

Stretton Grandison Group Neighbourhood Development Plan
Steering Group and Parish Council Responses to Reg 16 Comments
June 2020

NDP Policy / Section	Reg 16 Comments	Steering Group / Parish Council Response
Herefordshire Council Technical Officer (Air, Land & Water Protection) Economy and Place Directorate		
General	<p>RE: Stretton Grandison Group Regulation 16 submission Neighbourhood Development Plan</p> <p>Dear Neighbourhood Planning Team,</p> <p>I refer to the above and would make the following comments with regard to the above proposed development plan.</p> <p>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.</p> <p>Having reviewed records readily available, I would advise the following regarding the four proposed housing site allocations identified for new housing development (<i>Policy SG2</i>) as indicated in brown on the Canon Frome and Stretton Grandison Village Polices Map.</p> <p>It appears a site allocation plan has not been provided for Policy SG3 Affordable Housing, however I have provided comments below.</p>	<p>Noted.</p> <p>No change proposed.</p>

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Policy SG2 Site 2	<p>Policy SG2 Housing Sites:</p> <p><u>Canon Frome Village Polices Map</u></p> <p>Site 2: Land at Vicarage Cottage, Canon Frome</p> <ul style="list-style-type: none"> • A review of Ordnance survey historical plans indicate the site has historically been used as an orchard. By way of general advice I would mention that orchards can be subject to agricultural spraying practices which may, in some circumstances, lead to a legacy of contamination and any development should consider this. 	<p>Noted.</p> <p>See below. This is a development management matter and would be considered as and when a planning application is submitted.</p> <p>No change proposed.</p>
Policy SG2 Site 3	<p>Site 3: Land at The Barn, Canon Frome</p> <ul style="list-style-type: none"> • A review of Ordnance survey historical plans indicate a site used for: Machinery, engines, building and general industrial (manufacture) was situated immediately adjacent to the west of the allocated 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. • A review of Ordnance survey historical plans indicate the site has historically been used as an orchard. By way of general advice I would mention that orchards can be subject to agricultural spraying practices which may, in 	<p>Noted.</p> <p>See below. This is a development management matter and would be considered as and when a planning application is submitted.</p> <p>No change proposed.</p>

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	some circumstances, lead to a legacy of contamination and any development should consider this	
Policy SG2 Site 1	<p><u>Stretton Grandison Village Polices Map</u></p> <p>Site 1: Land at Townsend Barns, Stretton Grandison</p> <ul style="list-style-type: none"> • A review of Ordnance survey historical plans indicate the site is located on area of ground which has been identified as unknown filled ground (pond, marsh, river, stream, dock etc.) <p>Sites identified as unknown filled ground can be associated with contaminative fill material. In practice, many sites identified through the historical mapping process as unknown filled ground are instances where hollows have been made level with natural material, have remained as unfilled 'hollows' or have filled through natural processes. However, there are some instances where the nature of the fill is not inert and would require further investigation. Without any additional information it is not possible to comment further on this site. Any additional information you may be able to obtain will help in determining the exact nature of the site. The site's historic potentially contaminative use will require consideration prior to any development.</p> <p>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</p>	<p>Noted.</p> <p>This is a development management matter and would be considered as and when a planning application is submitted.</p> <p>No change proposed.</p>

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	<p>'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:</p> <p>1. No development shall take place until the following has been submitted to and approved in writing by the local planning authority:</p> <p>(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</p> <p>(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</p> <p>(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.</p>	

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	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	

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Policy SG2 Site 4	<p>Site 4: Land east of A417 (north), Stretton Grandison (Former Orchard area adjacent School Cottages, Stretton Grandison)</p> <ul style="list-style-type: none"> A review of Ordnance survey historical plans indicate the site has historically been used as an orchard. By way of general advice I would mention that orchards can be subject to agricultural spraying practices which may, in some circumstances, lead to a legacy of contamination and any development should consider this 	<p>Noted.</p> <p>This is a development management matter and would be considered as and when a planning application is submitted.</p> <p>No change proposed.</p>
Policy SG3	<p>Policy SG3 Affordable Housing at Canon Frome Court</p> <p>Site 8 Canon Frome Court, Canon Frome -Affordable Housing</p> <ul style="list-style-type: none"> It appears that a plan of site 8 has not been provided in this NDP. <p>A review of Ordnance survey historical plans in '<i>Stretton Grandison Group Regulation 14 draft Neighbourhood Development Plan</i>' indicated the '<i>Policy SG3 Affordable Housing at Canon Frome Court site</i>' appeared to have had no previous historic potentially contaminative uses.</p>	<p>Noted.</p> <p>There is no site plan for this policy. Canon Frome Court lies outside the identified settlement boundary for Canon Frome as shown on Map 4 and is therefore in the rural area / countryside.</p> <p>The policy supports affordable housing in line with Core Strategy Policies RA3 and H2 which support proposals for rural exception sites.</p> <p>No change proposed.</p>
General	<p><u>General comments:</u></p> <p>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</p>	<p>Noted.</p> <p>No change proposed.</p>

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	<p>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.</p> <p>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.</p> <p>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.</p> <p>These comments are provided on the basis that any other developments would be subject to application through the normal planning process.</p>	
The Coal Authority		
All / General	<p><u>Stretton Grandison Group - Regulation 16</u></p> <p>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.</p>	<p>Noted.</p> <p>No change proposed.</p>

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	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.	
Dŵr Cymru Welsh Water		
All / General	<p>I refer to the below consultation and would like to thank you for consulting Welsh Water. As you may be aware, we were consulted as part of the Reg 14 consultation and are pleased to note that the Parish Council has taken on board our comments.</p> <p>As such we have no further comment to make.</p>	<p>Noted.</p> <p>No change proposed.</p>
Historic England		
All / General	<p>STRETTON GRANDISON GROUP NEIGHBOURHOOD PLAN – REGULATION 16 CONSULTATION.</p> <p>Thank you for the invitation to comment on the Submission Draft Neighbourhood Plan.</p> <p>In general our earlier Regulation 14 comments remain entirely relevant. That is:</p> <p>“Historic England has no adverse comments to make upon the draft plan which we feel takes a suitably proportionate approach to the main historic environment issues pertaining to Stretton Grandison.</p> <p>We are pleased to note that the Plan evidence base is generally well informed by reference to the Herefordshire Historic</p>	<p>Noted.</p> <p>No change proposed.</p>

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	<p>Environment Record including the Herefordshire Landscape Character Assessment. We are generally supportive of both the content of the document and the vision and objectives set out in it. We commend the commitment to support development that is sensitive and sympathetic to the character of the area including its rural landscape character and green spaces”.</p> <p>Beyond those observations we have no further substantive comments to make.</p> <p>I hope this advice is helpful.</p>	
Jean Wood		
Various minor editing details	<p>With many apologies for the lateness of these comments, I just thought I would make the following points:-</p> <p>para 2.11 page 7 - Should be Fillings Bridge NOT Stiffords Bridge.</p> <p>para 4.11 page 19 - Should be Herefordshire NOT Hertfordshire</p> <p>para 4.19 page 21 - The Willows Canon Pyon should be Canon Frome.</p> <p>para 4.29 page 24 - There is NO public sewerage in Stretton Grandison.</p>	<p>Minor editorial changes to 2.11 and 4.11 accepted.</p> <p>4.19 Canon Pyon was the address given on the site submission form completed by the owner. No change.</p> <p>Refer to Consultation Statement Table 2 Consultation Bodies' and Other Groups' Consultation Responses page 90. This information was provided by Dwr</p>

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	<p>para 5.29 page 46 - I have lived in Stretton Grandison for most of my life and have never heard of Bishops Cottages. Could you describe to me where they are please as it would be interesting to know?</p> <p>Thank you for your time in reading this note. I do hope you are staying safe in these very challenging times.</p>	<p>Cymru/Welsh Water at Reg 14 consultation stage. See above - the consultation body is supportive of the changes made to the NDP prior to submission so presumably the information is correct.</p> <p>No change.</p> <p>It is possible that this is an error from the document referred to in 5.28 as it is not included in Appendix 4 Listed Buildings. It could be 'BRINSOP COTTAGE'.</p> <p>Suggest this is referred to HC.</p>
Avison Young on behalf of National Grid		
All / General	<p>About National Grid National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p>	<p>Noted.</p> <p>No change proposed.</p>

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	<p>National Grid Ventures (NGV) is separate from National Grid’s core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p>	
	<p>Proposed development sites crossed or in close proximity to National Grid assets:</p> <p>An assessment has been carried out with respect to National Grid’s electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.</p> <p>National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.</p> <p>National Grid provides information in relation to its assets at the website below.</p> <ul style="list-style-type: none"> • www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/ <p>Please also see attached information outlining guidance on development close to National Grid infrastructure.</p>	
All / General	<p>Distribution Networks</p> <p>Information regarding the electricity distribution network is available at the website below: www.energynetworks.org.uk</p> <p>Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com</p>	<p>Noted.</p> <p>No change proposed.</p>

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	<p>Further Advice Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if they are not already included:</p> <p>Distribution Networks Information regarding the electricity distribution network is available at the website below: www.energynetworks.org.uk Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com</p> <p>Further Advice Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if they are not already included: X</p> <p>If you require any further information in respect of this letter, then please contact us. Yours faithfully,</p>	
All / General	<p>Guidance on development near National Grid assets National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.</p>	<p>Noted.</p> <p>No change proposed.</p>

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	<p><u>Electricity assets</u> Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.</p> <p>National Grid's <i>'Guidelines for Development near pylons and high voltage overhead power lines'</i> promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgridet.com/document/130626/download</p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.</p> <p>National Grid's statutory safety clearances are detailed in their <i>'Guidelines when working near National Grid Electricity Transmission assets'</i>, which can be downloaded here:www.nationalgridet.com/network-and-assets/working-near-our-assets</p>	

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	<p><u>Gas assets</u> High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.</p> <p>National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.</p> <p>National Grid's '<i>Guidelines when working near National Grid Gas assets</i>' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets</p> <p><u>How to contact National Grid</u> If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:</p> <ul style="list-style-type: none"> • National Grid's Plant Protection team: plantprotection@nationalgrid.com <p>Cadent Plant Protection Team Block 1 Brick Kiln Street Hinckley LE10 0NA 0800 688 588 or visit the website: https://www.beforeyoudig.cadentgas.com/login.aspx</p>	
Natural Resources Wales		

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All / General	NRW has no comment to make with regards to the Stretton Grandison Neighbourhood Development Plan. If you haven't already done so, we would advise you consult Natural England.	Noted. No change proposed.
NFU		
All / General.	<p>Stretton Grandison Neighbourhood Development Plan Consultation – NFU Response</p> <p>The West Midlands NFU welcomes the opportunity to comment on the Stretton Grandison Neighbourhood Development Plan. The West Midlands NFU represents approximately 5400 Farmers and Growers across the West Midlands region and over 50,000 farmers and growers nationally. In Herefordshire we represent over 1000 farmers and landowners. Our response is given below along with some key priorities.</p> <p>The NFU recognises that neighbourhood plans can help shape, direct and deliver sustainable development and deliver a communities vision for a parish (paragraph 29 of the National Planning Policy Framework 2019), but also have to demonstrate how the plan will contribute to improvements in environmental, economic and social conditions or that consideration has been given to how any potential adverse effects arising from the proposals may be prevented, reduced or offset (referred to as mitigation measures) (paragraph: 072 Reference ID: 41-072-20190509 of Planning Practice Guidance).</p> <p>The NFU would emphasise the importance considering the potential impact neighbourhood plans could have on rural economies, climate change, food security, providing affordable</p>	Noted. No change proposed.

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	<p>homes and getting essential rural infrastructure in place. We also have real challenges for our elderly rural population to ensure they get the services they need, including broadband, appropriate housing and dealing with isolation. At a time when we have an Agriculture Bill and Environment Bill coming forward, as well as changing trading conditions it is essential that neighbourhood plans can support their farming and rural communities to move to a more sustainable future.</p> <p>As you will be aware the farming community continues to face formidable challenges with increasing regulation, volatile markets and fluctuating farming returns. In response to these challenges farmers have had to consider the resources available to them and look at new ways of developing their businesses so that they can grow and remain competitive. This might include the need for modern agricultural buildings either to meet regulations or to change the use of existing buildings in order to respond to changing market demand.</p> <p>Our members in Stretton Grandison are no exception and given that the area is largely rural it is clear that any form of Neighbourhood Plan must adequately the issues and opportunities of farming.</p> <p>We have identified the following key priorities for agriculture (not in order of priority):</p> <ol style="list-style-type: none"> 1. The ability for the next generation to take on management of farms and to support this through the provision of affordable housing to allow succession. 	

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	<p>2. Develop farming enterprises that can meet the challenges of food security through modernising and becoming more efficient</p> <p>3. Diversifying farming enterprises to meet new opportunities such as, <i>inter alia</i>, business units or tourism.</p> <p>4. Developing renewable energy which meets the needs of the farm and are appropriate to the location and renewable resources available.</p> <p>5. Access to high speed broadband and mobile phone coverage.</p> <p>You may be aware that the farming industry is committed to be carbon neutral by 2040, which will mean land use change, more renewables and more efficient buildings, including glasshouse and polytunnels. The Government targets for 2050 and legislation now coming into force will affect how we live our lives, heat our homes and drive vehicles. We would ask you to ensure that the neighbourhood plan promotes carbon neutrality and climate change provision. A simple way to cut a carbon footprint is access to local, sustainable food; but the neighbourhood plans can also help, by encouraging sustainable and inclusive housing design at a cost rural workers can afford, and that residents have access to vehicle charging stations and renewable energy supplies.</p> <p>Food security is becoming more important, and access to sustainable, local food impacts on every carbon footprint. Currently only circa 8% of the fruit we eat and 53% of the vegetables are produced in the UK. Climate change, particularly access to water supplies, is affecting key countries who import to the UK, whilst areas such as Herefordshire and</p>	

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	<p>Worcestershire continue to have more plentiful water and high quality soils and are much needed to produce more food for us. The need to ensure local produce is available to all has never been higher.</p> <p>Herefordshire's economy is underpinned by farming, with many landscapes maintained by family businesses. The Agriculture Bill will require them to be producing more food on less land, with new buildings and operations. Only if this happens can they then increase ecological and biological diversity of other land and landscapes and allow this to adapt to climate change. Only by allowing farming to become more productive can there be the ability to allow the landscape to produce more public goods for the benefit of the wider community and visitors. The neighbourhood plan has therefore to recognise and ensure it can happen with the minimum regulatory burden and support.</p> <p>We have the following specific comments on the plan:</p>	
Policy SG9	<p><u>6.0 Local Economy</u></p> <p>Policy SG9 Re-use of former agricultural buildings for local economic development</p> <p>We welcome the support for the re-use of agricultural buildings which can provide additional economic opportunities in rural areas.</p>	<p>Noted.</p> <p>No change proposed.</p>
Policy SG10	<p>Policy SG10 New agricultural buildings and polytunnels</p> <p>Any policy on new agricultural development should be workable and support farming, within the context of environmental and landscape benefit, including climate change adaptation. Local farm businesses should be supported as producers of</p>	<p>Comments noted.</p> <p>The Group Parish is very rural in character and the attractive landscape is highly valued by residents and visitors. It is accepted</p>

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	<p>sustainable local food and key delivery mechanism for landscape and biodiversity assets.</p> <p>Farmsteads and rural locations are surrounded on all sides by open fields and woodland. Therefore it may not be practical to avoid all landscape impacts. As a general principle, buildings should be well designed according to the specific conditions of each site, in so far as technical requirements permit. Farmers are increasingly required to look at site layout, building design and materials to minimise fuel costs and reduce carbon emissions at source.</p> <p>Often farmers need to replace traditional farm buildings because they are no longer suitable for modern livestock rearing and crop production. For example, they may no longer meet animal welfare or food hygiene standards. The scale of the building is often important to give livestock sufficient space and ventilation and to accommodate modern agricultural machinery and other infrastructure. Operations need to be of sufficient scale to make them economically viable. Therefore we are concerned by the policy that suggests that ridge height could be broken up as this is not practical in a modern agricultural building. We are also concerned by the references to changes in materials and colour as again this may not be practical and would add considerable costs and complexity.</p>	<p>that the local economy is highly dependant on agriculture and food production but there is a need to ensure that new agricultural buildings are sensitive in design, just as residential buildings are required to be. Public consultations have shown that local people have commented about modern agricultural practices including polytunnels and largescale intensive animal production - both supporting and objecting to them.</p> <p>Excessive use of poly tunnels and additional farm building development on land which is a visual asset to the area can cause problems. Any additional 'covering' to the bare land should be minimised to reduce the risk of flooding to both the local parish and communities further downstream. We do need policies in place to ensure that any rural development for is not at the detriment to the residents and the local environment.</p>

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	<p>Farming is a 24 hour a day 7 day per week occupation and it will be necessary for farms to operate during unsociable hours. This is because crops will need establishing and harvesting and animal welfare is a 24 hour a day requirement. The reference to unsociable hours should be removed as it is not practical to operate a farm business with such constraint. It is not clear what the reference to the storage of hazardous materials means. This reference is potentially a duplication of existing legislation and has the potential to add to the complexity of planning as it will be difficult to interpret.</p> <p>Soft fruit production within Herefordshire is recognised as a major industry, rural employer and producer of food. It is clear that the economic benefit of soft fruit production spreads much wider than to the farm alone. Primary soft fruit production will support a whole supply chain and therefore many jobs.</p> <p>The soft fruit farms of Herefordshire would not be viable without the use of polytunnels as in many instances it is quite simply uneconomic to grow soft fruit in the open in the UK climate. Many of the farms involved cover small acreages and would find it difficult to survive without soft fruit production. Herefordshire growers have invested enormous capital and resources in the polytunnels, equipment and associated infrastructure including pack houses etc. Their contribution to the local rural economy must be given full consideration when determining a planning application.</p> <p>We are concerned that aspects of Policy SG10 could be interpreted as restrictive and has the potential to stifle rural development and the rural economy especially as some</p>	<p>Policy SG10 has been prepared to guide proposals so that they are designed with care.</p> <p>It is accepted that some detailed requirements could be amended to take account of operational needs. For example Part 3 could be amended to: <u>Where operational requirements allow</u>, larger buildings should be “broken up” using a change in materials, colour or ridge height <u>and</u> where possible, natural materials such as wood and neutral, earth tones should be used to help blend large buildings into the countryside and landscape.</p> <p>Part 7 could be deleted (7. Unsociable hours of operation and storage of hazardous materials should be discouraged.) as protection of local residential amenity would be addressed through the Core Strategy Policies.</p> <p>The Policy is not designed to stop the development of poly tunnels but seeks to ensure that they are sited</p>

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	<p>infrastructure improvements will be regulatory requirements to protect the environment and is necessary for food production.</p> <p>Therefore it should be redrafted to incorporate the comments above.</p>	<p>and designed to minimise adverse visual and environmental impacts.</p> <p>No further changes proposed.</p>
Policy SG11	<p><u>Local Energy Schemes</u> Policy SG11 Community-Led Renewable Energy Schemes</p> <p>We are very supportive of Stretton Grandison’s aspiration to contribute to a low carbon future. Agriculture is uniquely placed to be part of the solution, as both an emissions source and a sink. Therefore the wording of this policy should be changed to include farmer led renewable energy schemes as they can also make a contribution to a low carbon future. The current wording seems to exclude initiatives proposed by local businesses. As farmers we have a special responsibility to protect carbon reserves already in our soils and vegetation. But we must and we can do more. There is no single answer to this problem. To achieve our aim we will need a range of measures that fall under three broad headings:</p> <ul style="list-style-type: none"> • Improving farming’s productive efficiency; • Improving land management and changing land use to capture more carbon; • Boosting renewable energy and the wider bioeconomy. <p>The NFU believes that the agricultural sector is very much part of the solution to decarbonising the UK economy and achieving net zero and we are working on proposals for pilot schemes to introduce policy incentives to bring to life net zero for farmers and growers. But we will only be able to achieve our carbon</p>	<p>Noted.</p> <p>No change proposed.</p>

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	<p>neutral goal with concerted support from government, industry and other key groups to help deliver this challenging, but achievable, ambition.</p> <p>Many thanks for the opportunity to respond to this consultation and we hope that these comments are helpful and will be taken into account.</p>	
Herefordshire Council Environmental Health and Trading Standards		
All / General.	Our department has no further observations to make with regard to this plan from a noise and nuisance perspective.	<p>Noted.</p> <p>No change proposed.</p>
Herefordshire Council Transportation		
<p>P10 Objective EN02</p>	<p>Please find below comments on the Regulation 16 NDP for Stretton Grandison:</p> <p>P10 Objectives for the Environment</p> <p>ENO2 – the line of the old canal needs to acknowledge reinstatement of a towpath in the long term. Since the H&G canal trust have committed to ensuring their towpaths are cycle as well as pedestrian friendly, this would ultimately provide a traffic-free route between Ledbury and Hereford. IN view of their comments that the two A roads are not very cycle friendly it would be good to see some support for promoting the canal particularly encouraging contributions from developers. For info the line of the canal runs along the south western boundary of Canon Frome and to the SW of Stretton Grandison village itself</p>	<p>Noted.</p> <p>See response to SG1 below. The Parish Council welcomes the inclusion of developer contributions to the restoration of the Hereford - Gloucester canal. This would be an incredible asset to the area and could well provide additional revenue opportunities for land owners whose land the canal passes through.</p>

NDP Policy / Section	Reg 16 Comments	Steering Group / Parish Council Response
	(SG2 – Site 1) offering potential for an alternative for pedestrians and cyclists to this awkward section of the A417.	
Policy SG1	<p>P18 Policy SG1 Settlement Boundaries</p> <p>Para 3: could mention provision for and encouragement of active travel provision and requests for developer contributions toward the reinstatement of the canal within the parishes to reflect (or at least refer to) SG5.</p>	<p>Accepted.</p> <p>The following amendment to Policy SG 1 Part 3 is proposed:</p> <p>3. Sites have suitable and safe access and support active travel. The impact of additional traffic from development proposals on existing rural roadworks should be carefully considered and suitable measures should be proposed to encourage appropriate traffic speeds. <u>Where proposals offer opportunities to link to the line of the old Herefordshire - Gloucestershire Canal, developer contributions will be sought towards the reinstatement of the canal and towpath improvements to provide a cycle and pedestrian friendly traffic-free route between Ledbury and Hereford ;</u></p>
P23	P23 When it started talking about development sites I had a sense of déjà vu and realised I'd already commented on these back in February (see attached email).	<p>Noted.</p> <p>No change.</p>
Policy SG8	P50 SG8 Design Principles -Promoting High Quality and Sustainable Design para 4, Proposals for new development	The proposed wording changes to Policy SG8 are supported.

NDP Policy / Section	Reg 16 Comments	Steering Group / Parish Council Response
	<p>should aim to promote walking and cycling and public transport by providing public waiting / seating facilities and linking to existing routes and facilities where possible and including suitable secure storage provision for bicycles. Potential for linking to and developing a traffic free route along the line of the old canal should also be considered.</p>	
P60	<p>P60 Usually there is a section in NDPs on Transport policy. Bearing on mind three of the issues on the list in 8.4 that “needed addressing”, it is surprising there isn’t one here. With active travel as the first two items on the list the plan could make more of a positive statement on enlisting support of developers. Many thanks</p>	<p>Noted. This has been addressed in the above proposed amendments.</p>

Herefordshire Council Strategic Planning Team				
Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comment	
SG1- Settlement Boundaries	SS2; RA2; MT1; SC1; SD1	Y		Noted. No change proposed.
SG2- Housing Sites	SS2; RA2; MT1; LD1; LD2; LD4; SD1; SD3; SD4	Y		Noted. No change proposed.
SG3- Affordable Housing at Canon Frome Court	SS2; H1; H2; H3; LD2; LD4	Y	Such a scheme would need to be viable, having the necessary economies of scale to be able to deliver affordable housing. A development coming forward on this site may have to permit some market housing in order to subsidise affordable housing provision.	Noted. This would be addressed as part of the development management process as and when a planning application comes forward. Core Strategy Policy H2 would apply and this sets out 'In order to enable the delivery of affordable housing some market housing may be permitted as part of the development to subsidise a significant proportion of affordable housing provision. However, evidence will be required – by way of a financial appraisal, in order to demonstrate that the proposed scale of market housing is that

				required for the successful delivery of affordable housing.'
				The NDP Policy has been prepared taking into account comments submitted by the site owners, and viability has not been raised as an issue in these discussions as yet.
SG4- Housing Mix	SS2; H3	Y		Noted. No change proposed.
SG5- Protecting Local Landscape Character and Wildlife	SS6; LD1; LD2	Y		Noted. No change proposed.
SG6- Design Guidelines for Stretton Grandison Conservation Area	SS6; LD4; SD1	Y		Noted. No change proposed.
SG7- Design Principles- Protecting and Enhancing Heritage and Local Character	SS6; LD4	Y		Noted. No change proposed.
SG8- Design Principles- Promoting High Quality and	SS6; SS7; MT1; SD1	Y		Noted. No change proposed.

Sustainable Design				
SG9-Re-use of Former Agricultural Buildings for Local Economic Development	SS5; RA5; RA6	Y	These policies do little to supplement the existing criteria relating to this type of development in the Core Strategy's equivalent policies, RA5 and RA6. It is therefore questionable whether its inclusion is strictly necessary.	Noted. The Steering Group and Parish Council wish to retain the Policy if possible as the Policy was supported by local residents in consultations.
SG10-New Agricultural Buildings and Poly Tunnels	SS5; RA6; LD1	Y		Noted. No change proposed.
SG11-Community-Led Renewable Energy Schemes	SS7; SD2	Y		Noted. No change proposed.
SG12-Reducing Flood Risk	SS7; SD3	Y	Similarly to policy SG9, the policy does not do much to provide any supplementary criteria to that existing in the CS. SD3 covers the issue of flooding more comprehensively. If it is not possible to set out criteria relating to flood risk in a more locally specific context than the CS, it is not considered that the policy's inclusion is necessary.	Noted. The Steering Group and Parish Council wish to retain the Policy if possible as the Policy was supported by local residents in consultations.