

**Latham, James**

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**From:** Turner, Andrew  
**Sent:** 10 June 2020 15:34  
**To:** Neighbourhood Planning Team  
**Subject:** RE: Linton Regulation 16 submission neighbourhood development plan consultation

**RE: Linton 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.

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

General comments:

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

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

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

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

Kind regards

Andrew

**Herefordshire.gov.uk**

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Andrew Turner  
Technical Officer (Air, Land & Water Protection)



The Coal  
Authority



200 Lichfield Lane  
Berry Hill  
Mansfield  
Nottinghamshire  
NG18 4RG

Tel: 01623 637 119 (Planning Enquiries)

Email: [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk)

Web: [www.gov.uk/coalauthority](http://www.gov.uk/coalauthority)

For the Attention of: Neighbourhood Planning  
Herefordshire Council

**[By Email: [neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk) ]**

08 July 2020

Dear Neighbourhood Planning

**Linton Neighbourhood Plan - Regulation 16 (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**

## Latham, James

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**From:** Russell Pryce <Russell@collinsdb.co.uk>  
**Sent:** 07 July 2020 21:53  
**To:** Neighbourhood Planning Team  
**Subject:** Linton NDP - objection  
**Attachments:** Linton Reg 14 NDP objection letter.pdf; Site plan.pdf

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam

I wish to repeat the objection lodged at the reg 14 stage as the comments made remain valid.

In summary, these are

- 1) Unbalanced and disproportionate distribution of housing across the Parish settlements  
Bromsash, a unsustainable settlement with no facilities accommodating a greater housing provision than Linton which is larger, has community facilities and is a higher tier settlement under Core Strategy (CS) policy RA2, Figure 4.14. To further evidence why Linton can accommodate a housing allocation, the sustainability assessment within the Council's Rural Housing Background Report 2013, which underpins CS policies RA1 and RA2 scores Bromsash with 2 points and Linton with 17 points. The CS rural housing strategy is written to facilitate proportionate housing growth in rural settlements like Linton. The NDP is now being used to block even modest proportionate housing to meet local needs and is therefore is not consistent with the intentions and objectives of CS policies RA1 and RA2.
- 2) Suggested settlement boundary revision for Linton to address this conflict with the CS rural settlement spatial strategy.

Kind Regards

**Russell Pryce MRTPI**  
**Planning Manager**

**CDB Planning and Architecture**

Unit 5 Westwood Industrial Estate, Pontrilas, Hereford, HR2 0EL

T: 01981 242928 | M:07931 808200

E: [russell@collinsdb.co.uk](mailto:russell@collinsdb.co.uk) | [www.collinsdb.co.uk](http://www.collinsdb.co.uk)

Linton Parish Council  
Via e-mail

Our Ref: Linton - 5209  
Your ref:  
Please ask for: Russell Pryce  
Direct Line: 01981 242928  
Mobile: 07931 808200  
E-mail: russell@collinsdb.co.uk

3<sup>rd</sup> January 2020

Dear Sir/Madam

## **Linton Parish Neighbourhood Development Plan Regulation 14 Consultation - Objection**

CDB Planning and Architecture is a Herefordshire based planning and architectural consultancy forming part of Collins Design and Build. I write to object to the Regulation 14 Consultation Draft NDP dated September 2019, on behalf of Mrs Barter, the landowner of the land north west and adjacent to Linton village centre.

The objection concerns the limited definition of the settlement boundary for Linton

### **Objection: NDP Policy BGL6 – Settlement Boundaries**

This policy establishes a settlement boundary for Linton village, which will be used for decision making purposes to define areas that may be acceptable for development in principle and areas that are to be categorised as open countryside. There are no objections to the principles of this approach but in terms of Linton, the settlement boundary has been drawn extremely tightly around the existing group of dwellings with no allowance for expansion of the settlement by way of a housing allocation or windfall capacity. This differs to the approach taken in defining the settlement boundaries for both Bromsash and Gorsley where they have been drawn to accommodate additional growth of the settlements through windfall housing.

Herefordshire Core Strategy Policy RA2 (Housing in Settlements outside Hereford and the market towns) identifies the rural settlements where proportionate housing growth can take place and Linton is confirmed as a main village in Figure 4.14 of this policy where a higher proportion of housing is to be focused and deemed sustainable. However, Linton has seen little new housing over the last forty years and more recently under current Core Strategy policies, has experienced considerably less new housing than both Bromsash and Gorsley.

Linton has a small range of facilities and compared with Bromsash which has no amenities, is a far more sustainable settlement. The Core Strategy recognises that allowing proportionate housing in smaller rural communities' aids with maintaining the vitality of communities as well as assisting in supporting the sustainability of existing

facilities, services and amenities both in the Parish and wider area. This is repeated in paragraph 78 of the NPPF which states:

*'To promote sustainable development in rural areas, housing should be located where it will enhance and maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support services.'*

The exclusion of any land within the proposed settlement boundary to allow for modest housing growth in Linton will stifle the long term survival of the remaining facilities in the village.

Our client owns land that adjoins the village centre and is outlined in red on the plan accompanying this letter. This site would form a natural and logical expansion of the village if developed for housing with negligible landscape, highway or ecological impact. Furthermore, a development could be achieved that has no impact on the amenity of near neighbours.

In terms of village character and design, Linton is a linear settlement comprising three clusters of dwellings stretching from the M50 to the north to The Line to the south. Properties generally are sited adjacent the various lanes that traverse through the village and the existing building stock comprises a diverse mix of bungalows, cottages, converted barns and larger two storey dwellings. Properties are predominantly detached.

A proposal can be achieved that reinforces this linear pattern of development by extending the built form along the roadside field boundary connecting the northern cluster of development with the remainder of the village.

There is an existing access that can be utilised meaning the impact on the character of the road and consequential visibility of the dwellings can be minimised as the existing roadside trees and vegetation can be retained.

A density of development that reflects the character of the village with properties having good size gardens along with adequate car and cycle parking including scope for all properties to have garages is also achievable.

All these elements accord with the draft NDP design policy BGL4. The scale of development would also be proportionate with the scale of the settlement and allow for its sustainable growth over the remainder of the Core Strategy period up to 2031.

Finally, the site also offers the opportunity of delivering the size and type of housing the NDP identifies as being required under draft NDP policy BGL7. In particular, the site can provide a mix of housing including smaller 2 and 3 bed properties for first time buyers and young families and dwellings to meet the needs of older people. Such a mix is not achievable with piecemeal individual plot windfall housing and will better aid in meeting local housing need allowing different generations to remain living in the village.

We therefore request that the settlement boundary for Linton within policy BGL6 be redrawn to encompass our clients land. This would address the imbalance of new housing across the Parish settlements that has occurred to date and ensure all three villages can grow in a sensitive and sustainable manner. This could be firmed up in the NDP by identifying our clients land as a proposed housing allocation.

# Collins

**Design & Build  
& Project Management**

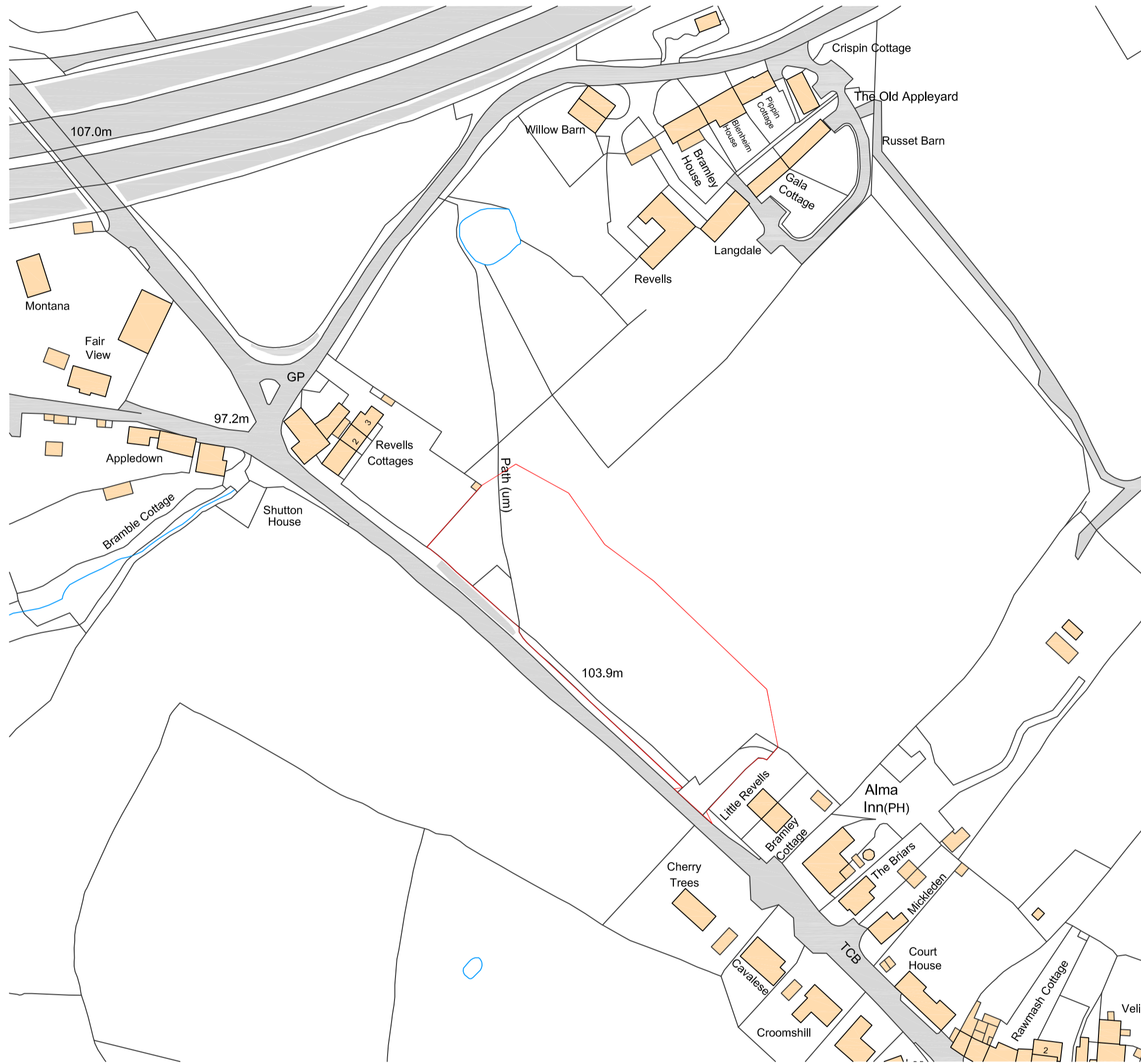
Thank you for the consideration of the objection raised in this letter and I would be happy to discuss any proposed revisions of the NDP.

Yours faithfully

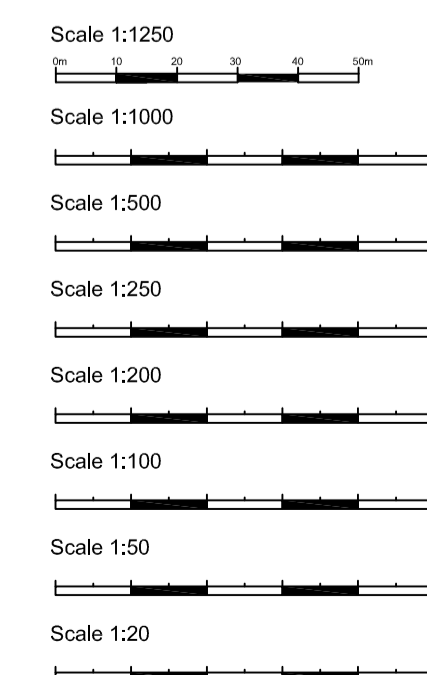
**Russell Pryce MRTPI  
Planning Manager  
CDB Planning and Architecture**



Location plan- 1:1250



Site plan- 1:500



Existing location and site plan



**Collins** Design & Build  
& Project Management

UNIT 5, WESTWOOD INDUSTRIAL ESTATE, PONTRILAS, HEREFORD, HR2 0EL  
TEL: 01981 240682 FAX: 01981 242926

TITLE Proposed developments on land south east of Shutton House and Revells Cottages, Linton

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CUSTOMER	Collins Design and Build	DRN	gcm
JOB No.	5209	DATE	25.9.19
SITE ADDRESS	Linton, Ross on Wye, HR9 7RY	SCALE	As noted
DRG No.	LP-5209-03	A1	

## Latham, James

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**From:** Norman Ryan <Ryan.Norman@dwrwymru.com>  
**Sent:** 25 June 2020 14:18  
**To:** Neighbourhood Planning Team  
**Subject:** {Disarmed} RE: Linton Regulation 16 submission neighbourhood development plan consultation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

Thank you for consulting Welsh Water on the below.

We were consulted on the Reg 14 consultation in 2019 and as such have nothing further to add at this time.

Kind regards,



**Ryan Norman**

Lead Forward Plans Officer | Developer Services |  
Dŵr Cymru Welsh Water

T: 0800 917 2652 | E: 40719 | M: 07557812548

A: PO Box 3146, Cardiff, CF30 0EH



W: [dwrwymru.com](http://dwrwymru.com)

E: [developer.services@dwrwymru.com](mailto:developer.services@dwrwymru.com)

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**From:** Neighbourhood Planning Team <[neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk)>  
**Sent:** 27 May 2020 10:30  
**Subject:** Linton Regulation 16 submission neighbourhood development plan consultation

\*\*\*\*\* External Mail \*\*\*\*\*

Dear Consultee,

Linton 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: **[MailScanner has detected a possible fraud attempt from "eur03.safelinks.protection.outlook.com" claiming to be https://www.herefordshire.gov.uk/directory\\_record/5484/linton\\_neighbourhood\\_development\\_plan](https://www.herefordshire.gov.uk/directory_record/5484/linton_neighbourhood_development_plan)**

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

The consultation runs from 27 May 2020 to 8 July 2020.

If you wish to make any comments on this Plan, please do so by e-mailing: [neighbourhoodplanning@herefordshire.gov.uk](mailto: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



## Latham, James

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**From:** Stephen Challenger <s.challenger@hereford.anglican.org>  
**Sent:** 30 June 2020 11:49  
**To:** Neighbourhood Planning Team  
**Subject:** Bromsash, Gorsley and Linton (Linton Parish) NDP- Consultation Statement - March 2020 Regulation 16 Objection  
**Attachments:** Hereford DBF - Linton glebe plan (1).pdf

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir / Madam

1. It was unfortunate that the Hereford Diocesan Board of Finance ('the Board'), as an absentee landowner, was not consulted and only became aware of the plan at the Reg.14 stage. It is noted that Bromsash, Gorsley and Linton Charities Gorsley Baptist Church were consulted.

2. For the avoidance of doubt the Board, as owner of the land, endorses the designation of its land beside the Village Hall in Linton LGS6 as Local Green Space. This is appropriate in view of its setting and the street scene.

3. The Consultation Statement (CS) at page 16 rejects the Board's request to extend the Linton settlement boundary: Policy BGL6 and Plan 7, Linton village policies. The Board reiterates its claim that the inclusion of part of the glebe outlined in red would round off the settlement boundary and provide a small development in accordance with the remainder of policy BGL6: appended plan.

4. The CS rejected the variation with the response that: "Community consultation in May 2019 was strongly supportive of the proposed Linton settlement boundary, which did not include the site.". As the site was not included that is hardly surprising.

5. The response stated, "The boundary between the site and the larger field is not defined on the ground.". This is true, because to include more of the field would be wrong. It would detract from the built-up form of Linton as described in the March 2020 development plan (underlining added):

5.13 Linton is a compact village grouped around the grade I listed church of St. Mary's. The Conservation Area is centred on the church and churchyard, which includes many listed headstones, a churchyard cross and an ancient yew. Limited 20th century development has taken place outside the Conservation Area to the north and the west, though the village continues to demonstrate a historic nucleated form

6. The March 2020 plan refers to Herefordshire Council's Neighbourhood Planning Guidance Note 20 Guide to settlement boundaries. That guide includes:

Protects the countryside from unnecessary development and prevents ribbon development.

Allows the development of small sites which cannot be identified as allocations.

Your settlement boundaries should be drawn to facilitate an appropriate level of proportional growth within the plan period. If land within the boundary is not formally allocated, there will be a requirement to demonstrate that there is enough available capacity within the boundary to enable development to take place. The Board's proposal would meet those criteria.

7. The Board has considered the housing delivery figures in paras 5.1-5.5 of the March 2020 plan. It has also taken into account Herefordshire Council 'Five year housing land supply (2019 - 2024) July 2019 Annual Position Statement at 1st April 2019' which states (underlining added):

When assessed against the Core Strategy, the current supply is 4.05 years. Before any discounting of sites was carried out this year's permission was 125 dwellings less than 2018. Changes to the NPPF has meant there is a need

to be more rigorous with sites in terms of what is considered to be deliverable. Sites with permissions and allocations have been discounted where there is inactivity or lack of information on them coming forward through the planning process or being developed. This has affected the five year supply figure quite significantly and hence the drop from 2018 where the supply was 4.55yrs to 4.05yrs in 2019. This year's housing completions totals (666) are less than last year's total of 776. However the target has also increased by approximately 300 making it more difficult to achieve a supply at current development rates.



8. The March 2020 plan at 5.1 states, "Housing development outside these villages is to be restricted to avoid an unsustainable pattern of development". The Board's proposal would not offend this principle. The Board's proposal would make a small but worthwhile addition to Herefordshire Council's need to achieve a 5 year housing supply.

9. The Board respectfully invites the inspector to extend the Linton settlement boundary to include the Board's land as shown on the enclosed plan.

Yours sincerely

Stephen Challenger  
Property Secretary  
Diocese of Hereford



-  Settlement boundary
-  Local Green Space

Glebe owned by the Hereford Diocesan Board of Finance

## Latham, James

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 07 July 2020 21:37  
**To:** Neighbourhood Planning Team  
**Subject:** A comment on a proposed Neighbourhood Area was submitted

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Fiona
Last name	Morison
Which plan are you commenting on?	Linton
Comment type	Support
Your comments	I support the Neighbourhood Development Plan. The decisions have been made with care and thought, referencing the needs and priorities of the local community. It is to be hoped that in the future, Herefordshire Council take into account the democratically arrived at wishes of the people of Linton.

## Latham, James

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**From:** Jennifer Jones <Jennifer.Jones@publicagroup.uk>  
**Sent:** 28 May 2020 12:16  
**To:** Neighbourhood Planning Team  
**Subject:** Linton Regulation 16 submission neighbourhood development plan consultation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Thank you for your consultation email and the opportunity to comment on the Linton Neighbourhood Development Plan. The Forest of Dean District Council has no comment to make regarding the plan.

Kind Regards

Jennifer

Jennifer Jones BSc(Hons), BTP, MRTPI  
Planning Officer  
Forest of Dean District Council.

Tel 01594 812325

Please note that my work days are Tuesday, Wednesday and Thursday.

**Latham, James**

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**From:** Boland, Peter <Peter.Boland@HistoricEngland.org.uk>  
**Sent:** 03 July 2020 09:49  
**To:** Neighbourhood Planning Team  
**Cc:** Dean, Adam  
**Subject:** Linton NP

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear James,

Please find below Historic England's comments on the Linton Neighbourhood Plan (our ref: PL00637353).

**LINTON NEIGHBOURHOOD PLAN – REGULATION 16 CONSULTATION.**

Thank you for the invitation to comment on the Submission Neighbourhood Plan. Our previous comments on the Regulation 14 Plan remain entirely relevant that is:

*“Historic England is supportive of both the content of the document and the vision and objectives set out in it. We are pleased to note the Plan is well informed by reference to the Herefordshire Historic Environment Record and including historic landscape analysis.*

*The emphasis on the conservation of local distinctiveness and village and landscape character through good design, including through the protection of designated and undesignated heritage assets, along with the recognition afforded to green space and historic farmsteads and is highly commendable.*

*Overall the plan reads as a well-considered, concise and fit for purpose document which we consider takes a suitably proportionate approach to the historic environment of the Parish”.*

Beyond those observations we have no further substantive comments to make on what Historic England considers is a good example of community led planning.

I hope you find this advice helpful.

Historic Places Adviser | West Midlands  
Historic England | The Axis  
10 Holliday Street | Birmingham B1 1TF

Tel: 0121 625 6887

[www.HistoricEngland.org.uk](http://www.HistoricEngland.org.uk) | [@HistoricEngland](https://twitter.com/HistoricEngland)



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29 May 2020

[avisonyoung.co.uk](http://avisonyoung.co.uk)

Herefordshire Council  
[neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk)  
via email only

Dear Sir / Madam  
**Linton Neighbourhood Plan Regulation 16 Consultation  
May – July 2020  
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

#### **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 across England, Wales and Scotland.

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.

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.

#### **Proposed development sites crossed or in close proximity to National Grid assets:**

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.

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

National Grid provides information in relation to its assets at the website below.

- [www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/](http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/)

Please also see attached information outlining guidance on development close to National Grid infrastructure.



### **Distribution Networks**

Information regarding the electricity distribution network is available at the website below:

[www.energynetworks.org.uk](http://www.energynetworks.org.uk)

Information regarding the gas distribution network is available by contacting:

[plantprotection@cadentgas.com](mailto:plantprotection@cadentgas.com)

### **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 not already included:

**Matt Verlander, Director**

[nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)

Avison Young  
Central Square South  
Orchard Street  
Newcastle upon Tyne  
NE1 3AZ

**Spencer Jefferies, Town Planner**

[box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)

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

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

**Matt Verlander MRTPI**

**Director**

**0191 269 0094**

**[matt.verlander@avisonyoung.com](mailto:matt.verlander@avisonyoung.com)**

**For and on behalf of Avison Young**

## 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.

### Electricity assets

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.

National Grid's 'Guidelines for Development near pylons and high voltage overhead power lines' 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>

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.

National Grid's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: [www.nationalgridet.com/network-and-assets/working-near-our-assets](http://www.nationalgridet.com/network-and-assets/working-near-our-assets)

### Gas assets

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.

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.

National Grid's 'Guidelines when working near National Grid Gas assets' can be downloaded here: [www.nationalgridgas.com/land-and-assets/working-near-our-assets](http://www.nationalgridgas.com/land-and-assets/working-near-our-assets)

### How to contact National Grid

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:

- National Grid's Plant Protection team: [plantprotection@nationalgrid.com](mailto:plantprotection@nationalgrid.com)

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>

Date: 22 June 2020  
Our ref: 318490  
Your ref: Linton Neighbourhood Plan



James Latham  
Herefordshire Council  
Plough Lane  
Hereford  
HR4 0LE

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

**BY EMAIL ONLY**

[neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk)

T 0300 060 3900

Dear Mr Latham

**Linton Neighbourhood Plan - Regulation 16**

Thank you for your consultation on the above dated 27 May 2020.

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

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

**Natural England does not have any specific comments on the Linton Neighbourhood Plan.**

For any further consultations on your plan, please contact: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Victoria Kirkham  
Consultations Team

## Latham, James

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**From:**  
**Sent:** 06 June 2020 17:55  
**To:** Neighbourhood Planning Team  
**Subject:** Neighbourhood Development Plan for Linton Parish Council

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

We wish to comment on this plan as residents of Bromsash.

A lot of work went into this plan, and the consultation process was thorough in order to ensure that this was the view of the community as a whole. We therefore record our support for the Plan. And yet planners have very recently approved new development that

1. over-ran the settlement boundary laid down for Bromsash (Section 5.9, Plan 5);
2. added to the intrusion into views deemed a priority for safeguarding (Policy BGL2 4A and B)
3. added housing where more than sufficient new development has already taken place in order to meet the Neighbourhood Area Housing Requirement (Sections 5.1 – 5.5)
4. added housing not of a kind to improve the housing mix in favour of smaller / affordable units (Section 5.21).

This at a time when there are several properties on the market before the completion of 8 new-build.

The local community has strongly expressed a wish for housing to be tightly contained within a specified area, and whilst we can all sympathise with the need for new and affordable housing, it would seem far better to redevelop urban or semi-urban brownfield sites as a priority, with an emphasis on access to local services, sustainable transport, and jobs, than to allow further development in a settlement which has not a single identifiable facility. If greenfield development must take place, then surely it should be near to established towns.

The other issue which needs to be addressed is that Bromsash is divided between Linton and Weston under Penyard. The latter, in its NDP, identified that land in Bromsash might be open to development, but expressed an intention to discuss this with its neighbour Council. We cannot ascertain if such discussions have taken place. Thus we have the situation that one Council involved has drawn a sensibly tight settlement boundary as far as its own boundaries allow, but the other has left matters more open, leaving the settlement at risk of yet more development which would have to debouch on to a very minor road (C1280) heavily used by agricultural vehicles.

As most of Bromsash is in Linton, we feel that there should be a minor adjustment of parish boundaries so that the settlement comes under one Parish Council (Linton), which can then consult with residents as to the appropriate settlement boundary.

Finally, if Neighbourhood Development Plans are to have any meaning at all, and if local democracy is not a sham, planners should read paragraph 1.1 of this Plan and take note :

*Neighbourhood Development Plans (are) part of the statutory planning framework governing the development and use of land in the area. **When planning applications are made, they must be decided in accordance with this framework unless there are overriding circumstances to the contrary.***

Paul & Jonquil Dodd (Mr & Mrs. P.M. Dodd)

**Representations on Regulation 16 Bromsash, Gorsley and Linton  
Neighbourhood Development Plan 2011 - 2031  
on behalf of Mr. Jonathan Collier, ADDRESS REDACTED.**

Please see below the representations of Mr. Jonathan Collier (“the Correspondent”) on the Regulation 16 Submission Draft Neighbourhood Development Plan (NDP) dated March 2020. These representations refer to the correspondent’s own property, ADDRESS REDACTED, and adjoining areas of land not in the correspondent’s ownership. These other areas are referred to only to ensure that the draft NDP meet the ‘Basic Conditions’.

**Basic Conditions**

The ‘Basic Conditions’ that all NDPs must meet are as follows:

- NDPs are to have regard to national policy;
  - NDPs must contribute to sustainable development;
  - NDPs must be in general conformity with policies in the development plan;
- and
- NDPs must be compatible with EU obligations.

The correspondent has the following representations to make on the Submission version of the NDP.

## **Overall Comment**

The Government has recently announced that it will undertake a prompt and the most significant overhaul of the planning system since its inception in 1947.

Until the details of this overhaul are known, it is not possible to conclude that the draft NDP will fulfil the Basic Conditions having regard to national policy or whether or not it will contribute to sustainable development as defined in a revised NPPF. Therefore, the draft NDP should not progress to a referendum or towards it being 'made' until the outcome of the Government's review of the planning system is known and whether the draft NDP needs to be re-formulated.

## **Specific Comments**

### Section 3: Vision and Objectives (page 9)

1. (paragraph 3.3): under Objective 2, there is a need to add the central Government objective to "significantly boost" the supply of new housing under paragraph 59 of the NPPF under the plan making process. Without the inclusion of this Government objective, the NDP would fail to pay sufficient regard to national policy and would fall short of reasonable expectations of the NDP.

### Section 4: Environment (page 11)

2. Paragraph 4.3): the following should be added to the last sentence:  
"....and the planting of new trees and hedges should be encouraged and considered a benefit in any development proposal".

## Section 5: Housing (page 23)

3. (paragraph 5.4): The NDP recognises that the Core Strategy requires housing growth in the identified settlements is proportionate to the community and its needs. However, there is no recognition that the percentage increase of proportionate growth of Bromsash, Gorsley and Linton (14%) is a minimum figure and not a ceiling. Given this, the NDP should recognise and reflect that Gorsley is one of the most sustainable settlements in the Ross Housing Market Area justifying it hosting much more housing than the minima figure of 14% growth. Based upon the Council Rural Housing Background Paper 2013 – part of the evidence of Core Strategy Policies RA1 and RA2 - Gorsley is the sixth most sustainable rural settlement in the Ross-on-Wye Housing Market Area only one of which lies to the east of Ross-on- Wye (see **Appendix 1**).

4. In this respect, the NDP would be contrary to Core Strategy Policies RA1 and RA2 which identify Gorsley as a main focus for development in the area. Nor is there any recognition in the NDP, nor is it driven, by the need for it to “significantly boost” new housing in accordance with paragraph 59 of the NPPF. It adopts a policy of restraint upon future development for the next 11 years at odds with its strategic role in the Core Strategy spatial strategy.

5. NDP seeks to severely limit new development in Bromsash and Linton which might be justified by virtue of their relative unsustainability. However, this makes it even less appropriate for a similar approach to be adopted in Gorsley which is by far the most sustainable settlement in the NDP area.

6. For these reasons, the NDP promotes less development in Gorsley than is earmarked in the strategic policies for the area contained in the Core Strategy contrary to paragraphs 29 and 59 of the NPPF. Therefore, the NDP does not fulfil two of the ‘Basic Conditions’ that it accords with the Core Strategy and national planning policy.

7. Table 1 on page 23 is based upon these unjustified premises. It underestimates the level of further growth that should occur at Gorsley if it is to



achieve the objective of the Core Strategy of making Gorsley a main focus of development. This has implications for the draft settlement boundary of the NDP (see below). This also points to the need for the NDP to include allocations of land for further housing and not to rely upon the Settlement Boundary to provide windfall housing sites.

8. The inadequate provision for future growth is clearly demonstrated having regard to the NPPF. Herefordshire Council has not been able to demonstrate a five year of deliverable housing land since the adoption of the Herefordshire Core Strategy in October 2015. Since then, its shortfall in housing supply has been persistent, grown to the point that as of April 2019 it is substantial. As of this date, the residual shortfall is approximately 1700 dwellings (**Appendix 2**). In all likelihood, this shortfall will continue for a further 12 months or more. The implications of this is that the NDP will be 'out of date' carrying less than full weight even after it has been made. Moreover, the omission of housing allocations in the NDP will result in paragraph 14 of the NPPF not being engaged. Consequently, the 'tilted balance' of paragraph 11 of the NPPF will continue to be engaged in the medium-term for Gorsley housing proposals in the absence of housing allocations. This demonstrates the unsoundness of the NDP in this respect. The NDP should be formulated such that the 'tilted balance' does not apply at the point of it being 'made'

#### Settlement Boundaries (page 24)

9. (paragraph 5.6): the draft boundaries are described as showing the *"planned extent of the main built-up form for each village and generally follow physical features, principally curtilages marked by fence or hedgerows. They have been prepared having regard to criteria in Herefordshire Council guidance"*. This 'guidance' refers to the Council's Guidance Note 20; Guide to Settlement Boundaries (June 2015).

10. The NDP aims to restrict new housing development by the application of a strict settlement boundary rather than rely upon housing allocations.

11. The Correspondent's objection to this aspect of the NDP area as follows:

(i) That the NDP fails to adhere to its own objective of defining the draft settlement boundary in accordance with the Council's 2015 guidance on settlement boundaries; and

(ii) That failure to adhere to the Council's 2015 guidance would provide insufficient scope for 'windfall' schemes to significantly boost the supply of housing in the sustainable rural settlement of Gorsley.

(i) Failure of NDP to Adhere to Guidelines to Define Settlement Boundaries

*ADDRESS REDACTED, the Allotments and Housing Along Linton Road*

12. The draft settlement boundary excludes a historic part of the settlement that extends along both sides of Linton Road eastwards that comprises the south-eastern edge of Gorsley. This part of the village includes the village allotments, housing to the east, ADDRESS REDACTED and land along its road frontage between a new two house scheme to the west and approved housing schemes to the east. The approval of these recent housing schemes confirms the understanding of Herefordshire Council that this string of houses along Linton Road is integral to the settlement. The draft settlement boundary should include all of this area (see **Appendix 3** for suggested enlargement of settlement boundary outlined in red).

13. It is the stated objective of the NDP to exercise the Council's 2015 *Guide to settlement boundaries* when defining the Gorsley settlement boundary (see paragraph 5.6, page 24). Under the heading 'Criteria used to define the extent of the settlement boundaries' the guidance advocates the inclusion within settlement boundaries the following:

(i) "Physical features – *wherever* possible try to allow the boundaries to follow physical features, such as buildings, field boundaries or curtilages.... "

(ii) "Planning History – you may wish to consider existing commenced planning permissions....."

(iii) “Village enhancements – Settlement boundaries *should* include buildings and associated land that make up the village form....”

(iv) “Recent development – Where appropriate, settlement boundaries should include new development which may have occurred recently. It is also *advisable* to include sites that have received planning permission within the settlement boundary...”

(v) “Important amenity areas – These form part of the character of the settlement and could be identified and protected by policy and included in the settlement boundary due to the contribution to built form.”

(vi) “Your settlement boundary *should* be drawn to facilitate an appropriate level of proportional growth within the plan period. If land within the boundary is not formally allocated, there will be a requirement to demonstrate that there is enough available capacity within the boundary to enable development to take place.”

14. The draft settlement boundary and its exclusion of land at ADDRESS REDACTED and housing development along this stretch of Linton Road does not adhere to the Council guidance for the following reasons.

15. Progressing from the west, the settlement boundary excludes the rear most part of a two-house scheme to the north-west of ADDRESS REDACTED (see **Appendix 4**) Therefore, it does not accord with guidance principles (i), (ii) or (iv).

16. The exclusion of the allotments and its buildings from the settlement boundary does not accord with guidance principles (iii) and (v). The exclusion of houses stretching along Linton Road, including the road frontage of ADDRESS REDACTED, does not accord with guidance principles (i), (ii), (iii) and (iv).

17. Further, Herefordshire Council has approved in recent times the erection of two houses and a single housing fronting Linton Road on the grounds that this group of village houses forms part of the main built up area of Gorsley under Policy RA2 (**Appendix 5**). Its exclusion from the settlement boundary would be inconsistent with these decisions and apply a much stricter restraint upon new housing development than is exercised under the Core Strategy. This approach is contrary to guidance principle (vi) which requires the NDP to be drawn in such a way as to “facilitate”

further appropriate levels of proportionate growth. The unjustified exclusion of the Linton Road housing group from the settlement boundary would prevent, not facilitate, new housing in this segment of Gorsley.

18. The purpose of plan-making is to review and test development plan objectives and assumptions and the extent over which those policies are to be applied. Since 2007, Gorsley has been required to act as a main focus of development in the area, development plans must significantly boost new housing and the lack of a five year supply of housing sites renders planning policy 'out of date'. These additional responsibilities on planning authorities justifies the enlargement of the previous Gorsley settlement boundary to meet the additional need for more housing of sufficient numbers to meet these requirements.

19. The Herefordshire Council's 'Rural Housing Background Paper' dated March 2013 formed part of the evidence base for the Core Strategy. It framed Core Strategy Policies RA1 and RA2 which supports new housing at Gorsley. It follows, therefore, that the draft NDP should adhere to Policy RA1 and RA2 as the Council intended them to be applied as expressed in, amongst other documents, the Rural Housing Background Paper 2013 (see **Appendix 1**).

20. The Background Paper identified that 184 dwellings existed within the 'main village envelope' (see page 37). The number of houses provided in 2013 is the base for the proportionate level of growth of housing in the village and would have included the approximately 20 dwellings along Linton Road. It is therefore, highly inconsistent for the draft NDP settlement boundary to exclude this appreciable collection of houses which is contiguous with the remainder of the village, when the evidence base for strategic policies RA1 and RA2 included them. The clear implication of this is that the draft settlement would result in less development than was envisaged under strategic policies thus not meeting one of the Basic Conditions.

21. It is noted that the tightly-drawn draft NDP settlement boundary resembles closely that of the previous Herefordshire Unitary Development Plan 1996 – 2011. (see of UDP village settlement boundary and extract of 'Introduction' **Appendix 6**)

22. It is inappropriate to rely upon essentially the same settlement boundary adopted under the UDP and applicable up to 2011 (the end of that plan period) to facilitate further housing at Gorsley up to 2031. This is particularly so when one considers the extent of proposed Local Green Space allocations within the settlement boundary which will preclude new housing of large tracts of land within the village.

23. The proposed tightly-drawn settlement boundary is unlikely to generate sufficient numbers of new houses to ensure the delivery of the quantum of new housing in Gorsley commensurate with its sustainability credentials. The premise of the NDP that the minimum level of proportionate growth for Gorsley has been exceeded as a basis for ensuring it fulfils its role as a focus for rural development up to 2031 is unfounded. The inclusion of all of the Correspondents' road frontage land within the settlement boundary would contribute to the provision of the number of new houses to meet the appropriate degree of 'proportionate growth' of this village in accordance with Policy RA1.

*ADDRESS REDACTED*

24. Specifically, in relation to ADDRESS REDACTED, the relevant criteria of NDP Guidance Note 20 are as follows:

- *Lines of communication* – ADDRESS REDACTED and its grounds along Linton Road abut housing to the east and west, a single dwelling to the north and the allotments all of which are, or should, be included in the settlement boundary for the reasons given above. Applying this criterion supports the assertion that the ADDRESS REDACTED road frontage should be included within the settlement boundary.
- *Physical features* defined by buildings, field boundary and curtilages: The subject area is defined in most directions by existing dwellings or the allotments. It is acknowledged that the guidelines facilitate the exclusion large gardens in certain circumstances to "limit expansion". However, where there is a need to provide more houses than is proposed in the NDP, it is not justified to exclude the whole of ADDRESS REDACTED from the settlement boundary.

- *Planning history* – There is no planning history relating to the grounds of ADDRESS REDACTED. However, given the position and proximity of surrounding houses, the property forms part of the village to a far greater extent than it does the open countryside.
- *Village enhancements* – Not applicable.
- *Recent development* – Not applicable
- *Important amenity areas* – Not applicable.

25. ADDRESS REDACTED and its road frontage meets all of the criteria of the Council's Guidance Note 20 relevant to this property. Consequently, in accordance with its relevant objective criteria and the reasons given above, the Correspondent's road frontage (see outline in red on the attached OS extract) should be incorporated within the draft settlement boundary.

(ii) Settlement Boundary Would Provide an Insufficient Supply of Housing Growth

26. The purpose of plan-making is to review and test development plan objectives and assumptions and the extent over which those policies are to be applied. Since 2007, Gorsley has been required to act as a main focus of development in the area, development plans must significantly boost new housing and the lack of a five year supply of housing sites renders planning policy 'out of date'. These additional responsibilities on planning authorities justifies the enlargement of the previous Gorsley settlement boundary to meet the additional need for more housing of sufficient numbers to meet these requirements.

27. The Herefordshire Council's 'Rural Housing Background Paper' dated March 2013 formed part of the evidence base for the Core Strategy. It framed Core Strategy Policies RA1 and RA2 which supports new housing at Gorsley. It follows, therefore, that the draft NDP should adhere to Policy RA1 and RA2 as the Council intended them to be applied as expressed in, amongst other documents, the Rural Housing Background Paper 2013 (see **Appendix 1**).

28 The Background Paper identified that 184 dwellings existed within the 'main village envelope' (see page 37). The number of houses provided in 2013 is the base for the proportionate level of growth of housing in the village and would have included the approximately 20 dwellings along Linton Road. It is therefore, highly inconsistent for the draft NDP settlement boundary to exclude this appreciable collection of houses which is contiguous with the remainder of the village, when the evidence base for strategic policies RA1 and RA2 included them. The clear implication of this is that the draft settlement would result in less development than was envisaged under strategic policies thus not meeting one of the Basic Conditions.

29 The proposed tightly-drawn settlement boundary is unlikely to generate sufficient numbers of new houses to ensure the delivery of the quantum of new housing in Gorsley commensurate with its sustainability credentials. The premise of the NDP that the minimum level of proportionate growth for Gorsley has been exceeded as a basis for ensuring it fulfils its role as a focus for rural development up to 2031 is unfounded.

30 The draft Settlement Boundary adheres closely the previous Settlement Boundary of the Herefordshire Unitary Development Plan which was the development plan between 2007 and 2015 (**Appendix 5**). It is therefore unrealistic for the NDP to adequately provide for housing growth up to 2031 by relying upon essentially the same Settlement Boundary adopted in a previous development plan up to 2015.

31 This demonstrates a need to enlarge the Settlement Boundary to include more village properties including ADDRESS REDACTED and its road frontage and/or to make housing allocations. Otherwise, the NDP will not accord with national policy to significantly boost the supply of housing or contribute to sustainable development.



### Housing Mix (page 29)

32 The correspondents support the broad principle of requiring new housing to contribute to a reasonable mix of housing sizes in accordance with local housing needs under draft Policy BGL7 (page 31).

33. However, it should be recognised that on some sites, this objective would entail a higher density of development to ensure the viability and delivery of potential housing sites and to better ensure that smaller houses are retained in the long term as such. Not to permit higher density of development in these circumstances would not make an effective use of land in accordance with paragraphs 8 and 117 of the NPPF.

### Section 8: Delivering the Neighbourhood Development Plan (page 38)

34 The correspondents consider that it should be clarified in this section that the NDP once 'made' should be applied in accordance with Section 38(6) of the Planning Act.

35 Further, it should be made clear that when relevant, the NDP may have to be reviewed. This is due to a likely change in material considerations over time. Further, the NDP will be 'out of date' should there continue to be a shortfall in the supply of deliverable housing sites the county under paragraph 11 of the NPPF.

## Appendix 1

**ROSS**  
**Rural HMA Housing Target**  
**1150**

	Approximate number of residential dwellings within the main village envelope	Strategic Housing Land Availability Assessment	Affordable Housing Needs Survey	Public transport provision	Pub / Restaurant	Village Hall	Primary School	Shop	Post office	Existing employment site (within 5km)	Additional Key Services	Floodzone 3	AONB	Hierarchy matrix total points
Liancloudy	21			3										5
Didley	21		6	3										4
Brockhampton	22		2	1		3							✓	10
Thruxtun	24		15 <sup>1</sup>	3										6
Rushall	26			0										3
Orcop	27		6 <sup>2</sup>	3		3						✓		9
Three Ashes	27			0										2
Aconbury	29		1	3										6
St Weonards	30			3		3	3	3	3					21
Lianwarne	30		7	3		3						✓		10
Allensmore	33		7 <sup>3</sup>	3		3				2		✓		11
Kerne Bridge	33		12 <sup>4</sup>	3								✓		4
Broad Oak	37		11 <sup>5</sup>	3			3	3						11
Harewood End	37		0	3										8
Much Birch/ The Axe & Cleaver	38			3										10
St Owens Cross	38		6 <sup>6</sup>	3										9
Kilpeck	39		1	3		3		3	3					13
Aston Ingham	39		2	1		3								13
Upton Crews	40		6 <sup>7</sup>	0										2
Symonds Yat (West)	46		11 <sup>8</sup>	3						1	1			13
Bishopswood	47		12 <sup>4</sup>	0				3						10
Welsh Newton Common	48			1		3		3	3					17
Llangarron	48			1		3								10
Glewstone	51		0	1									✓	3
Cobhall Common	53		7 <sup>3</sup>	3										4
Howle Hill	55		12 <sup>4</sup>	3										5
Winnal	56	5	7 <sup>3</sup>	3			3	3	3	2				18
Wormbridge	58		2	3				3						13
Orcop Hill	61		6 <sup>2</sup>	1										5
Pontrilas	66	6	4	3		3		3	3	2		✓		21
Woolhope	67	127	4	3		3		3	3				✓	17





## Appendix 2



## **1. Introduction**

- 1.1 This Statement sets out an assessment of the housing land supply position in Herefordshire taking into account the requirements of the National Planning Policy Framework (NPPF) at 1<sup>st</sup> April 2019.
- 1.2 With the government aim of achieving faster delivery of new homes, a reviewed approach to the five year supply has been set. The context to the updated Framework, as has been repeatedly cited by Government, is to address the severe issues of housing undersupply and affordability prevalent across the country. It is of no surprise therefore that the most substantial policy changes relate to the delivery of housing and the more effective use of land. It is about ensuring homes are actually built.
- 1.3 The approach to engagement on this supply paper is set explained at the relevant sections within this document.

## **2.0 Planning Policy**

### **National Planning Policy Framework**

- 2.1 The NPPF 2019 indicates that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years supply of housing against their housing requirements set out in adopted strategic policies or against the local housing need where the strategic policies are more than five years old (paragraph 73). The supply of specific deliverable sites should in addition include a buffer:
- 5% to ensure choice and competition in the market for land; or
  - 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
  - 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply<sup>1</sup>.

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<sup>1</sup> (NPPF Footnote 39) From November 2018, this will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.

**Figure 10. Assessment against Core Strategy stepped trajectory.**

	Source	Homes	Notes
A	Core Strategy 2011 – 2031	16500	
B	Core Strategy requirement 1/4/2011 – 1/4/2019	5550	Using Trajectories: 600 dpa 2011-2016 (5yrs.) 850 dpa 2016-2019 (3 yrs.)
C	Homes Completed (net) 1/4/2011 – 31/3/2019 (past eight years)	3821	Net reduction includes demolitions and conversions
D	Requirement for next five years	4400	Using Trajectories 19/20– 20/21 – 850 pa (2 yrs) 21/22 – 23/24 900 pa (3 yrs)
E	Plus Residual Shortfall	1729	(over next five years as per NPPG)
F	Plus 20% buffer	1229	As recommended by Core Strategy Inspector and NPPF 2018
G	<b>Total Requirement</b>	<b>7358</b>	
H	<i>Annualised requirement</i>	1472	
I	<b>Total Deliverable dwellings</b>	5966	
J	<b>Housing Supply</b>	<b>4.05yrs</b>	I / H

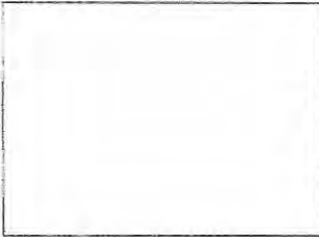
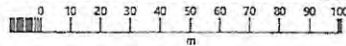
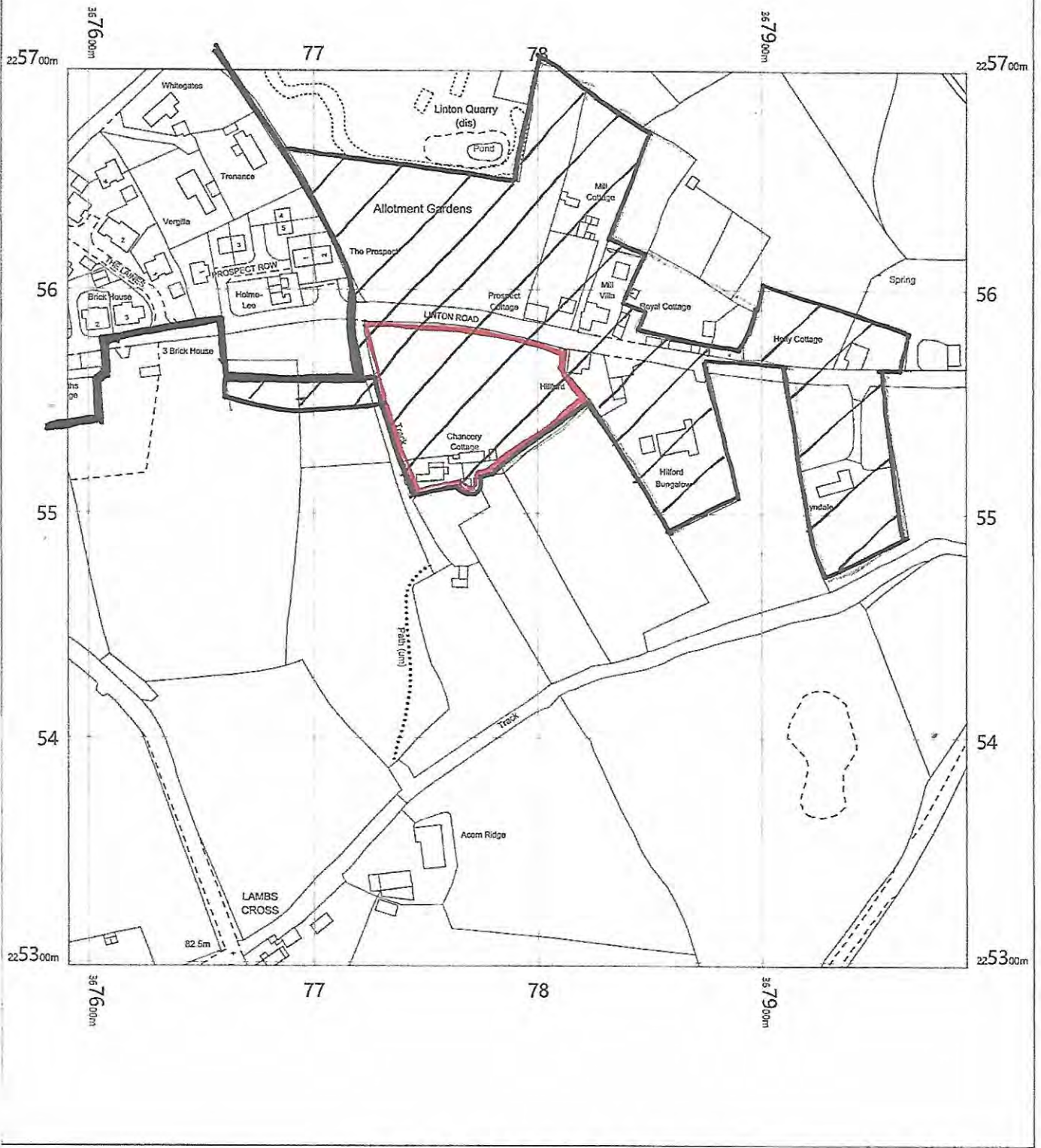
## 5. Housing land supply for Herefordshire

- 5.1 When assessed against the Core Strategy, the current supply is 4.05 years. Before any discounting of sites was carried out this year's permission was 125 dwellings less than 2018. Changes to the NPPF has meant there is a need to be more rigorous with sites in terms of what is considered to be deliverable. Sites with permissions and allocations have been discounted where there is inactivity or lack of information on them coming forward through the planning process or being developed. This has affected the five year supply figure quite significantly and hence the drop from 2018 where the supply was 4.55yrs to 4.05yrs in 2019. This year's

## Appendix 3



172713- 2 Lines



OS MasterMap 1250/2500/10000 scale  
 Tuesday, December 24, 2019, ID: HMC-00850058  
 www.themapcentre.com

1:2500 scale print at A4, Centre: 367791 E, 225498 N

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## Appendix 4

# PLANNING PERMISSION

**Applicant:**

Mr Paul Smith  
Paul Smith Associates  
1a Mill Street  
Hereford  
Herefordshire  
HR1 2NX

**Agent:**

---

Date of Application: 17 October 2017

Application No:  
173830

Grid Ref:367693:225567

---

**Proposed development:**

**SITE:** Smiths Cottage, Linton Road, Gorsley, Ross-on-Wye,  
**DESCRIPTION:** Proposed erection of two dwellings with garages, construction of new vehicular access and associated works

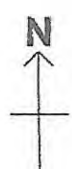
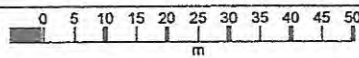
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THE COUNTY OF HEREFORDSHIRE DISTRICT COUNCIL hereby gives notice in pursuance of the provisions of the above Acts that PLANNING PERMISSION has been GRANTED for the development described above in accordance with the application and plans submitted to the authority subject to the following conditions:

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.  
  
Reason: Required to be imposed by Section 91 of the Town and Country Planning Act 1990.
- 2 The development hereby approved shall be carried out strictly in accordance with the approved plans received 10<sup>th</sup> October 2017 and the schedule of materials indicated thereon.  
  
Reason: To ensure adherence to the approved plans and to protect the general character and amenities of the area in accordance with the requirements of Policy SD1 of the Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework.
- 3 Before any other works hereby approved are commenced, visibility splays shall be provided from a point 0.6 metres above ground level at the centre of the access to the application site and 2.4 metres back from the nearside edge of the adjoining carriageway (measured perpendicularly) for a distance of 50 metres west and 48.5 metres east along the nearside edge of the adjoining carriageway. Nothing shall be planted, erected and/or allowed to grow on the triangular area of land so formed which would obstruct the visibility described above.  
  
Reason: In the interests of highway safety and to conform to the requirements of Policy MT1 of Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework.



(xi)



OS MasterMap 1250/2500/10000 scale  
19 January 2017, ID: HMC-00592242  
[www.themapcentre.com](http://www.themapcentre.com)

1:1250 scale print at A4, Centre: 367666 E, 225522 N

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## Appendix 5

# PLANNING PERMISSION

**Applicant:**

Mr & Mrs Poynor  
Royal Cottage  
Gorsley  
Ross-On-Wye  
HR9 7SH

**Agent:**

Mr David Kirk  
HDP Architecture  
100 Chase Road  
Ross-On-Wye  
Herefordshire  
HR9 5JH

---

Date of Application: 22 October 2019

Application No: 193633

Grid Ref:367866:225591

---

**Proposed development:**

**SITE:** Royal Cottage, Linton Road, Gorsley, Herefordshire, HR9 7SH  
**DESCRIPTION:** Proposed residential dwelling

---

THE COUNTY OF HEREFORDSHIRE DISTRICT COUNCIL hereby gives notice in pursuance of the provisions of the above Acts that PLANNING PERMISSION has been GRANTED for the development described above in accordance with the application and plans submitted to the authority subject to the following conditions:

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: Required to be imposed by Section 91 of the Town and Country Planning Act 1990.

- 2 The development hereby approved shall be carried out strictly in accordance with the approved plans (drawing nos. 187-PL01 and PL02 Rev B) and the schedule of materials indicated thereon.

Reason: To ensure adherence to the approved plans and to protect the general character and amenities of the area in accordance with the requirements of Policy SD1 of the Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework.

- 3 With the exception of any site clearance and groundwork, no further development shall take place until details or samples of materials to be used externally on walls and roofs have been submitted to and approved in writing by the local planning authority. Development shall be carried out in accordance with the approved details.

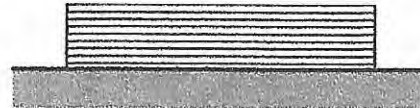
Reason: To ensure that the materials harmonise with the surroundings so as to ensure that the development complies with the requirements of Policy SD1 of the Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework.



Natural Oak posts

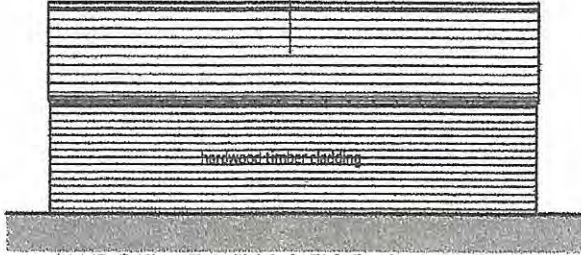


EAST ELEVATION

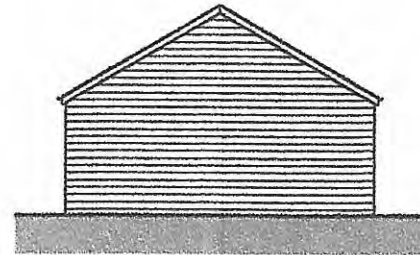


NORTH ELEVATION

Slate roofing - to match dwelling

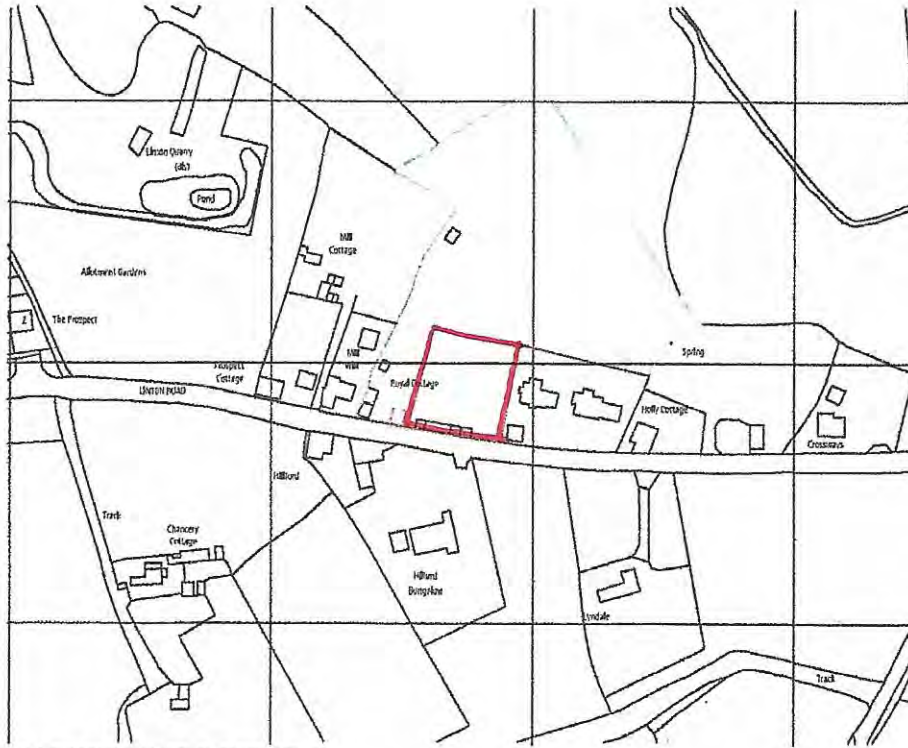


WEST ELEVATION



SOUTH ELEVATION

Y  
AGE



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SITE LOCATION PLAN 1:2000

# HDP

HEREFORDSHIRE DESIGN PARTNERSHIP

client  
MR & MRS M POYNOR  
project  
SITE ADJACENT ROYAL COTTAGE  
LINTON RD GORSLEY HR9 7SH  
drawing  
PROPOSED SITES

date  
02/10/2019  
scale  
1:250 @ A1  
drawing no.

187-PL02 revB

100 Chase Road  
Ross-on-Wye  
Herefordshire  
HR9 5JH

t. 07966 685297  
e. info@hdparchitecture.co.uk  
w. www.hdparchitecture.co.uk

## PLANNING PERMISSION

**Applicant:**

Mr & Mrs M Poynor  
Royal Cottage  
Gorsley  
Ross-On-Wye  
HR9 7SH

**Agent:**

Mr David Kirk  
HDP Architecture  
100 Chase Road  
Ross-On-Wye  
Herefordshire  
HR9 5JH

---

Date of Application: 21 July 2017

Application No:  
172713

Grid Ref:367914:225585

---

**Proposed development:**

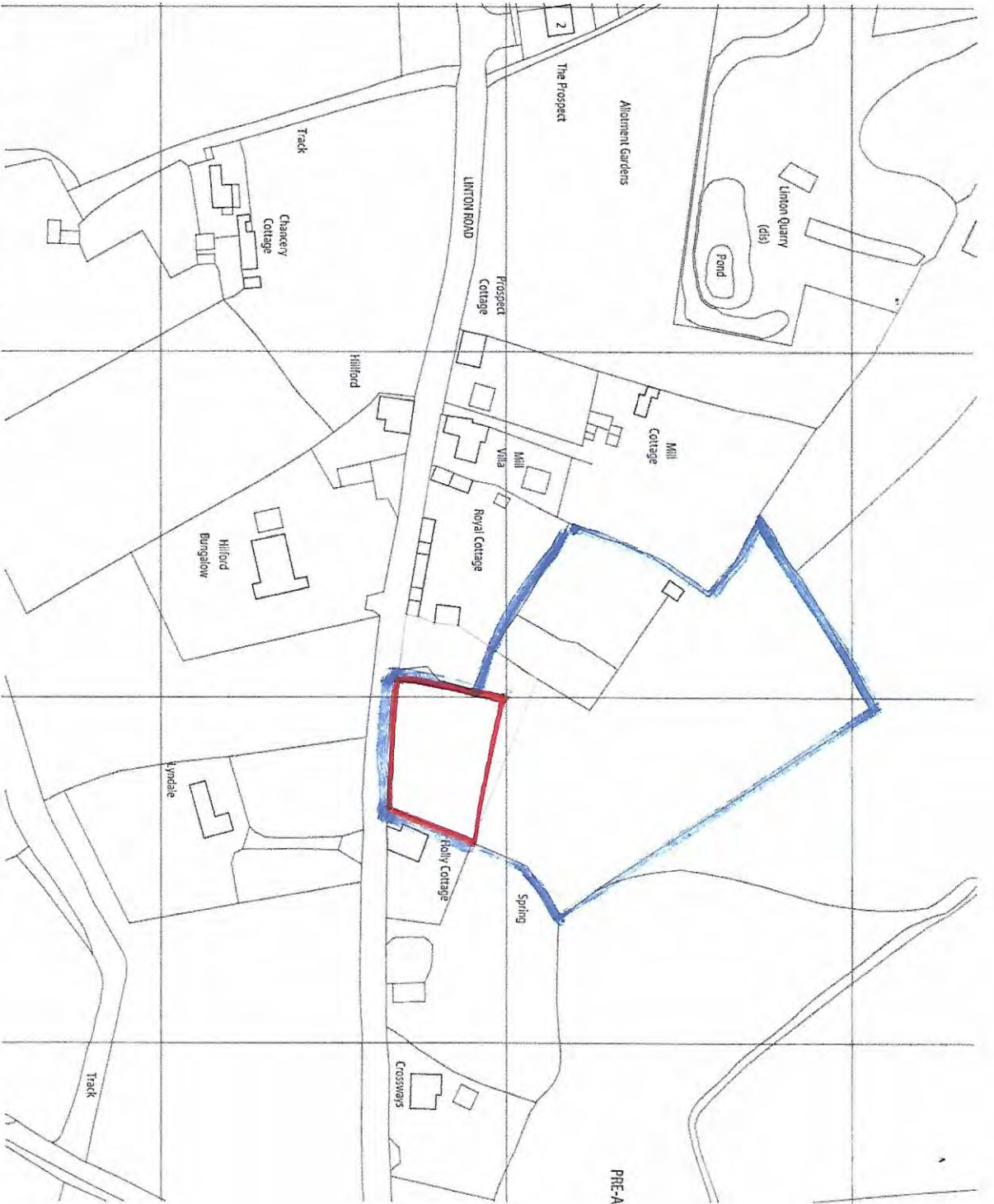
**SITE:** Site adjacent to Royal Cottage, Gorsley, Ross on Wye, Herefordshire, HR9 7SH  
**DESCRIPTION:** Proposed two new dwellings

---

THE COUNTY OF HEREFORDSHIRE DISTRICT COUNCIL hereby gives notice in pursuance of the provisions of the above Acts that PLANNING PERMISSION has been GRANTED for the development described above in accordance with the application and plans submitted to the authority subject to the following conditions:

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.  
  
Reason: Required to be imposed by Section 91 of the Town and Country Planning Act 1990.
- 2 The development hereby approved shall be carried out strictly in accordance with the approved plans received 14 September 2017 and the schedule of materials indicated thereon and site location plan, hedgerow planting, ecological appraisal and Design and Access Statement, all received 20 July 2017 unless further conditions of this Decision Notice dictate otherwise.  
  
Reason: To ensure adherence to the approved plans and to protect the general character and amenities of the area in accordance with the requirements of Policy SD1 of the Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework.
- 3 The ecological protection, mitigation and working methods scheme as recommended in the Ecological Report by Janet Lomas dated May 2017 shall be implemented in full as stated unless otherwise approved in writing by the local planning authority.  
  
Reason: To ensure that all species are protected and habitats enhanced having regard to the Wildlife and Countryside Act 1981 (as amended), the Conservation (Natural Habitats, &c) Regulations 1994 (as amended) and Policy LD2 of the Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework, NERC 2006.





PRE-APP ADVICE FOR 1-4 NEW RESIDENTIAL DWELLINGS

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**SITE LOCATION PLAN 1:1250**

revision notes

All dimensions must be checked on site and  
 for use in precise agreed location only  
 drawing remains copyright of the author

client  
**MR & MRS M POYNOR**  
 project  
**SITE ADJACENT ROYAL COTTAGE**  
 LINTON RD GORSLEY HN9 7SH  
 drawing  
**SITE PLAN**

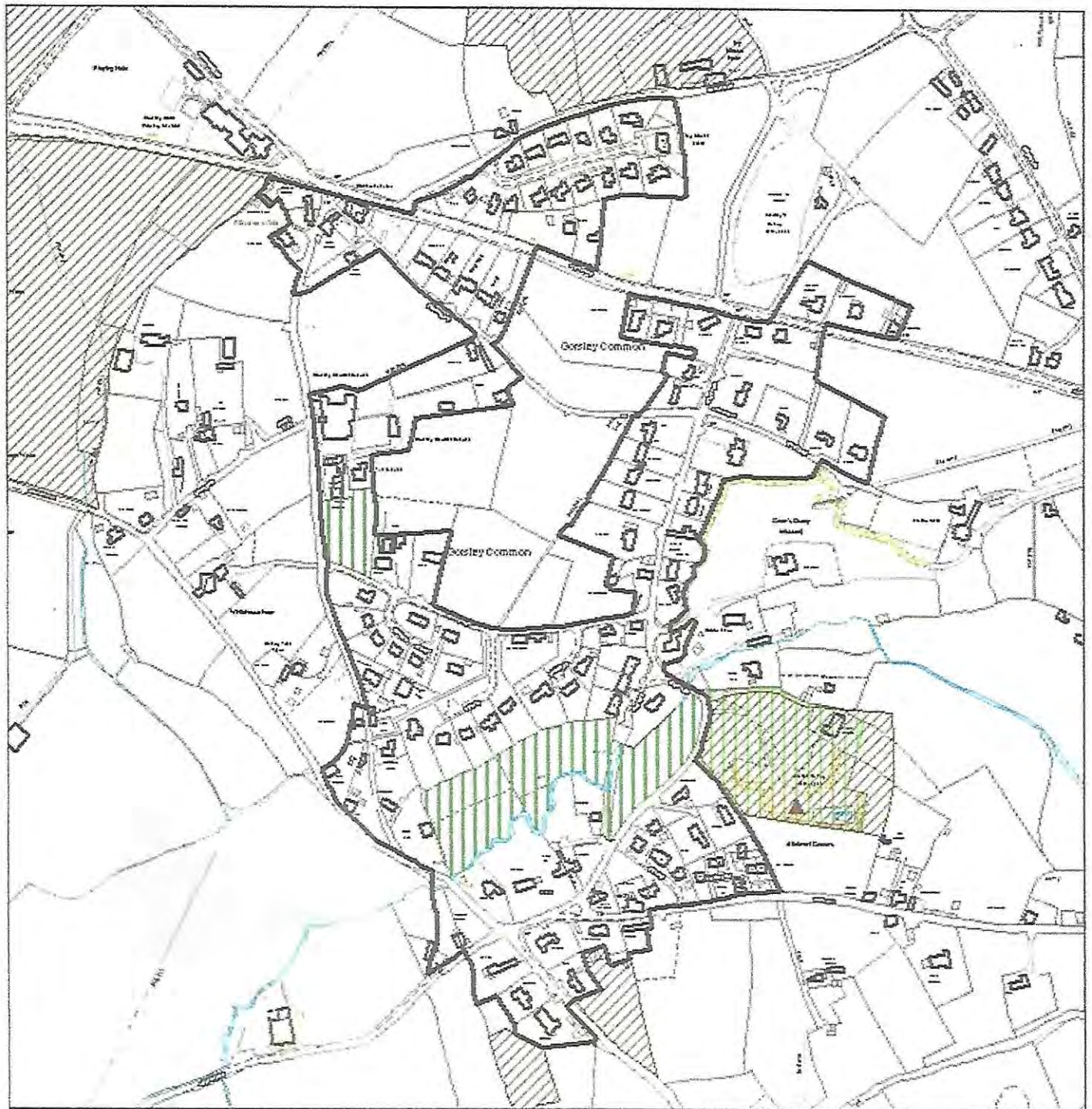
date  
**25/10/2016**  
 scale  
**1:1250**  
 drawing no.  
**682-PL01**  
 rev



**HDP**  
 HEREFORDSHIRE DESIGN PARTNERSHIP

100 Castle Road  
 Ross-on-Wye  
 Herefordshire  
 HR9 5HJ  
 t: 01565 66237  
 e: info@hdp-architecture.co.uk  
 w: www.hdp-architecture.co.uk

## Appendix 6





-  Settlement Boundary (H4)
-  Site of Special Scientific Interest (SSSI) (NC3)
-  Special Wildlife Site (SWS), Site of Interest for Nature Conservation, Section 39. (NC4)
-  Regionally Important Geological Site (Rigs) (NC4)
-  Protection of Open Areas and Green Spaces (HBA9)

## Inset Map 19a

# Gorsley



Herefordshire Unitary  
Development Plan

March 2007

The Written Statement contains general policies relating to the area covered by this map

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North Scale 1:5000

**Representations on Regulation 16 Bromsash, Gorsley and Linton  
Neighbourhood Development Plan 2011 - 2031  
on behalf of Mr. and Mrs. Newton, ADDRESS REDACTED**

Please see below the representations of Mr. and Mrs. Newton (“the Correspondents”) on the Regulation 16 Submission Draft Neighbourhood Development Plan (NDP) dated March 2020. These representations refer to the Correspondent’s rear garden to their home, ADDRESS REDACTED.

Basic Conditions

The ‘Basic Conditions’ that all NDPs must meet are as follows:

- NDPs are to have regard to national policy;
  - NDPs must contribute to sustainable development;
  - NDPs must be in general conformity with policies in the development plan;
- and
- NDPs must be compatible with EU obligations.

The Correspondent has the following representations to make on the Submission version of the NDP.

Overall Comment

The Government has recently announced that it will undertake a prompt and most significant overhaul of the planning system since its inception in 1947.

Until the details of this overhaul are known, it is not possible to conclude that the draft NDP will fulfil the basic conditions of having regard to national policy or whether or not it will contribute to sustainable development as defined in revised NPPF.

Therefore, the draft NDP should not progress to a referendum or towards it being 'made' until the outcome of the Government's overhaul of the planning system is known and whether the draft NDP needs to be reviewed to ensure it accords with national policy.

### Section 3: Vision and Objectives (page 9)

1. (paragraph 3.3): under Objective 2, there is a need to add the central Government objective to "significantly boost" the supply of new housing under paragraph 59 of the NPPF under the plan making process. Without the inclusion of this Government objective, the NDP would fail to pay sufficient regard to national policy and would fall short of reasonable expectations of the NDP.

### Section 4: Environment (page 11)

2. Paragraph 4.3): the following should be added to the last sentence:  
"...and the planting of new trees and hedges should be encouraged and considered a benefit in any development proposal".

### Section 5: Housing (page 23)

3. (paragraph 5.4): The NDP recognises that the Core Strategy requires housing growth in the identified settlements is proportionate to the community and its needs. However, there is no recognition that the percentage increase of proportionate growth of Bromsash, Gorsley and Linton (14%) is a minimum figure and not a ceiling. Given this, the NDP should recognise and reflect that Gorsley is one of the most sustainable settlements in the Ross Housing Market Area justifying it hosting much more housing than the minima figure of 14% growth. Based upon the Council Rural Housing Background Paper 2013 – part of the evidence of Core Strategy Policies RA1 and RA2 - Gorsley is the sixth most sustainable rural

settlement in the Ross-on-Wye Housing Market Area only one of which lies to the east of Ross-on- Wye (see **Appendix 1**).

4. In this respect, the NDP would be contrary to Core Strategy Policies RA1 and RA2 which identify Gorsley as a main focus for development in the area. Nor is there any recognition in the NDP, nor is it driven, by the need for it to “significantly boost” new housing in accordance with paragraph 59 of the NPPF. It adopts a policy of restraint upon future development for the next 11 years at odds with its strategic role in the Core Strategy spatial strategy.

5. NDP seeks to severely limit new development in Bromsash and Linton which might be justified by virtue of their relative unsustainability. However, this makes it even less appropriate for a similar approach to be adopted in Gorsley which is by far the most sustainable settlement in the NDP area.

6. For these reasons, the NDP promotes less development in Gorsley than is envisaged in the strategic policies for the area contained in the Core Strategy contrary to paragraphs 29 and 59 of the NPPF. Therefore, the NDP does not fulfil two of the ‘Basic Conditions’ that it accords with the Core Strategy and national planning policy.

7. Table 1 on page 23 is based upon these unjustified premises. It underestimates the level of further growth that should occur at Gorsley if it is to achieve the objective of the Core Strategy of making Gorsley a main focus for development. This has implications for the draft settlement boundary of the NDP (see below). This also points to the need for the NDP to include allocations of land for further housing and not to rely upon the Settlement Boundary to provide windfall housing sites.

8. The inadequate provision for future growth is clearly demonstrated having regard to the NPPF. Herefordshire Council has not been able to demonstrate a five year of deliverable housing land since the adoption of the Herefordshire Core Strategy in October 2015. Since then, its shortfall in housing supply has been persistent, grown to the point that as of April 2019 it is substantial. As of this date,

the residual shortfall is approximately 1700 dwellings (**Appendix 2**). In all likelihood, this shortfall will continue for a further 12 months or more. The implications of this, is that the NDP will be 'out of date' carrying less than full weight even after it has been made. Moreover, the omission of housing allocations in the NDP will result in paragraph 14 of the NPPF not being engaged. Consequently, the 'tilted balance' of paragraph 11 of the NPPF will continue to be engaged in the medium-term for Gorsley housing proposals in the absence of housing allocations. This demonstrates the unsoundness of the NDP in this respect.

#### Settlement Boundaries (page 24)

9. (paragraph 5.6): the draft boundaries are described as showing the *“planned extent of the main built-up form for each village and generally follow physical features, principally curtilages marked by fence or hedgerows. They have been prepared having regard to criteria in Herefordshire Council guidance”*. This 'guidance' refers to the Council's Guidance Note 20; Guide to Settlement Boundaries (June 2015).

10. The NDP aims to restrict new housing development by the application of a strict settlement boundary rather than rely upon housing allocations.

11. The Correspondent's objection to this aspect of the NDP area as follows:

(i) That the NDP fails to adhere to its own objective of defining the draft settlement boundary in accordance with the Council's 2015 guidance on settlement boundaries; and

(ii) That failure to adhere to the Council's 2015 guidance would provide insufficient scope for 'windfall' schemes to significantly boost the supply of housing in the sustainable rural settlement of Gorsley.

## Proposed Exclusion of ADDRESS REDACTED from the Settlement Boundary

12. The draft settlement boundary unjustifiably excludes the southernmost part of the village. These areas include several residential properties which adjoin the draft Settlement Boundary.

13. The Settlement Boundary should include ADDRESS REDACTED (see **Appendix 3**).

14. It is the stated objective of the NDP to exercise the Council's 2015 *Guide to settlement boundaries* when defining the Gorsley settlement boundary (see paragraph 5.6, page 24). Under the heading 'Criteria used to define the extent of the settlement boundaries' the guidance advocates the inclusion within settlement boundaries the following:

- (i) "Physical features – *wherever* possible try to allow the boundaries to follow physical features, such as buildings, field boundaries or curtilages.... "
- (ii) "Planning History – you may wish to consider existing commenced planning permissions....."
- (iii) "Village enhancements – Settlement boundaries *should* include buildings and associated land that make up the village form...."
- (iv) "Recent development – Where appropriate, settlement boundaries should include new development which may have occurred recently. It is also *advisable* to include sites that have received planning permission within the settlement boundary..."
- (v) "Important amenity areas – These form part of the character of the settlement and could be identified and protected by policy and included in the settlement boundary due to the contribution to built form."
- (vi) "Your settlement boundary *should* be drawn to facilitate an appropriate level of proportional growth within the plan period. If land within the boundary is not formally allocated, there will be a requirement to demonstrate that there is enough available capacity within the boundary to enable development to take place."

15. The draft settlement boundary and its exclusion of ADDRESS REDACTED does not adhere to the Council guidance for the following reasons. It does not adhere to guidance principles (i), (ii), (iii) and (vi).



16. ADDRESS REDACTED

Specifically, in relation to ADDRESS REDACTED the relevant criteria of NDP Guidance Note 20 are as follows:

- *Lines of communication* – ADDRESS REDACTED lies west of Sargent’s Lane which is one of the village radial roads. Applying this criterion supports the assertion that ADDRESS REDACTED should be included within the settlement boundary.
- *Physical features* defined by buildings, field boundary and curtilages: ADDRESS REDACTED abuts the draft settlement boundary to the south. It is acknowledged that the guidelines does permit the exclusion of large gardens under certain circumstances to “limit expansion”. However, where there is a need to provide more houses than is proposed in the NDP (as is the case) it is not justified to exclude the whole of ADDRESS REDACTED from the settlement boundary.
- *Planning history* – Not applicable
- *Village enhancements* – Not applicable.
- *Recent development* – Not applicable
- *Important amenity areas* – Not applicable.

17. ADDRESS REDACTED meets all the criteria of the Council’s Guidance Note 20 relevant to this property. Consequently, in accordance with its relevant objective criteria and the reasons given above, the Correspondent’s property and adjoining residential areas (**Appendix 3**) should be incorporated within the draft settlement boundary.

## Settlement Boundary Would Provide an Insufficient Supply of Housing Growth

18 The purpose of plan-making is to review and test development plan objectives and assumptions and the extent over which those policies are to be applied. Since 2007, Gorsley has been required to act as a main focus of development in the area, development plans must significantly boost new housing and the lack of a five year supply of housing sites renders planning policy 'out of date'. These additional responsibilities on planning authorities justifies the enlargement of the previous Gorsley settlement boundary to meet the additional need for more housing of sufficient numbers to meet these requirements.

19 The Herefordshire Council's 'Rural Housing Background Paper' dated March 2013 formed part of the evidence base for the Core Strategy. It framed Core Strategy Policies RA1 and RA2 which supports new housing at Gorsley. It follows, therefore, that the draft NDP should adhere to Policy RA1 and RA2 as the Council intended them to be applied as expressed in, amongst other documents, the Rural Housing Background Paper 2013 (see **Appendix 1**).

20 The Background Paper identified that 184 dwellings existed within the 'main village envelope' (see page 37). The number of houses provided in 2013 is the base for the proportionate level of growth of housing in the village and would have included the approximately 20 dwellings along Linton Road. It is therefore, highly inconsistent for the draft NDP settlement boundary to exclude this appreciable collection of houses which is contiguous with the remainder of the village, when the evidence base for strategic policies RA1 and RA2 included them. The clear implication of this is that the draft settlement would result in less development than was envisaged under strategic policies thus not meeting one of the Basic Conditions.

21 The proposed tightly-drawn settlement boundary is unlikely to generate sufficient numbers of new houses to ensure the delivery of the quantum of new housing in Gorsley commensurate with its sustainability credentials. The premise of the NDP that the minimum level of proportionate growth for Gorsley has been exceeded as a basis for ensuring it fulfils its role as a focus for rural development up to 2031 is unfounded.

22. The draft Settlement Boundary adheres closely the previous Settlement Boundary of the Herefordshire Unitary Development Plan which was the development plan between 2007 and 2015 (**Appendix 4**). It is therefore unrealistic for the NDP to adequately provide for housing growth up to 2031 by relying upon essentially the same Settlement Boundary adopted in a previous development plan up to 2015.

23. This demonstrates a need to enlarge the Settlement Boundary to include more village properties including ADDRESS REDACTED and/or to make housing allocations. Otherwise, the NDP will not accord with national policy to significantly boost the supply of housing or contribute to sustainable development.

#### Housing Mix (page 29)

24 The Correspondents support the broad principle of requiring new housing to contribute to a reasonable mix of housing sizes in accordance with local housing needs under draft Policy BGL7 (page 31). However, it should be recognised that on some sites, this objective would entail a higher density of development to ensure the viability and delivery of potential housing sites and to better ensure that smaller houses are retained in the long term as such. Not to permit higher density of development in these circumstances would not make an effective use of land in accordance with paragraphs 8 and 117 of the NPPF.

#### Section 8: Delivering the Neighbourhood Development Plan (page 38)

25 The Correspondents consider that it should be clarified in this section that the NDP once 'made' should be applied in accordance with Section 38(6) of the Planning Act. Further, it should be made clear that when relevant, the NDP may have to be reviewed. This is due to a likely change in material considerations over time. Further, the NDP will be 'out of date' should there continue to be a shortfall in the supply of deliverable housing sites the county under paragraph 11 of the NPPF.

Paul Smith Associates  
July 2020

## Appendix 1

**ROSS**  
**Rural HMA Housing Target**  
**1150**

	Approximate number of residential dwellings within the main village envelope	Strategic Housing Land Availability Assessment	Affordable Housing Needs Survey	Public transport provision	Pub / Restaurant	Village Hall	Primary School	Shop	Post office	Existing employment site (within 5km)	Additional Key Services	Floodzone 3	AONB	Hierarchy matrix total points
Liancloudy	21			3										5
Didley	21		6	3										4
Brockhampton	22		2	1		3							✓	10
Thrupton	24		15 <sup>1</sup>	3										6
Rushall	26			0										3
Orcop	27		6 <sup>2</sup>	3		3						✓		9
Three Ashes	27			0										2
Aconbury	29		1	3										6
St Weonards	30			3		3	3	3	3					21
Lianwarne	30		7	3		3						✓		10
Allensmore	33		7 <sup>3</sup>	3		3				2		✓		11
Kerne Bridge	33		12 <sup>4</sup>	3								✓	✓	4
Broad Oak	37		11 <sup>5</sup>	3			3	3						11
Harewood End	37		0	3										8
Much Birch/ The Axe & Cleaver	38			3										10
St Owens Cross	38		6 <sup>6</sup>	3										9
Kilpeck	39		1	3		3			3					13
Aston Ingham	39		2	1		3								13
Upton Crews	40		6 <sup>7</sup>	0										2
Symonds Yat (West)	46		11 <sup>8</sup>	3		3				1	1			13
Bishopwood	47		12 <sup>4</sup>	0		3		3						10
Welsh Newton Common	48			1		3		3	3					17
Liangarron	48			1		3								10
Glewstone	51		0	1									✓	3
Cobhall Common	53		7 <sup>3</sup>	3										4
Howle Hill	55		12 <sup>4</sup>	3										5
Winnal	56	5	7 <sup>3</sup>	3		3	3	3	3	2				18
Wormbridge	58		2	3			3	3						13
Orcop Hill	61		6 <sup>2</sup>	1		3								5
Pontrilas	66	6	4	3		3		3	3	2		✓		21
Woolhope	67	127	4	3		3		3	3				✓	17





## Appendix 2



**1. Introduction**

- 1.1 This Statement sets out an assessment of the housing land supply position in Herefordshire taking into account the requirements of the National Planning Policy Framework (NPPF) at 1<sup>st</sup> April 2019.
- 1.2 With the government aim of achieving faster delivery of new homes, a reviewed approach to the five year supply has been set. The context to the updated Framework, as has been repeatedly cited by Government, is to address the severe issues of housing undersupply and affordability prevalent across the country. It is of no surprise therefore that the most substantial policy changes relate to the delivery of housing and the more effective use of land. It is about ensuring homes are actually built.
- 1.3 The approach to engagement on this supply paper is set explained at the relevant sections within this document.

**2.0 Planning Policy****National Planning Policy Framework**

- 2.1 The NPPF 2019 indicates that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years supply of housing against their housing requirements set out in adopted strategic policies or against the local housing need where the strategic policies are more than five years old (paragraph 73). The supply of specific deliverable sites should in addition include a buffer:
- 5% to ensure choice and competition in the market for land; or
  - 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
  - 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply<sup>1</sup>.

---

<sup>1</sup> (NPPF Footnote 39) From November 2018, this will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.

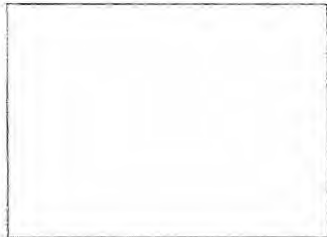
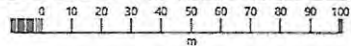
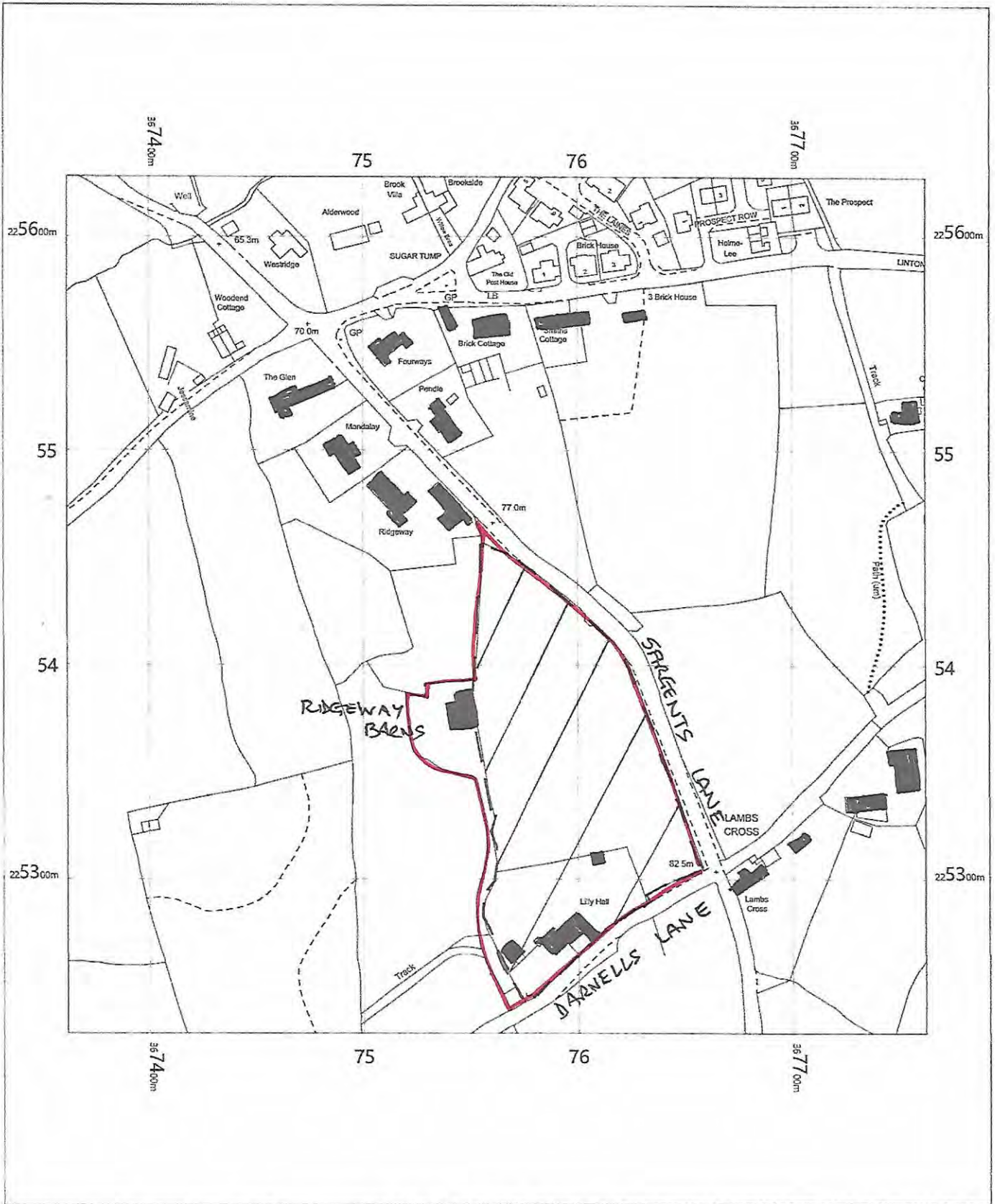


Figure 10. Assessment against Core Strategy stepped trajectory.

	Source	Homes	Notes
A	Core Strategy 2011 – 2031	16500	
B	Core Strategy requirement 1/4/2011 – 1/4/2019	5550	Using Trajectories: 600 dpa 2011-2016 (5yrs.) 850 dpa 2016-2019 (3 yrs.)
C	Homes Completed (net) 1/4/2011 – 31/3/2019 (past eight years)	3821	Net reduction includes demolitions and conversions
D	Requirement for next five years	4400	Using Trajectories 19/20– 20/21 – 850 pa (2 yrs) 21/22 – 23/24 900 pa (3 yrs)
E	Plus Residual Shortfall	1729	(over next five years as per NPPG)
F	Plus 20% buffer	1229	As recommended by Core Strategy Inspector and NPPF 2018
G	<b>Total Requirement</b>	<b>7358</b>	
H	<i>Annualised requirement</i>	1472	
I	<b>Total Deliverable dwellings</b>	5966	
J	<b>Housing Supply</b>	<b>4.05yrs</b>	I / H

## 5. Housing land supply for Herefordshire

- 5.1 When assessed against the Core Strategy, the current supply is 4.05 years. Before any discounting of sites was carried out this year's permission was 125 dwellings less than 2018. Changes to the NPPF has meant there is a need to be more rigorous with sites in terms of what is considered to be deliverable. Sites with permissions and allocations have been discounted where there is inactivity or lack of information on them coming forward through the planning process or being developed. This has affected the five year supply figure quite significantly and hence the drop from 2018 where the supply was 4.55yrs to 4.05yrs in 2019. This year's



OS MasterMap 1250/2500/10000 scale  
 Friday, November 22, 2019, ID: HMC-00843064  
 www.themapcentre.com

1:2500 scale print at A4, Centre: 367562 E, 225428 N

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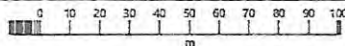
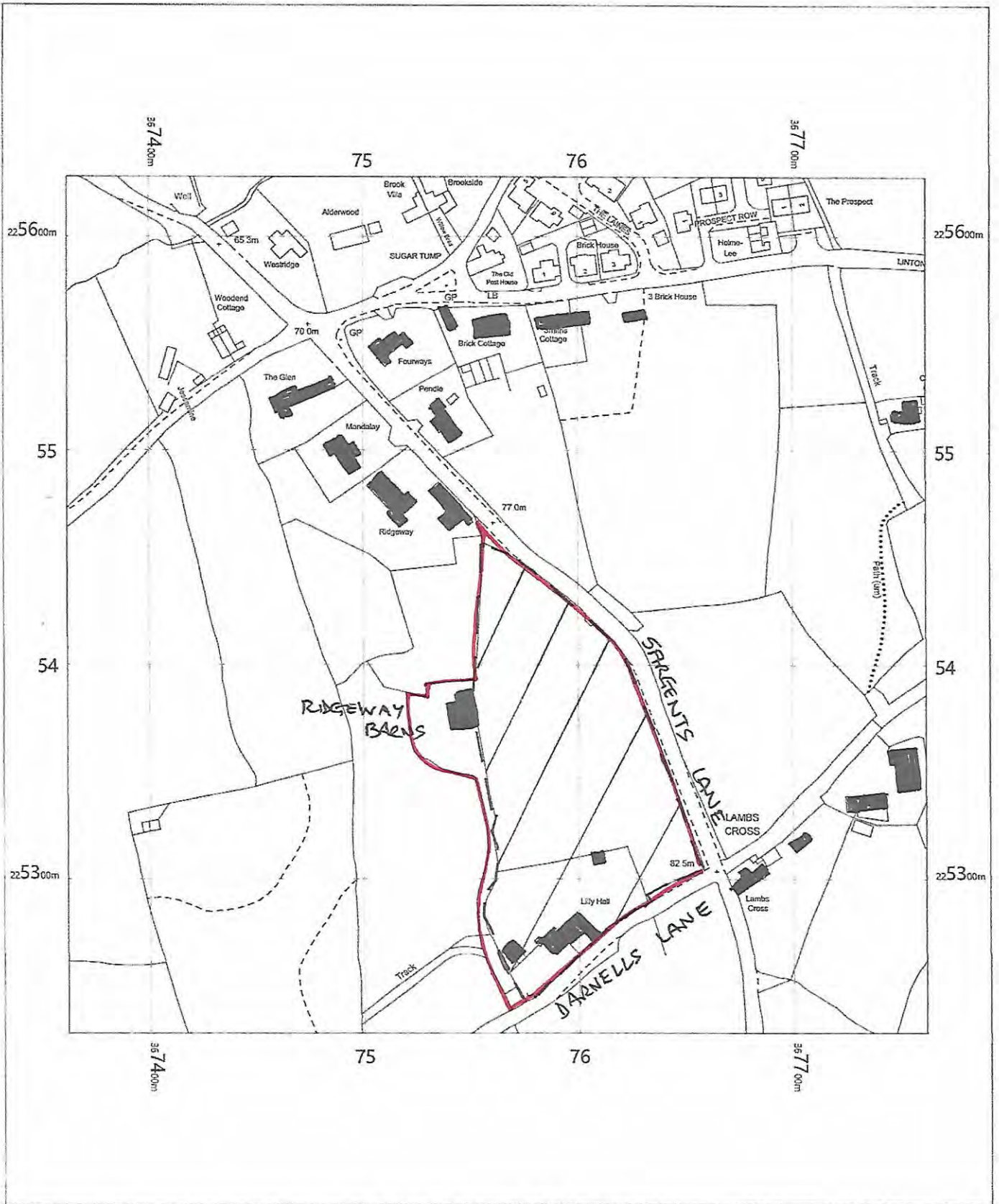


**THE MAP CENTRE**  
 www.themapcentre.com



## Appendix 3





OS MasterMap 1250/2500/10000 scale  
 Friday, November 22, 2019, ID: HMC-00843064  
[www.themapcentre.com](http://www.themapcentre.com)

1:2500 scale print at A4, Centre: 367562 E, 225428 N

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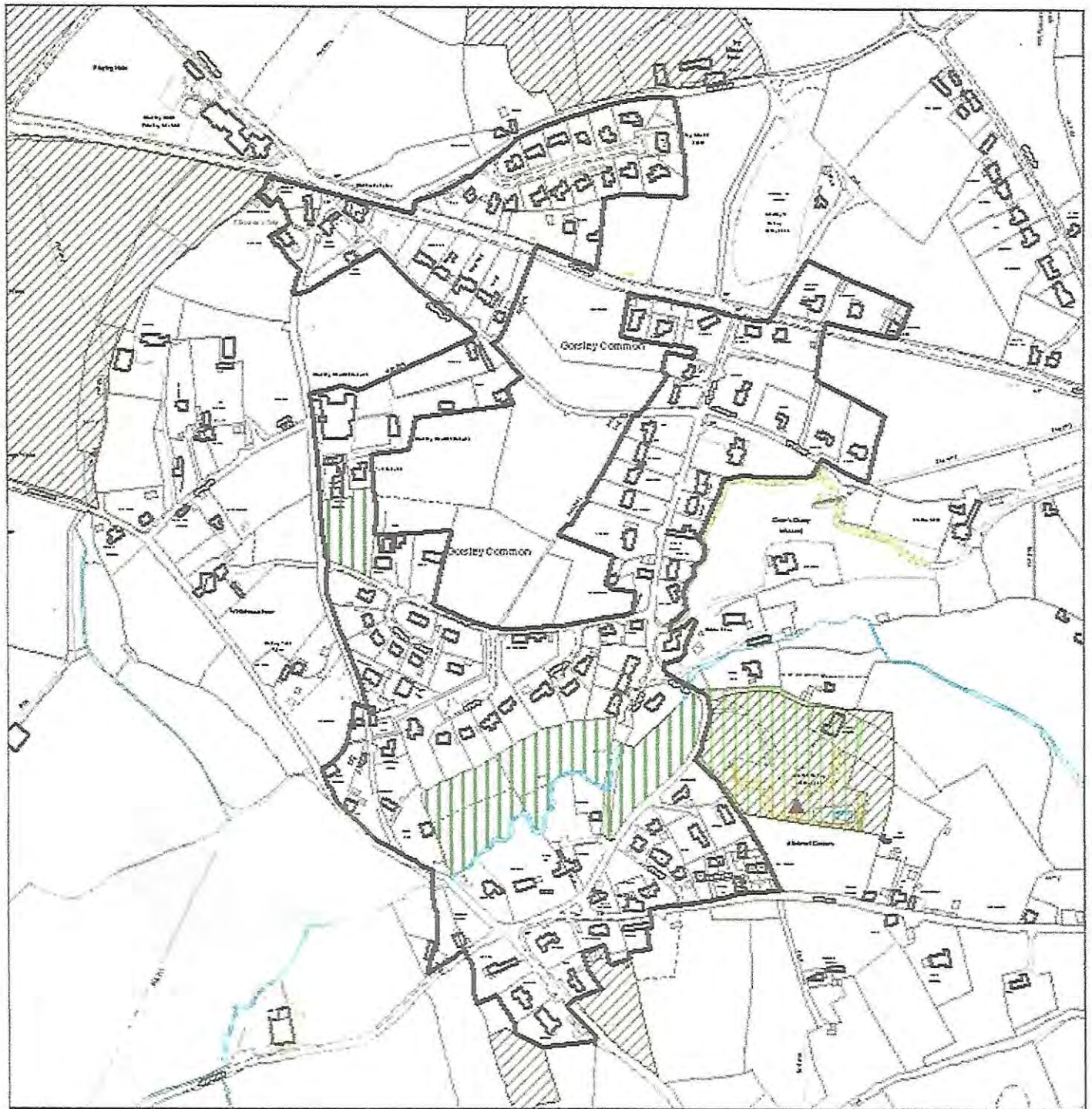




**THE MAP CENTRE**  
[www.themapcentre.com](http://www.themapcentre.com)



## Appendix 4





-  Settlement Boundary (H4)
-  Site of Special Scientific Interest (SSSI) (NC3)
-  Special Wildlife Site (SWS), Site of Interest for Nature Conservation, Section 39. (NC4)
-  Regionally Important Geological Site (Rigs) (NC4)
-  Protection of Open Areas and Green Spaces (HBA9)

## Inset Map 19a

# Gorsley



**Herefordshire Unitary  
Development Plan**

March 2007

The Written Statement contains general policies relating to the area covered by this map

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North  Scale 1:5000

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



**APPLICATION DETAILS**

306933 /  
Linton (S) Parish  
Susannah Burrage, Environmental Health Officer

I have received the above application on which I would be grateful for your advice.

The application form and plans for the above development can be viewed on the Internet within 5-7 working days using the following link: <http://www.herefordshire.gov.uk>

I would be grateful for your advice in respect of the following specific matters: -

	Air Quality		Minerals and Waste
	Contaminated Land		Petroleum/Explosives
	Landfill		Gypsies and Travellers
	Noise		Lighting
	Other nuisances		Anti Social Behaviour
	Licensing Issues		Water Supply
	Industrial Pollution		Foul Drainage
	Refuse		

Please can you respond by ..

**Comments**

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

From this point of view we have no objections to the proposed policies nor housing settlement sites as contained in the Linton draft neighbourhood plan (Regulation 16 stage).

Signed: Susannah Burrage  
Date: 28 May 2020

**Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment**

From Herefordshire Council Strategic Planning Team

Name of NDP: Linton Parish- Regulation 16 submission draft

Date: 28/05/20

<b>Draft Neighbourhood plan policy</b>	<b>Equivalent CS policy(ies) (if appropriate)</b>	<b>In general conformity (Y/N)</b>	<b>Comments</b>
BGL1- Sustainable Development	SS1; SS2; SS4; SS5; SS6	Y	
BGL2- Natural Environment	SS6; LD1; LD2; LD3; SD3; SD4	Y	
BGL3- Historic Environment	SS6; LD4	Y	
BGL4- Building Design	SS4; SS6; SS7; MT1; OS1; OS2; LD3; SD1	Y	
BGL5- Renewable and Low Carbon Energy	SS7; SD2	Y	
BGL6- Settlement Boundary	SS2; RA2	Y	
BGL7- Housing Mix	SS2; H3	Y	
BGL8- Community Services and Facilities	SS1; SC1	Y	
BGL9- Local Green Space	SS6; OS3	Y	
BGL10- Small-scale Employment Development	SS5; RA6; E1; E2; E3	Y	
BGL11- Agricultural Development	SS5; RA6	Y	

**Other comments:**

Nothing further to add- plan in general conformity with CS.



28 May 2020

Our ref: Linton 2

Dear Sir/Madam

## Linton Parish Neighbourhood Development Plan 2011-2031 Consultation Draft

Thank you for giving Severn Trent the opportunity to comment on your consultation. Severn Trent provide sewerage services to the village of Gorsley, whilst Linton and Bromsash are just on the edge of our service area. We have the following specific comments relating to your Neighbourhood Plan. Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice

**Policy BGL2: Natural Environment** – We are supportive of your policy, especially section 5 ‘promoting conservation, restoration and enhancement of all sites and features ... including hedgerows, ponds and watercourses.’

The retention of watercourses, ditches and land drainage are essential to facilitate sustainable drainage of surface water for new development and for future generations. It is recommended that watercourses are retained within open space to enable access for maintenance, preventing encroachment and improved biodiversity.

**Policy BGL4: Building Design** – We are particularly supportive of your policy points 2 and 3.

To further point 2 we encourage you to include a statement about water efficiency. We are supportive of the use of water efficient fittings and appliances within new properties, we encourage of the optional higher water efficiency target of 110 Litres per person per day within part G of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction to deliver water efficiency.

We would encourage you to include the following statement in your policy:

*‘Development proposals should demonstrate that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day. All developments should demonstrate that they are water efficient, where possible incorporating innovative water efficiency and water re-use measures’*

To further point 3 we would encourage you to include a policy which states new developments incorporate Sustainable Drainage Systems (SuDS) in their designs. This provides an opportunity to



deliver benefits to water quantity, water quality, amenity and biodiversity which supports your policy points 3. We would therefore encourage you to include the following statement in your policy:

*'All developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are put in place unless demonstrated to be inappropriate. All schemes for the inclusions of SuDS should demonstrate they have considered all four aspects of good SuDS design, Quantity, Quality, Amenity and Biodiversity, and the SuDS and development will fit into the existing landscape'*

We hope these comments are useful to you. For your information we have set out some general guidelines that may be useful to you.

### **Position Statement**

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

### **Sewage Strategy**

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

### **Surface Water and Sewer Flooding**

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

## Water Quality

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

## Water Supply

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

## Water Efficiency

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres or less.
- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

Yours sincerely

Rebecca McLean

Strategic Catchment Planner

[growth.development@severntrent.co.uk](mailto:growth.development@severntrent.co.uk)



## Latham, James

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**From:** Hammond, Victoria  
**Sent:** 08 July 2020 14:23  
**To:** Neighbourhood Planning Team  
**Subject:** RE: Linton Regulation 16 submission neighbourhood development plan consultation

Dear NPT,

Please find below comments from transportation on the Linton Regulation 16 NDP:

Development control comments:

1. Speed and Volume surveys - full 7 days are required with new accesses.
  - a. Access visibility splays need to be assessed against Manual for Streets 2 guidance.
2. They need to include Core Strategy policy SS4

Active travel comments:

- Objective 3 (p12): Infrastructure and roads declare to “support the provision of improved infrastructure in line with new development, including roads/pavements; public transport and the encouragement of active travel (walking and cycling).
- Building policy BGL1 (p13) seeks among the following objectives under 3. to supporting provision that encourages active travel; but could possibly be stronger in the light of objective 3.
- Under building design policy BGL4 (p24) refers to provision of “cycle storage and onsite pedestrian and cycle access” (para 2 & 4), and “wherever practicable include provisions for pedestrians and cyclists to encourage active travel, and for powered disability vehicles;” (para 5). Would have liked to see preferences for developments that also provide off-site infrastructure, for example, to serve active travel access to the Gorsley school building on the toucan crossing over the busy B4221.
- BGL10 (p39) Small-scale employment development, could also explicitly refer to BGL4 in the policy rather than in the preamble (para 7.5).
- Rather than policies, transport issues are picked up in the list of Community Actions (Table 3, p42): only CA6 refers to walking and cycling and then about talking with landowners (why not developers too?). Although CA1 refers to “all road users” it seems to focus on speed limits, weight and parking restrictions and footways.

Many thanks,  
Vicky

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**From:** Neighbourhood Planning Team <neighbourhoodplanning@herefordshire.gov.uk>  
**Sent:** 27 May 2020 10:30  
**Subject:** Linton Regulation 16 submission neighbourhood development plan consultation

Dear Consultee,

Linton Parish Council have submitted their Regulation 16 Neighbourhood Development Plan (NDP) to Herefordshire Council for consultation.