guidance on

- the proposed sites for housing and their capacity to be included in the draft plan

The Herefordshire Council Core Strategy and the Neighbourhood Plan

Because the plan period began in 2011 completions and existing planning permissions, of which there are 40, count towards the total. Therefore sites for 155 dwellings are now required. To meet this allocation the NDP Steering Committee considered 20 sites within the town. These sites were identified by the Steering Committee, community groups and landowners.

The Proposed Sites

The attached map shows the location of all 20 sites reviewed.

The following sites were agreed to be allocated with the maximum density of 35 dwellings per hectare, the density specified in the Core Strategy.

Site	Capacity
K1	2
K3	4 (flats/maisonettes)
K4	
Plot A	2
Plot C	4

This site was discussed and it was suggested that further evaluation should be undertaken before a final decision could be made on this site.

K5	10
K8	5 (chapel) + 2 (land) = 9

It was agreed that the maximum should be 30 in whatever configuration.

8.10pm Cllr. Banks left the Chamber

K20	2
8.17pm Cllr. Banks returned to the Chamber	
TOTAL	33

The following sites were agreed for inclusion but at a lower density than 35 per hectare to mitigate landscape impact. The figures in parenthesis are of capacity in relation to the hectare.

Site	Capacity
K6	15 (30) (lower figure because of flood plain and impact of development on the landscape and biodiversity of the river meadow corridor.)
K9	12 (14) (lower figure because of flood plain, and access will have to be resolved)
K10	15 (24) (lower figure because of flood plain and impact of development on the landscape and biodiversity of the river meadow corridor.)
K12	20 (35) (lower figure because of site topography and to mitigate landscape impact)
K13	45 (72) (lower figure because of site topography and to mitigate landscape impact)
Total	107

Discussion

With the 20 extant permissions and completions the identified sites provides a total of 180 dwellings though this could increase given further decisions on housing type and size.

The proposals for K12 and K13 mean they would be the largest developments and for this reason we have asked our consultants to look more closely at potential landscape impact of the developments. Our landscape and townscape consultants (Carly Inker/DHA Architects) have provided the attached further assessment of the sites in relation to the landscape context.

Following discussion in relation to sites K12 and K13 it was felt that again further work should be undertaken in relation to these sites on the visual impact and highway issues.

Minutes of the Town Council Meeting held on Monday 4 January 2016

004-16 TO CONFIRM AND SIGN THE MINUTES AS A TRUE RECORD OF THE MEETING HELD ON MONDAY 30th NOVEMBER, 7th AND 14th DECEMBER 2015.

After the addition of the consultant's name and other minor corrections, the minutes of the meeting held on Monday 30th November 2015 were accepted and signed as a true record.

The minutes of the meeting held on Monday 7th December 2015 were accepted and signed as a true record.

After minor corrections, including the following: 'by a unanimous vote, area K10 was excluded as a potential housing site', the minutes of the meeting held on Monday 14th December 2015 were accepted and signed as a true record by the Mayor.

It was agreed that former Councillor Bradbury's full notes on the meeting of 14th December could also be circulated to Councillors.

Minutes of the Town Council Meeting held on Monday 1 February 2016

TO RECEIVE AND UPDATE ON THE NEIGHBOURHOOD PLAN

Cllr Fitton presented an update (previously circulated) and recommended that he be permitted to present monthly updates for the next few months.

Cllr Fitton added that he was waiting to hear the results of his Awards for All bid, and that he should hear from the Locality Grant panel within the next seven days.

Minutes of the Town Council Meeting held on Monday 7 March 2016

049-16 TO RECEIVE AN UPDATE IN RELATION TO THE NEIGHBOURHOOD PLAN

Cllr Fitton confirmed to members that all grant applications had been successful and were being spent on Locality and Technical work. The Big Lottery money would be used to help finish the work and presentation to the public.

There is the need to keep Herefordshire Council officers apprised of what stage the Neighbourhood Planning Group are at. Cllr Fitton confirmed that he will be able to present a more in-depth report on the Group's activities at the next meeting of the full Council.

Minutes of the Town Council Meeting held on Tuesday 3 May 2016

195-16 TO AGREE APPOINTMENTS OF COUNCIL REPRESENTATIVES ON THE FOLLOWING OUTSIDE BODIES

- Neighbourhood Planning

Cllr Banks

Cllr Widdowson

Cllr Fitton

Cllr Williams

Minutes of the Town Council Meeting held on Monday 6th June 2016

219-16 REPORTS FROM COMMITTEES CHAIRS

Cllr Fitton reported that the Planning Committee had recently objected to a recent planning application as the land had been deemed unsuitable by the Neighbourhood Plan Group.

Cllr Fitton reported that the Neighbourhood Plan Group had received a draft report on planning sites and will bring it to the next meeting of the full Council.

Minutes of the Town Council Meeting held on Monday 4th July 2016

Questions in relation to the Neighbourhood Plan were asked around why some sites had been retained and others taken out from suggested development sites.

Minutes of the Town Council Meeting held on Monday 1st August 2016

June, Minute note 219 -16. Cllr Fitton to bring Draft of Neighbourhood Plan to the Council. It was confirmed that Cllr Fitton would bring this to the October meeting of the full Council.

Minutes of the Town Council Meeting held on Monday 3rd October 2016

Another member of the public expressed concern over the seemingly secretive nature of Neighbourhood Planning meetings. He had sent several questions to the Chair but had no response, and was concerned that important decisions about planning sites were being made behind closed doors.

Cllr Fitton responded, explaining that some of the Neighbourhood Planning meetings were of the steering committee group but that members of the public were welcome to all meetings.

The Member of public gave the Mayor an envelope with further questions and concerns for her to look at.

274-16 UPDATE ON THE NEIGHBOURHOOD PLAN

Cllr Fitton updated members. The Plan is almost at the planning Consultant's final write-up stage and Cllr Fitton is hopeful that it will be finished by the end of the year. A further full public consultation will take place, once the Plan policies are drafted.

Minutes of the Town Council Meeting held on Monday 7th November 2016

291-16 UPDATE ON THE NEIGHBOURHOOD PLAN

Cllr Fitton gave a verbal update on progress:

i) The Housing Settlement Boundaries work was completed and being made into a full report.

ii) It has been difficult to identify sites for potential Housing Association new-builds in Kington and there might be more possibilities at the Arrow View site.

Minutes of the Town Council Meeting held on Monday 5th December 2016

297-16

DECLARATIONS OF INTEREST

Name of Councillor	Item	Personal	Prejudicial
Cllr Laurie	12- Neighbourhood Plan	✓	✓
Cllr Banks	12- Neighbourhood Plan	✓	✓
Cllr Widdowson	11- Asset Transfer	✓	✓

307-16 UPDATE ON THE NEIGHBOURHOOD PLAN

(Cllr Laurie leaves the room at 19.45)

Cllr Fitton gave a verbal update on progress:

The main framework is ready. There is a meeting on 12th December to discuss proposed improvements for the High Street and all Councillors are encouraged to attend.

Minutes of the Town Council Meeting held on Monday 12th December 2016

313-16

DECLARATIONS OF INTEREST

Name of Councillor	Item	Personal	Prejudicial
Cllr Banks	12- Neighbourhood Plan	✓	✓

316-16 SUGGESTED HIGH STREET IMPROVEMENTS

Cllr Fitton placed three different suggestions before members ranging from complete pedestrianisation to one-way systems. He thanked David Raven who had contributed to the various proposals. During the discussions on the vehicular use of the High Street, it was also highlighted that alterations to the Hergest Road junction with Church Street should be included.

RESOLVED:

Members felt that a model with 'Shared Space' giving pedestrians priority over vehicles but that the traffic continues two way was the preferred option and it was hoped that the Neighbourhood Plan would consider Council's preference.

Minutes of the Town Council Meeting held on Monday 9 January 2017 - No mention

Minutes of the Town Council Meeting held on Monday 6 February 2017 - No mention

Minutes of the Town Council Meeting held on Monday 6 March 2017 - No mention

Minutes of the Town Council Meeting held on Monday 3 April 2017 - No mention

Minutes of the Town Council Meeting held on Tuesday 18th April 2017

078-17 UPDATE FROM THE NEIGHBOURHOOD PLAN Cllr. Fitton gave a full briefing of the current position with the Neighbourhood Plan, he emphasised that the plan was not ready for submission under Reg 14 however the group thought it prudent to update members of the current position pending the formal presentation to Full Council which he hoped would be in early May.

One member of the public made a lengthy presentation in relation to the Neighbourhood Plan, the full contents were to be received in due course. At the time of writing this document has been received and the Neighbourhood Plan Group have had a copy.

Minutes of the Town Council Meeting held on Monday 8 May 2017

195-17 TO AGREE APPOINTMENTS OF COUNCIL REPRESENTATIVES ON THE FOLLOWING OUTSIDE BODIES

Neighbourhood Planning Cllr Mrs Banks Cllr Fitton Cllr Forrester Cllr Hawkins Cllr Widdowson

199-17 UPDATE ON THE NEIGHBOURHOOD PLAN Mayor Martin Fitton advised members that the draft plan has been submitted and the consultation would begin on 30th May. Mayor Fitton expressed his thanks to former Councillors Richie Cotterill and Celia Kibblewhite for their help in compiling the document. There is to be a special meeting of Full Council on Monday 15th May to discuss further.

Minutes of the Town Council Meeting held on Monday 15th May 2017

6 councillors present, 3 absent

208-17 THE DRAFT NEIGHBOURHOOD PLAN Cllr. Fitton gave a full update on the current position with Kington Neighbourhood Plan. He drew members attention to various aspects of the plan. He stated that it was the groups view that the draft plan was ready for submission to Herefordshire Council. It was proposed by Cllr. Widdowson that under Regulation 14 the plan be submitted the was seconded by Cllr. Hawkins and agreed by all. RESOLVED Under Regulation 14 that the plan be submitted to Herefordshire Council

Minutes of the Town Council Meeting held on Monday 5 June 2017

215-17 TO RECEIVE A REPORT FROM THE MAYOR

May has been dominated by completing the Kington Area Neighbourhood Plan (KAN Plan) for Regulation 14 submission, preparing the special issue of the Kington Chronicle which summarises the plan and the exhibition which will be housed in the library during the six-week consultation which will start on June 5th. Thanks are due to Ros Bradbury, Richie Cotterill and Celia Kibblewhite who have aided this work. May 16th: Attend Huntington Parish meeting to present Regulation 14 Draft of the KANP. Agreed unanimously.

May 18th Attend Kington Rural Parish Meeting to present Regulation 14 Draft of the KANP. The Plan agreed with a modification to the Settlement Boundary at Hergest/Arrow View.

Minutes of the Town Council Meeting held on Monday 3 July 2017

232-17 TO RECEIVE A REPORT FROM THE MAYOR The Mayor reported that this time had been taken up with the Neighbourhood Plan and he had not attended any other functions.

239-17 TO RECEIVE AN UPDATE ON THE NEIGHBOURHOOD PLAN Mayor Fitton confirmed that there will be a public meeting to discuss the NDP on Thursday 27th July.

Cllr Atkinson suggested that some of the terminology used in the plan had seemed ambiguous and had caused some misinterpretation.

Cllr Fitton agreed to add an explanatory note to the library and shop window display.

Minutes of the Town Council Meeting held on Monday 7 August 2017

254-17 INFORMATION ITEM: TO RECEIVE UPDATE ON NEIGHBOURHOOD DEVELOPMENT PLAN

Mayor Fitton updated members: The final consultation meeting had been held and there had been general support for the potential identified housing sites.

The NDP group were still looking at the submitted questionnaires and comments. The NDP group expected to need further discussions and some revising of the plan before it was considered complete.

Minutes of the Town Council Meeting held on Monday 4 September 2017

269-17 INFORMATION ITEM: TO RECEIVE UPDATE ON NEIGHBOURHOOD DEVELOPMENT PLAN

Mayor Fitton reported that the Neighbourhood Planning Group was currently working through the modifications that had been suggested at the consultation stage. He planned to bring this document to a later meeting for further discussion once all the modifications have been completed.

Minutes of the Town Council Meeting held on Monday 2nd October 2017

290-17 NEIGHBOURHOOD DEVELOPMENT PLAN UPDATE

Cllrs. Banks and Cllr. Laurie declared a disclosable pecuniary interest in this agenda item and left the room.

Cllr. Fitton provided a preliminary report into the results of the Regulation 14 consultation. A full report will be provided to the December meeting.

Following feedback from both Herefordshire Council and the Environment Agency it was proposed to exclude previously identified housing sites: K20, on the advice of the Neighbourhood Planning Team at Herefordshire Council on the grounds that this extended beyond the plan boundary, K6 on the advice of the Environment Agency and Balfour Beatty as this included areas identified as flood plain and K15 on the advice of the landscape architect due to the impact on the landscape. A change to the windfall application numbers was also suggested, estimates for which were considered too low.

Some concern was expressed that removing these potential housing sites would result in an increase in density of the remaining housing locations to meet target housing requirement.

After some discussion it was resolved to accept these recommendations with 5 votes for, 2 against and 1 abstention.

During discussion, a member of the public questioned the value of the Neighbourhood Planning Process and the impact perceived on property nearby to proposed development sites which he felt there was little or no demand for. The meeting was reminded that there was a requirement to identify sites to meet national housing targets and if not identified in a Neighbourhood Plan site allocation would be made by Herefordshire Council. By preparing a Neighbourhood Plan, Kington retain local control over the choice of sites. Cllrs. Banks and Laurie returned to the meeting at this end of this agenda item.

Minutes of the Town Council Meeting held on Monday 6th November 2017

310-17 UPDATE ON NEIGHBOURHOOD DEVELOPMENT PLAN AND CONSIDERATION OF AMENDMENTS TO GREEN SPACES AND DEVELOPMENT BOUNDARIES Cllr. Fitton presented an update on the progress of the Neighbourhood Plan and proposed changes following the Regulation 14 consultation in preparation for Regulation 16 submission to Herefordshire Council. After some discussion, it was agreed to defer this agenda item to the next meeting in order to be in a position to consider corrected maps showing open space designations.

Minutes of the Town Council Meeting held on Monday 4th December 2017

http://www.kingtontowncouncil.gov.uk/UserFiles/Files/Minutes/27025-Full_Council_Minutes_-_4.12.17_.pdf

During the Regulation 14 Consultation we have received comments from the Statutory Bodies, from the public and from landowners who have interests in the various development sites. In addition we have had further questionnaire responses largely supportive of the plan though the response was low (12%). Note: Consultants suggested removing fields as LGS north and south of River Arrow at an house Meadows and Headbrook. There has been strong consistent support for these to be LGS throughout the plan preparation they will be outside the redrawn BSAs will Tattymore, Fleece Meadow and adjacent field south of K5. All these areas meet most, if not all, the criteria for LGS and will be detailed in the Plan text. The drawings of a possible scheme for developing the large housing site that were in the Draft document will not be included since we are not designated developers.

Minutes of the Town Council Meeting held on Monday 8th January 2018

008-18 NEIGHBOURHOOD DEVELOPMENT PLAN Mayor Fitton updated members on this. The draft Neighbourhood Development Plan was now ready to go to the consultant for checking and ultimately for independent examination under Regulation 16. Mayor Fitton anticipates that the Plan will be ready for referendum in June or July: this will depend on the Local Authority's workload. Mayor Fitton thanked former councillor Roz Bradbury for all her invaluable work on the Neighbourhood Development Plan.

Minutes of the Town Council Meeting held on Monday 12th March 2018

043-18 NEIGHBOURHOOD DEVELOPMENT PLAN Members noted a verbal report from the Mayor on the progress of the Neighbourhood Development Plan. Amendments are being incorporated into the plan document as agreed for submission to Herefordshire Council under Regulation 16.

Minutes of the Town Council Meeting held on Monday 9th April 2018

066-18 NEIGHBOURHOOD DEVELOPMENT PLAN Members noted a verbal report from the Mayor on the progress of the Neighbourhood Development Plan. The Regulation 16 Document is very near to completion and the Plan should be ready for submission within the next two weeks. After this, there will be a further six-week consultation period, a referral to the External Examiner and a local referendum all of which will be Herefordshire Council's responsibility.

Minutes of the Town Council Meeting held on Monday 14th May 2018

083-18 TO A NOTE REPORT FROM RETIRING MAYOR Mayor Fitton gave a verbal report on his past year in office. Much of this time has been taken up with the Neighbourhood Development Plan and he gave hearty thanks to Roz Bradbury for all her help with this.

Minutes of the Town Council Meeting held on Monday 4th June 2018

http://www.kingtontowncouncil.gov.uk/UserFiles/Files/Minutes/47287-FC_Minutes_04.06.2018_-_complete_and_approved.pdf

Town Council Environment Committee Meetings

Minutes of the Environment Committee Meeting held on Monday 21st September 2015

Env 026-15 7. STANDING ITEMS FOR DISCUSSION
Community/Neighbourhood Plan

It was reported that additional funding had been secured. Also, that a meeting will be arranged for the consultants to report back their findings to Councillors

The exact same wording is in the minutes for several of the meetings in 2016:-

Env 021-16 8. STANDING ITEMS FOR DISCUSSION
Community/Neighbourhood Plan

Cllr. Fitton gave a detailed update in relation to the current position of the plan and funding in place

Minutes of the Environment Committee Meeting held on Monday 18th July 2016

Env 028-16 6. STANDING ITEMS FOR DISCUSSION
Community/Neighbourhood Plan

Cllr. Fitton reported back from the Neighbourhood Planning meeting about the proposed housing development on and off the Kingswood Road. He reported a lively meeting with interesting points raised at the meeting, and, more expected from local residents comments invited, to be directed to Ros Bradbury via the Old Police Station) Vehicular access was of great concern to most people who had attended.

Cllr. Fitton is pressing for a decision on this from Herefordshire Council.

Kington Town Council Planning Committee Meetings

Minutes of the Planning Committee Meeting held on Monday 7th June 2013

Plan 038-13 THE NEIGHBOURHOOD PLAN

It was reported that Lyonshall had established their Neighbourhood Area. It was reported that Kington Rural had resolved that they would join with Kington Town Council. It would suggest contacting Huntington as a neighbouring parish. It was also agreed that a small steering group be formed to take this matter forward, this was delegated to the clerk in conference with Cllr. Bradbury

Minutes of the Planning Committee Meeting held on Monday 27th January 2014

Plan 014-14 THE NEIGHBOURHOOD PLAN

It was reported that the next Neighbourhood Planning group had met and a small group had been formed to look at it and which was available in Kington for housing

Minutes of the Planning Committee Meeting held on Monday 16th June 2014

Plan 050-14 THE CORE STRATEGY

The response to the Core Strategy was discussed. It was highlighted that the response had to be with Herefordshire prior to the council meeting.

RESOLVED

That response be formulated by Cllr. Bradbury and circulated to all Councillors for any observation, prior to the submission date.

2015 meetings - no mention

2016 meetings - No mention

2017 Meetings - No mention

22 October 2018

Dear Sir / Madam

**Kington Neighbourhood Plan Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

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

About National Grid

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

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

Specific Comments

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

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

Key resources / contacts

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

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



Electricity distribution

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

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

Hannah Lorna Bevins
Consultant Town Planner

n.grid@amecfw.com

Wood E&I Solutions UK Ltd
Gables House
Kenilworth Road
Leamington Spa
Warwickshire
CV32 6JX

Spencer Jefferies
Development Liaison Officer, National Grid

box.landandacquisitions@nationalgrid.com

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

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

Yours faithfully

[via email]

Hannah Lorna Bevins
Consultant Town Planner

cc. Spencer Jefferies, National Grid



PETER DRAPER ASSOCIATES

Yew Tree House, Byford, Hereford HR4 7LB
T: 01981 590500 & 07831 105423
E: info.pdaplanning@gmail.com
W: www.pdaplanning.co.uk

Town & Country Planning Consultants
Land, Property and Development Consultants

**REPRESENTATION STATEMENT on behalf of Mr Martin Turner regarding the
Kington Area Neighbourhood Plan Regulation 16 Draft of September 2018**

Project: Representations on the Kington Area Neighbourhood Plan Draft September 2018

Reference: HR.1010617.NP.Turner.Reg16

Client: Mr Martin Turner, **ADDRESS REDACTED**

Executive Summary:

E.1 Mr Martin Turner has requested that PDA Planning represent him in matters concerning Kington Area Neighbourhood Plan (KANP) including the current Regulation 16 draft issued in September 2018. We have made representations earlier including with regard to the draft Plan of June 2017.

E.2 In this regard and on behalf of Mr Turner, we object very strongly to the Draft Plan as published, including much of the policy and proposals within it and to specific text elements within the draft document and the reasoning and conclusions therein.

E.3 Principal amongst the objections is the inclusion of a substantial area of private land, 3.8 hectares/9.5 acres in extent and commonly known as the Headbrook Land (HL) and owned by Mr Turner, which has been shown on the draft Proposals Map as being designated as an area of Local Green Space (LGS). Not only is this policy and proposal totally unacceptable to Mr Turner and, in our opinion, without legal or even moral foundation, it is wholly inappropriate, as shown, for the needs of the town, the local community and Herefordshire. We consider it contrary also to the Herefordshire Local Plan-Core Strategy 2015 (HLPCS) and to the overarching housing and planning policies pursued by the government through the National Planning Policy Framework (NPPF), both in its original form and the recent NPPF 2 of July 2018 and associated legislation. Furthermore we can find no evidence whatsoever of a case of need being put forward for this proposal in this form; nor any evidence of how and why it has been proposed; nor any evidence or evaluation of alternative areas for this LGS designation; nor, and in particular, any evidence of any consultation regarding the designation undertaken with Mr Turner.

E.4 Within the context of a proposed LGS designation and the need for new housing in Kington, we question strongly why the significant HL area, which is within Kington's traditionally well-defined built-up area and should be included in the draft NP's defined settlement boundaries, has not been evaluated properly and considered for a residential development designation on part of it. On these grounds of a lack of proper evaluation, we object to the draft KANP for not including an appropriate part of the HL as an alternative for housing in place of the LGS designation, or at least alongside it.

E.5 The Neighbourhood Plan Group (NPG) will be aware that the HL is the subject of a current application for planning permission for residential development on about 1.0 hectares/2.5 acres of the area, together with substantial public open space of at least 1.8 hectares/4.5 acres, covering over 64% of the total planning application area. On behalf of Mr Turner we submitted copies of our original draft development proposals to the Local Planning Authority (LPA) as a Pre-application Enquiry in 2015 and also to Kington Town Council (KTC) and the NPG for their information and with invitations to discuss the proposals in depth. This was followed by a major exhibition held in Kington where our draft proposals were displayed in great detail for public inspection and comment and CD copies were made for members of the public to be fully informed. We instigated an initial attempt at discussions also with the NPG as early as 2014.

E.6 During this period and to date the KTC and the NPG have generally failed to respond to our draft proposals and no meetings have been held by the NPG or invitations made

for discussions and involvement with Mr Turner. Hence, from the very start of the KANP proceedings, the NPG have had no real contact at all with Mr Turner, who is the owner of one of the most significant areas of land within the plan area and the draft Plan policies. This is contrary to claims within the draft Plan and the consultation statements of June 2017 and 2018 that local landowners have been consulted (or 'engaged') on all neighbourhood plan matters and that insufficient sites for development were found as a result. This is further at odds with a Local Plan need for at least 200 new dwellings in Kington and in the context of the NPPF requirement for LPAs to have at least a 5 year supply of readily available and deliverable housing land – which Herefordshire cannot currently provide – and the Government's present emphasis on an urgent need for greatly enhanced levels of new housing, especially affordable housing, throughout England and particularly in rural areas. On the grounds of a lack of, or indeed, of no consultation, with Mr Turner in the context of land available for new housing within the town, we object most strongly to the current draft KANP.

E.7 As the HL is shown to be not included in any form as a suitable and potential site for housing development when plainly it has many attributes to fulfil local housing need as well as Kington's additional community and open space desires, we object to the draft KANP. Our grounds are that a suitable part of the HL should be included as a designated housing site to fulfil the Local Plan housing policy for appropriate local need housing and for the required affordable housing.

E.8 The foregoing represents the major elements of our objections and representations to the draft KANP, on behalf of Mr Turner. There are also additional points and matters within the draft on which we make representation and these are addressed in the following parts of our statement and particular representations and/or objections are highlighted as necessary in bold text.

1. Background:

1.1 Peter Draper is the principal of PDA Planning / Peter Draper Associates, first established in Herefordshire in 1993. Peter Draper is a qualified Town Planner, holding a Diploma in Town & Country Planning from Nottingham Trent University. He was first elected as a Member of the Royal Town Planning Institute in 1975 and was a Chartered Town Planner for over 30 years, but has chosen to relinquish membership in recent times. He is a Fellow of the Property Consultants Society, first elected in 1983 and has held previous Memberships of the Incorporated Association of Architects and Surveyors and the British Institute of Management. He has had extensive experience of Town & Country Planning and Land, Property & Development matters in both the Public and Private sectors.

1.2 Mr Turner has requested that PDA Planning represents him in matters concerning Kington Area Neighbourhood Plan (KANP). In this regard, on behalf of Mr Turner, we object strongly to the draft plan as published including specific policy and proposal items within it.

1.3 Principal amongst the objections is the inclusion of the substantial area of private land, 3.8 hectares/9.5 acres in extent and known as the Headbrook Land (HL) owned by

Mr Turner which is being shown in its entirety on the Proposals Map as an area for designation as a Local Green Space (LGS). Not only is this proposed designation totally unacceptable to Mr Turner and, in our opinion, without legal or even moral foundation, it is wholly inappropriate for the needs of the town, the local community, for Herefordshire and the Herefordshire Local Plan-Core Strategy 2015 (HLPCS) and for the overarching housing and planning policies pursued by the government through the National Planning Policy Framework (NPPF). Furthermore we find no evidence of a case of need being put forward for this proposal; nor any evidence of how and why it had been proposed; nor any evidence or evaluation of alternative areas for LGS or how the HL will be utilised or acquired; nor any evidence of consultation undertaken whatsoever with Mr Turner.

1.4 Within the context of a proposed LGS designation we question strongly why, with other significant areas of open land within and adjacent to the town both already existing (such as the Mill Street Recreation Ground) or being considered for LGS designation, why the HL land is being included also. We would emphasise strongly that the HL land is:

- Privately owned with no public access whatsoever.
- Agricultural land with no public access and used primarily for sheep and cattle grazing
- Land which has been identified in the past by the LPA through its Strategic Housing Land Availability studies and other similar assessments as being appropriate for some future residential development which will contribute to Kington's housing needs.
- Land within the built up parts of Kington and which is linked sustainably to the town centre and its main services and facilities.
- Land upon which an outline planning application is currently being considered by the LPA (7 months and counting since submission and validation), for which extensive studies have been undertaken over the past 2 years or so to ensure that all planning and other issues are evaluated and satisfied properly.
- Land that the KANP authors are well aware is available for appropriate future development, yet have chosen to ignore and, importantly, have failed to discuss with or engage with the landowner during KANP preparations.

1.5 On these grounds we object, on behalf of Mr Turner, to the draft Plan for including this land solely for LGS designation and for not including it for consideration for future residential development.

1.6 The Kington Town Council (KTC) and Kington Area Neighbourhood Plan Group (NPG) should have been well aware that the HL was the subject of a pending application for planning permission for residential development and a subsequent submission. On behalf of Mr Turner we submitted, in August 2015, copies of draft development proposals to the Local Planning Authority (LPA) as a Pre-Application Enquiry (PAE). We sent copies of the PAE and all associated material, which we are not necessarily obliged to do, to the KTC and NPG as well as to local residents for their information and an invitation to discuss the proposals. However, the KTC and NPG noticeably failed to respond to this at the time, other than a general acknowledgement of receipt. This is

very much at odds with the claim within the draft KANP that local landowners have been consulted or 'engaged' on all neighbourhood plan matters and that, as a result, no suitable sites for development have been found other than those identified in draft Policy KANP H1 - Housing Delivery: Kington Town.

1.7 With regard to the draft Plan's overall policy for housing, we consider that Policy KANP H1 is fundamentally flawed and does not fulfil either Local Plan or NPPF requirements. It claims to meet a large part of Kington's housing needs for at least 200 new dwellings with 35% for affordable housing. However, it appears to us that 100 of these dwellings are to be found on just two linked sites (K6 and K7) off Kingswood Road. These land areas formed parts of earlier sites that have been evaluated several times since 2007 by the LPA in their Strategic Housing Land Availability Assessment (SHLAA) studies. The essential conclusion of the LPA has been that these sites are wholly unsuitable for residential development, primarily for landscape, environmental, access and general infrastructure reasons. In addition, a site for 15 dwellings (K5) off Mill Street appears to have very limited access and possible ownership problems and it may be debatable whether this site is wholly suitable for development or would come forward easily. Furthermore, the site including the Old Wesleyan Chapel off Crabtree Lane (K4), targeted for 10 dwellings, has been a controversial one for many years with regard to its overall suitability for development and the fact that the Listed Building is in a poor state of repair. So, again, it may be debatable whether this site is appropriate for development or would be deliverable.

1.8 Hence we have a position where at least 125 out of the claimed 140 housing allocations, or effectively at least 89% of the allocations, are on land considered either unsuitable for development by the LPA or with question marks about their suitability for delivery. These are sites that would also be expected to fulfil the 35% affordable housing allocations, while the remaining allocations are small, effectively 'windfall' sites, with room for no more than a handful of potential dwellings on each site, totalling around 16 units, which, because of their small sizes, are unlikely to achieve 35% affordable housing levels.

1.9 Despite this, the draft KANP puts these sites forward as the major plank in its overall housing policy. Furthermore, the sites have been included without any, or at least only a basic modicum of, proper evaluation and assessment as to their suitability, whereas Mr Turner's HL site has been the subject of very extensive and time consuming assessments with detailed studies having been undertaken by noted professional consultancies with regard to issues of flooding (and in conjunction with the Environment Agency), traffic and highways, housing need, the local environment and ecology/biodiversity and the local landscape. These in turn have been discussed with the LPA and other similar bodies and with the local Kington community.

1.10 It would seem also that the draft KANP housing proposals, until now, have had minimal exposure to the wider community or to local landowners and there appears to be a distinct lack of a choice of alternative strategies having been put forward for closer scrutiny. Indeed, the only public meeting that seems to have been held, in July 2016 – and we are not quite convinced that this was convened as a recognizable meeting where all of the Kington public were able to consider alternative strategies – there was a very

considerable body of disquiet about the prospect of sites K12 (now K6), K13 (now K7) and K15 being put forward unquestioned and yet some two years on these sites are being advanced as being the only solutions to Kington's housing needs. Past and continuing letters to the local press (examples copied in our Appendix), exemplify the local disquiet about this draft Neighbourhood Plan and the lack of proper consultations and consideration.

1.11 We have prepared our response on behalf of Mr Turner and the principal details and objections are set out in the following part of this statement.

2. Other Specific Comments and/or Objections to the draft Consultation Plan

2.1 Re continued consultation and engagement with landowners: We can find little or no evidence of the NPG seeking to work with local landowners in the draft Plan's preparation or indeed any wider community involvement. Mr Turner, as a major and important local landowner, has never been approached by the NPG, never 'engaged' in discussions and never consulted about his HL area for either potential housing or on the acceptance or otherwise for this land to be included in a designation of Local Green Space. Mr Turner has never been included in discussions regarding housing site assessments and we are not convinced that such 'assessments' have been undertaken by the NPG or its advisers to a suitable and appropriate level as to be considered acceptable as evidence for the draft Plan's subsequent policies. The lack of consultation with Mr Turner is contrary to the specific requirements on consultation with landowners and/or developers as set out in the Localism and Neighbourhood Plan legislation or as required in the NPPF and associated guidance and advice. The only time that Mr Turner has ever been involved in any form of discussions was a meeting that he arranged himself in late 2014 with a few of the NPG, which we attended also. Mr Turner felt that it was necessary to bring our early considerations for the HL to the NPG attention so that it could be assessed within the context of a future neighbourhood plan. At that meeting it was considered, generally, that the HL could make a significant contribution towards Kington's housing needs and that an initial phase of around 30 dwellings could be supported.

2.2 Since then we have worked steadily on bringing the HL proposals forward, with extensive professional studies undertaken to cover all the perceived issues on the site. We have consulted with the Kington public, including a comprehensive exhibition; consulted with the LPA; consulted with many other public and outside authorities, including the Environment Agency; informed the KTC and KANPG; and produced a number of alternative strategies for the land. This has resulted in a final draft illustrative scheme as part of an outline planning application for the land for up to 35 dwellings, which was submitted in April 2018; the proposal could pave the way also for a further 15 or so units in later phases. This would still be in line for fulfilling Kington's housing needs, within both the Local Plan (HLPCS) obligations and the NPPF 5-year housing land supply requirements, even if all the 140 KANP allocations were to be acceptable also.

2.3 In addition, our proposals would set aside some 1.8 hectares/4.4 acres or around 64% of the HL, including the important riverside meadows alongside the River Arrow, for dedicated public open space and environmental and landscape enhancements, which

would be a proper and pragmatic solution to opening the land up for Local Green Space. This would align with the draft KANP policies for LSG (LSG1), Green Infrastructure (GI1) and Community Facilities (CF1). Our Illustrative Plan for the site, included in our Appendix, shows these possibilities.

2.4 We would wish it to be noted also, that at the time of publication of this report, the outline planning application for the HL is still waiting determination by the LPA. This is currently nearly 30 weeks since submission and 29 weeks, or over 7 months, since validation. The consultation period was set firstly at 24 May and then 31 May, nearly 6 months previously and the maximum/target determination period of 13 weeks was declared as 21 July 2018, over 4 months ago. Repeated requests to Herefordshire Planning Services for an explanation have remained unanswered and Mr Turner is left with the strong suspicion that his application has been manipulated to await, firstly, the publication of the KANP Regulation 16 draft plan in September 2018 and then, the end of the consultation period in November. If so, this would be highly inappropriate and unprofessional behaviour.

2.5 Despite all of our efforts, as we have found recently with Herefordshire Planning Services, there was no engagement from the NPG whatsoever. **On these grounds we would object in the strongest possible terms to the draft Plan and its legal validity.**

2.6 As we have very strongly indicated already, there is and has been no evidence of landowner 'engagement' or contact or consultation. Mr Turner has not been party to any Housing Site Assessments for the plan although it seems also that neither has the wider Kington public. **Considering that our client's land-holding is probably one of the more significant and readily available for development within Kington and within the draft NP and very mindful that the draft plan is attempting to designate the HL for a supposed LSG use that would blight and could remove future ownership from them, it is immensely disappointing at the very least that the NPG have seemingly failed to engage with Mr Turner in the plan-making process for some three years or more; on this basis we strongly object to the draft Neighbourhood Plan's soundness and its treatment of Mr Turner generally.**

2.7 Re Policy KANP LGS1 – Local Green Space: We would emphasise that only a relatively small part of the whole HL area is put forward for housing development in our outline application. In our own original draft proposals on behalf of Mr Turner, a slightly larger proportion of the land was shown for housing development but much or a majority of it was to be allocated for community, environmental and open space uses, which would be commensurate with any future Local Green Space designation. Our current outline planning application and illustrative proposals, as indicated earlier, seek a smaller level of housing and seek to increase even further the proportion of the site given to community and open space uses – this will be in the region of 64% or more of the site being donated and designated for local community use. **Therefore we consider the NPG assessment of the Headbrook land, defined as GS06 within the draft NP, to be flawed especially as it has not been the subject of any required consultation with the owners, and because of this we would object to the Draft Development Plan (Plan 1 Kington) as shown.**

2.8 We were extremely concerned, also, to find that throughout the previous draft NPs and the consultation processes, policy and reference to the whole of the HL showed it as being classified as “Watermeadows north of Headbrook on south side of River Arrow, GS06”. As we have outlined, this is in fact an overall area of 3.8 hectares/9.5 acres of privately owned and strongly fenced agricultural land and has remained so for many, many years. The land is not ‘watermeadows’; it is agricultural land. The current EA maps indicate that a small portion of the immediate riverside land is within a designated Flood Zone 3 area and a further small proportion is within a Flood Zone 2 area. Our Flood Risk Report for the outline planning application clearly demonstrates that around 1.2 hectares/3.0 acres is within Flood Zone 1 and beyond the EA’s 1000 year flood line, which in other words is wholly outside of any floodplain – it certainly is not ‘watermeadows’. A further 0.2 hectares/0.6 acres is proven to be between the 1000 year flood-line and the EA’s defined 100 year flood-line + Climate Change Allowance + 70% Contingency Allowance area and would, therefore, be guaranteed to be flood free and potentially developable. West of the outline application site and the prominent north-south field boundary is a further 0.6 hectares/1.5 acres of land within the Zone 1 flood free area, which could represent additional development land in the future, subject to nearby Conservation Area considerations. Although, presumably as the result of our previous objections to the earlier draft NP, we find that the ‘water meadows’ references have now been dropped for the current draft NP, we consider that the constant past references to the perceived but unproven ‘flooding’ on the HL has led to the support in some quarters of the community for the land to be designated as Local Green Space. **On this basis alone we would object to the Local Green Space defined in the draft Plan as Policy KANP LGS 1 – Local Green Spaces and as (v) Land at Headbrook to south of River Arrow GS06 on Plan 1 (Kington), especially as it has been formed in the past from misleading previous evidence.**

2.9 Notwithstanding the foregoing, as far as Mr Turner is concerned the statements in these draft policies are wrong and without foundation. The draft Plan offers no evidence as to how or why all of the HL should be identified as meriting use for LSG and amenity use or what such amenity use should or could be. The land certainly has not gained any informal recreational use as it has remained in private ownership for agricultural purposes for over a century and any other access on to it by the public or any individuals is clearly a trespass on Mr Turner’s property. The land has not been established for any other use than agriculture. On this factor alone any consideration for LGS designation must fail. Government guidance on this makes it clear in the NPPF and elsewhere that any proposed LGS designation will not be appropriate for most green areas or open space and that such a designation should only be used where *inter alia* :

- *the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- *where the green area concerned is local in character and is not an extensive tract of land.*

2.10 There is clearly no appropriate evidence offered as to why the HL is demonstrably special to the local community over and above any other local tract of land or why such an extensive tract of land is being proposed. In view of the fact that within easy reach of the whole Plan Area community are many existing and excellent publicly accessed areas of recreation and amenity land – Mill Street Recreation Ground, Lady Hawkins School site

and Bradnor Hill are three immediate examples. **Without other specific evidence, it would seem to us that the LGS proposal may be merely a whim of a specific minority of local residents to use inappropriate designations which would result in the blight of privately owned land and prevent the possibilities of sustainable future development.**

2.11 Government guidance makes it very plain that, amongst other things, LSG designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of ‘Green Belt’ by another name or to attempt to block potential new housing land. Furthermore, guidance states that a ‘qualifying body’ should contact landowners at any early stage about proposals to designate any part of their land as LGS. This, like many other examples within this draft Plan, has patently not happened. If the NPG persist in pursuing this particular designation and policy it is more than likely that our clients would seek appropriate redress. **On these grounds, Mr Turner objects in the strongest terms possible to the proposed LGS designation and draft Policy KANP LGS1 and specifically to its reference to GS06 and objects also to the misleading information and manner in which this proposal has been formulated. On behalf of our clients we request that this policy is removed in its entirety from the draft Consultation Plan and any subsequent versions of the Neighbourhood Plan.**

2.12 We have already stated quite clearly that the current outline planning application for the HL will include a significant area of around 1.8 hectares/4.4 acres of new public access space which can be designated immediately for public open space and LSG purposes, including new public footpaths, which will enable a practical and pragmatic opportunity for significant new open space for Kington and the wider community, including the riverside access. There are remaining parts of the HL also that could be given additionally by Mr Turner in any appropriate future development.

2.13 Re the draft Proposals Map: Plan 1 - Kington Town Settlement Boundary, Housing Development Sites and Green Space: Our reasons as outlined above confirm also that **we object to the draft proposals map and specifically the designation of LGS GS06 on Mr Turner’s land at Headbrook; the designation of housing sites within the Settlement Boundary and in particular sites K6 and K7; and the non-inclusion of the appropriate parts of the Headbrook Land (or GS06 as represented) as potential housing sites within the Settlement Boundary.**

2.14 With regard to the draft site allocations K6 and K7 in particular, we would point out that these site should be deleted, particularly, on the following grounds:

- Significant harm to both the immediate local and wider landscape and environment.
- Significant harm to the setting of Kington and its immediate and wider attributes.
- Significant harm to the setting of the Kington Conservation Area and to nearby Listed Buildings, especially in relation to the prominence of the land.
- The land proposed is in open countryside beyond the existing visible and defined limits of Kington and would represent an unwarranted extension of the town into the countryside.
- The land proposed is on the edge and beyond the existing town and would be a significant distance from the town’s central services and facilities, especially the central shopping area; as a result this would encourage considerably increased

vehicle uses on the local roads and exacerbate congestion within the town centre and this makes the proposed development unsustainable.

- The land forming sites K6 and K7 have been assessed several times since 2007 within the Council's Strategic Housing Land Availability Assessment (SHLAA) studies and reports; the conclusion on every occasion has been:

For Site K6:

Summary Description:

Grassland. Site slopes steeply to the south. Views into site: Prominent elevated land. Views out of site: Views to the north. Adjacent/surrounding land: Agricultural land. Site integration: No, the site is not well related to existing built form, elevated, sloping site. Height and character: 2 storey houses in vicinity.

Is the site suitable (and achievable) for development?:

No. Development would have significant landscape impact, sloping site, access would also be difficult due to bend in lane

For Site K7:

Summary Description:

Arable land. Sites rises to the south. Views into site: Prominent, elevated land. Views out of site: Extensive views to the north. Adjacent/surrounding land: Agricultural land. Public right of way: Yes, adjacent to western side. Site integration: No, adjacent a ribbon of developed houses but otherwise divorced from built up area. Height and character: 2 storey residential development.

Is the site suitable (and achievable) for development?:

No, elevated land. Significant landscape impact. Well beyond built up area of town

Clearly, Sites K6 and K7 have been regarded, consistently, as being wholly unsuited for any new housing development whatsoever.

- Lack of any information as to the likely infrastructure requirements for the land and, given the elevated and steeply sloping nature of the local topography in particular, how the potential difficulties of foul and surface water drainage, water run-offs to neighbouring lands and water supply are to be satisfied.
- Lack of suitable highways access, with Kingswood Road being totally unsuited through reasons of width, steep gradients, bends with impaired forward visibility, harm to the existing landscape and environment and an unsuitable and potentially dangerous junction with Headbrook and Bridge Street.
- Lack of suitable highways access in the form of the proposed main access roadway from the K6 and K7 sites, which requires taking all traffic through the established Local Green Space and Children's Play Areas associated with the Kington Park housing development which, as we understand it, is covenanted to remain in perpetuity for open space purposes only and for no other uses whatsoever.
- The likely fact that the proposed K6/K7 access road would not fulfil the County's established highway standards and requirements, particularly with regard to forward and sight-line visibility at its junction with Eardisley Road; the closeness to other existing road junctions both on Eardisley Road and with the junction of Eardisley Road and Headbrook; and the likely compromised sight lines for traffic at the Eardisley Road/Headbrook junction, especially in the western direction and across the ownerships of the Lomas garage and petrol station and other local commercial ownerships.

2.15 With regard to the road access matters, which we know are the likely subject of

serious representations from other local Kington community residents also, we would point out that in 2009, the LPA refused planning permission to a local businessman for an application for the change of use of this very same stretch of open space land for car parking and an access drive (Application Reference DMNW/092216/F). The refusal reasons were:

1. *The application represents a proposal for development on land allocated as open space in relationship to housing development in accordance with the Herefordshire Unitary Development Plan and as such the proposal is considered contrary to Policies S8 and HBA9 of the Herefordshire Unitary Development Plan.*
2. *It is considered that the proposed development will have a detrimental impact on the amenity of the adjacent dwelling to the application site and as such the proposed development is considered contrary to Policy DR2 of the Herefordshire Unitary Development Plan.*
3. *The proposal fails to demonstrate that appropriate visibility splays can be provided in order to maintain satisfactory highway safety standards. Therefore the proposal is considered contrary to Policies S6 and DR3 of the Herefordshire Unitary Development plan.*

2.16 Although the Unitary Development Plan is now replaced by the Herefordshire Local Plan Core Strategy, nevertheless the fundamental reasons for refusal still remain for this land and it should not be underestimated that the refused proposal was for a road serving a dozen car-parking spaces for the business customers and not for a main, single, access road serving over 100 dwellings.

3. Summary and Conclusions

3.1 Mr Turner is greatly concerned at the content of the draft Kington Area Neighbourhood Plan and the manner in which to date it has been prepared and presented. His significant land ownership and his views and engagement within the KANP processes appear to have been largely ignored or dismissed by the Neighbourhood Plan Group. Our client's land is significantly affected and potentially would be blighted by the draft proposals and this has been done so without any appropriate level of evidence being shown as to why this should be the case. There have been no advanced notifications, consultations or discussions prior to this Consultation Draft or any other previous versions, which is wholly contrary to Neighbourhood Plan legislation. There is ill-informed, misleading and wrong information quoted within the draft Plan statement and matters of fact that have been misrepresented seriously. The government makes it clear in terms of the legislation covering Neighbourhood Plans, together with accompanying advice and guidance, that Neighbourhood Plans should set out the vision for an area and the planning policies for the use and development of land. It emphasises that plans should be focused on guiding development rather than stopping it. It seems to us that the Kington Area Neighbourhood Plan Group and a small minority of people are more interested in using the NP process to curtail suitable development and champion inappropriate development and, specifically, to prevent development of our client's land at Headbrook for ever and to effectively 'steal' it from their control, blighting it for future use. This is not what Neighbourhood Planning should be about. **In our opinion this is a Plan flawed in both content and presentation and should be rejected and not allowed to continue in its present form.**

3.2 On these grounds alone, Mr Turner objects to the draft Kington Area Neighbourhood Plan as a whole and in particular to several specific draft policies and

proposals contained within it. Specifically identified policies objected to are:

KANP SB1 Settlement Boundaries: Kington Town.

KANP H1 Housing Delivery: Kington Town and the specifically allocated sites K6 and K7.

(Mr Turner also has misgivings that many of the other sites put forward are not 'deliverable' either in the plan period or with regard to the NPPF's required 5 year readily available housing supply within the County; this applies particularly to sites K4 and K5).

KANP H2, Housing Delivery: Land South of Kington

KANP LGS1, Local Green Spaces

And specifically, designation Plan 1 (Kington) (v) Land at Headbrook south of the River Arrow, GS06.

PLAN 1 - Kington Neighbourhood Development Plan: Kington Town Settlement Boundary, Housing Development Sites and Green Space

And specifically:

- **The Kington Town Settlement Boundary and its exclusion of the Headbrook land;**
- **The designation of GS06 - Land Beside River;**
- **Housing sites K6 and K7;**
- **Housing sites K4 and K5.**

END

P J Draper DipTP (Nottm), FPCS

PDA Planning

On behalf of Mr Martin Turner

November 2018

Addendum:

Our client has also added separate representations to complement our representations on and objections to the KANP draft, which sets out in some detail his considerations and feelings with regard to the KANP draft. This has been sent separately to this statement.

Appendix:

1. Copy of two relevant letters from local Kington residents included in the Hereford Times (29 June 2017), setting out the disquiet about the draft KNAP (note, names redacted).
2. Copy of our illustrative layout plan for the Headbrook Land accompanying the current outline planning application for the site.

Appendix 1 – Letters from local residents



Appendix 2 – Indicative layout plan for current outline planning application on the Headbrook land site



© PDA Planning, November 2018



KINGTON PARK RESIDENTS ASSOCIATION

13th November 2018

Kington, Kington Rural and Lower Harpton Group and Huntington Neighbourhood Development Plan

This letter is written on behalf of the Kington Park Residents Association (KPRAs) laying out our concerns in relation to part of this neighbourhood development plan. Our concerns focus upon the proposed road access route onto the Old Eardisley Road for the development areas described as K6 and K7 (formerly K12 and K13).

At the various public meetings held in Kington we have made it clear that whilst we believed the proposed 100 house development is out of scale, is lacking sufficient local infrastructure to support it, and is not a benefit to the town at present, we have not opposed the principle of the development.

However, we remain strongly opposed to the proposed road access route, which is shown to go through the open space and play area between Kington Park and the properties that face onto Headbrook. Our reasons are:

Loss of Public Open Space and Play Area

1. This green space and children's play area was part of the Herefordshire CC planning gain for the Kington Park development. It would be morally wrong to plunder this planning gain.
2. It is the only public open green space on the east side of the River Arrow in Kington and is in daily use by residents from Headbrook, Banley Drive, Black Barn Close, Old Eardisley Road and the Kington Park development. Currently, for over a 110 houses this is their local green space.
3. Under Visual Impact Assessment and Land Strategy Report submitted by the Kington Park developer (Bloors Ltd) paragraph 7.6 stated "Provision of Public Open space for the local community.... This will be a multifunctional area including access for walking, informal recreation and improved biodiversity." And at 7.7 "Provision of a children's play area To benefit the residents of the Headbrook area."

Safety Issues

4. The distance from Headbrook Rd junction with Old Eardisley Rd to the proposed new access road is less than 30 metres. The Old Eardisley Road is already busy with about 100 houses feeding onto it. In addition, there is Kingdom Hall at the end of the road and Masonic Hall on the junction with Headbrook. These two halls bring regular additional traffic and in the case of Masonic Hall cars are parked all the way up Old Eardisley Road (see photograph 1 below). The petrol garage on Headbrook is also close to the Old Eardisley junction and traffic entering the petrol station again often backs up towards this junction (see photograph 2 below).
5. For the houses that feed onto the Old Eardisley Rd this is the only pedestrian route into Kington. The creation of a new road onto it with the additional traffic (up to 200 cars) will be a major safety issue to children.
6. We understand that the County Council has already refused the creation of a road from the rear of Ian Jones Tyres and onto the Old Eardisley Road (Application number DMNW/092216/F). Reasons include "proposal for development on land allocated as open space in accordance with the Herefordshire Unitary Development Plan"; "will have a detrimental impact on the amenity of the adjacent dwelling" and "fails to demonstrate... satisfactory highway safety standards".

Public Consultation within Kington

7. At public meetings 14th July 2016 and again on 27th July 2017 no-one supported the proposed access to the K6/K7 development through the play area/open space. In fact, it was strongly opposed and the Town Council were urged to find an alternative route.
8. This strong opposition by the people of Kington has been completely ignored
9. Policy justification for proposed access for K6/K7 developments is limited to: *9.4.30 There will be no vehicular access on Kingswood Road; but a new access point will be taken from Old Eardisley Road, to the east of the site. However, in order to deliver this new access, it might be necessary to upgrade the junction of Headbrook and Old Eardisley Roads.* The main KNDP gives no justification for this route; has failed to recognise the safety issues associated with it and has made no reference to and ignored local unease and opposition.
10. Equally, although other possible access routes for these new developments were put forward at the public meetings the absence of any reference to them in the KNDP makes it clear that none were given serious consideration or explored.

We thank you for the opportunity to comment on the KNDP, but wish to express our concern of the very limited publicity given to this consultation. I expect most people in Kington remain blissfully unaware of it.

Yours faithfully

Paul Finch

Chair of Kington Park Residents Association

PHOTOGRAPH 1.



PHOTOGRAPH 2.



Latham, James

From: P KIRBY
Sent: 13 November 2018 10:35
To: Neighbourhood Planning Team
Subject: Kington Area Neighbourhood Plan

Dear Sirs

I am writing in response to the current Article 16 consultation in relation to the Kington Area Neighbourhood Plan.

I own the parcel that the Plan refers to as K6 and to which policies KANP1 and 2 in particular refer. I confirm that it is my intention to bring the land that I own forward for development during the plan period.

Should you have any queries or require any further information then please do not hesitate to contact me.

Yours faithfully

Peter Kirby

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 10 October 2018 09:31
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	3 Oakwood Drive, Loughborough
Postcode	LE11 3QF
First name	ENGLAND
Last name	SPORT
Which plan are you commenting on?	Kington
Comment type	Comment
Your comments	<p>Thank you for consulting Sport England on the above neighbourhood plan. 1) The tennis courts at Halo Lady Hawkins School have been excluded from the green space shown on plan 1 with the grass playing fields included. The tennis courts are functionally and locationally part of the playing field and should therefore form part of the green space that is to be protected by the policy in the plan, as Sport England would consider this to be part of the whole playing field area at this site and would apply our policy accordingly. 2) The bowls green at Park Green has been omitted, it would be appropriate to include this within the green space annotated on plan 1.</p> <p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important. It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Playing Fields Policy and Guidance</p>

document.

<http://www.sportengland.org/playingfieldspolicy> Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/> Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance> If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. <http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/> Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting

from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place. In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities.

Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals. Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved. NPPF Section 8:
<https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities> PPG Health and wellbeing section:
<https://www.gov.uk/guidance/health-and-wellbeing>
Sport England's Active Design Guidance:
<https://www.sportengland.org/activedesign> (Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment

From Herefordshire Council Strategic Planning Team

 Name of NDP: **KINGTON AREA NEIGHBOURHOOD PLAN (Regulation 16 consultation)**

Date: 13/11/18

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
Policy KANP ENV1 A Valued Natural Environment	LD1,LD2 & LD3, LD4	Y	
Policy KANP ENV 2 – Dark Skies	LD1, SD1	Y	
Policy KANP ENV3 A Valued Built Environment	LD1, LD4, SD1	Y	
Policy KANP SB1 Settlement Boundaries	KG1, RA2, RA3, RA4 & RA5	Y	
Policy KANP H1 Housing Delivery: Kington Town	SS2, KG1	Y	<p>K2- It would be useful if the tree officer could provide comments with regard to the tree within the site as it may affect capacity.</p> <p>K3- the site has planning permission (P153631/F) for 10 dwellings. An application (P174424/XA2) for Approval of details reserved by condition was granted in January 2018 but development has yet to commence.</p> <p>Please see update to Table 1 below.</p> <p>Better justification to the nominated windfall amount is needed. Please see below.</p>
Policy KANP H2 Land	SS2, KG1,	Y	

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
South of Kington	SD3		
Policy KANP H3 Housing Delivery: Kington Rural and Lower Harpton Group Parish	RA2	Y	<p>Have Environmental Health been consulted on this proposal due to the proximity to the turkey farm sheds?</p> <p>The rural part of the NDP area has only seen 2 windfall completions in the past 7 years. Therefore further justification for the windfall figure of 13 is needed. For instance the introduction of a settlement boundary which was previously open countryside up until this point provides opportunity for development which did not exist before. A commitment of 5 dwellings might also help to demonstrate that construction activity is on the increase more so than earlier years of the economic downturn.</p>
Policy KANP H4 Housing Delivery: Huntington Parish	RA3, RA4 & RA5	Y	
Policy KANP H5 Housing Design Criteria	SD1	Y	Need to reference in the Policy justification why the London Space Standards are referred to in the policy as there are other standards available.
Policy KANP E1: A Thriving Rural Economy	SS5, E1, E2 & E3	Y	
Policy KANP E2 - Large Scale Employment Activities	SS5, E1, E2 & E3	Y	

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
Policy KANP KTC 1: Kington Town Centre	E5, E6	Y	Could not locate Map 1 as referred to in the policy VIII – remove unnecessary text (Lsep)
Policy KANP T1: Sustainable Tourism	E4	Y	
Policy KANP INF 1: Local Infrastructure	SD1, SD2 & SD4	Y	
Policy KANP ENV4 - Flood risk and drainage	SD3	Y	
Policy KANP LGS 1: Local Green Spaces	OS1,	Y	
Policy KANP GI 1: Green Infrastructure	LD3	Y	
Policy KANP CF1: Community Facilities	SC1	Y	

Other comments/conformity issues:

Please provide a contents page for the appendices

Update references to the 2018 NPPF

Table 1

Core Strategy Target 2011-2031 “around 200 dwellings” Completions at April 2018	<u>4416</u>
Planning permissions at April 2018 <u>26 32 (this includes the allocation K3 for 10 dwellings which has planning permission)</u>	
Site allocations	<u>440131</u>
Windfalls	26
Total by 2031	<u>206205</u>

Kington town windfall

Year	Net completion windfalls
2011/12	5
2012/13	0
2013/14	5
2014/15	3
2015/16	1
2016/17	0
2017/18	<u>2</u>
Total	16

The above pattern shows that there were on average 2 windfalls per annum. With thirteen years remaining it would be reasonable to expect to see 26 dwellings coming forward as windfalls.

End

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 12 October 2018 14:24
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Tony
Last name	Bennett
Which plan are you commenting on?	Kington
Your comments	surely the plans can not work as the existing sewer system is over worked the schools are full there isnt enough jobs