

## Latham, James

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**From:**  
**Sent:** 09 November 2020 11:18  
**To:** Neighbourhood Planning Team  
**Subject:** NDP Tarrington response from AKS Bush  
**Attachments:** NDP Reg 16 Response Novemebr 2020.docx; Tarrington-Housing-Site-Assessment-April-2018- - Copy.pdf

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Dear Mr Gabb/NDP team

Land at School Road

(Declaration of Interest: Anthony Bush lives at REDACTED.)

Please find attached a response to a particular issue I have with the Draft 2020 Tarrington NDP. Please note that this response identifies a significant flaw in the NDP document in that an area of 0.65 hectares is recommended (Land on School Road) for development. No evidence for this area is presented.

In contrast a smaller area of 0.44 hectares was identified in a report issued by the parish council in 2018 that is supported by much evidence which was collected by a number of agencies including Herefordshire Council. I believe the NDP should be built on evidence and that this area, 0.65ha currently in the report should be changed in line with the evidence to 0.44 hectares.

With Kind Regards

Anthony Bush

Response from Anthony Bush, Resident. Address: REDACTED

Land off School Road Tarrington- Evidence supports reduction of site to 0.44 hectares.

The Settlement Boundary, in the 2020 Draft Plan, for the field off School Road Tarrington identifies an area of 0.65 hectares for development. This is in direct conflict with the parish council's own planning expert assessment carried out in 2018, "Tarrington Housing Site Assessment April 2018" (attached).

In section 3.3.12 of this paper the author writes: -

"The landscape implications of development have been the subject of a number of technical studies undertaken for the NDP and for the recent planning application, commissioned variously by the landowner, the NDP Steering Group and independently. The consensus of this body of work is that the focus for new development should be restricted to the south-east of the site.

The most recent commentary is provided by the Council's Landscape Officer in her consultation response on a planning application (*P171165/0 Delegated Officer report*) which was refused for the site and is quoted below. Note the reference to "Ms Tinkler's findings" is to the Landscape Assessment of the site undertaken for the NDP Steering Group in July 2016:

*" I concur with Ms Tinkler's findings that built form should be confined to the south east of the site and the extent to which this encroaches into the northern section of the field should be clearly identified in relation to the landform ... there is a natural stop at the narrow point of the field, which is more or less in line with the curtilage boundary to the west at The Vine. The northern section of the site should remain undeveloped, given the adjacent traditional orchard and the history of the site itself further orchard planting would be appropriate. An attenuation pond in the north east corner – the lowest point of the site - would appear logical and can offer potential enhancement. The creation of a pedestrian link to the village core via a footbridge is also an attractive proposition which would be beneficial to the community. ... I think there is a strong argument for retaining the western half of the site as undeveloped – this will reduce the adverse visual effects for users of PROW TR3 and will prevent coalescence. The available evidence provides a basis for addressing the concerns over landscape impact which have led in part to the recent refusal of planning application. As indicated above, the July 2016 Landscape Assessment also includes relevant proposals to foster sustainable transport choices, and so to address another reason for refusal."*

The Parish Council's Planning expert concludes in his 2018 report: - 3.3.23.

*"Taking all the above into account, land in the lower-lying, south-east part of the site extending to circa. 0.44 ha is suitable for development. This area is shown on Plan 3 (page 11) and is identified pursuant to the 2016 Landscape Assessment which indicates a potential capacity of around six dwellings. Development would be guided by a site allocation policy in the NDP, again principally informed by the 2016 Assessment and which would address and deliver the various considerations identified above."*

The latest Draft Plan 2020 gives no evidence why 0.65hectares has been allocated for housing in the plan. This area is 50% larger than the area of 0.44 hectares identified in the 2018 report, above. Carly Tinkler's reports note that there is a ridge running down the centre of the field west – east. It is important for all housing to be below this ridge in the far southeast of the field.

The 2020 document has totally ignored this vital fact and has enlarged the area by 50% to 0.65 hectares without any evidence for why this has been done and in direct conflict with Herefordshire Council planning department officials' recommendations in the planning application as above.

As these officials and three other landscape reports mention, this larger area will have serious deleterious effects on the landscape and heritage aspects of that area.

#### Recommendation

In this latest Reg 16 report this 0.65h area should be reduced to 0.44 hectares and the settlement boundary altered accordingly. It is also interesting to note that in his Site assessment report of 2018, the parish council's planning expert concludes: \_

*"Taking all the above into account, land in the lower-lying, south-east part of the site extending to circa. 0.44 ha is suitable for development.....and ... indicates a potential capacity of around six dwellings."*

In Summary **the evidence** supports a development of around 6 dwellings on an area of **0.44 hectares** in the far south eastern part of the field off School Road Tarrington. The Draft Plan 2020 should be changed to reflect the evidence presented!

# Tarrington Neighbourhood Development Plan

## Housing site assessment update April 2018

Dr DJ Nicholson  
DJN Planning Ltd

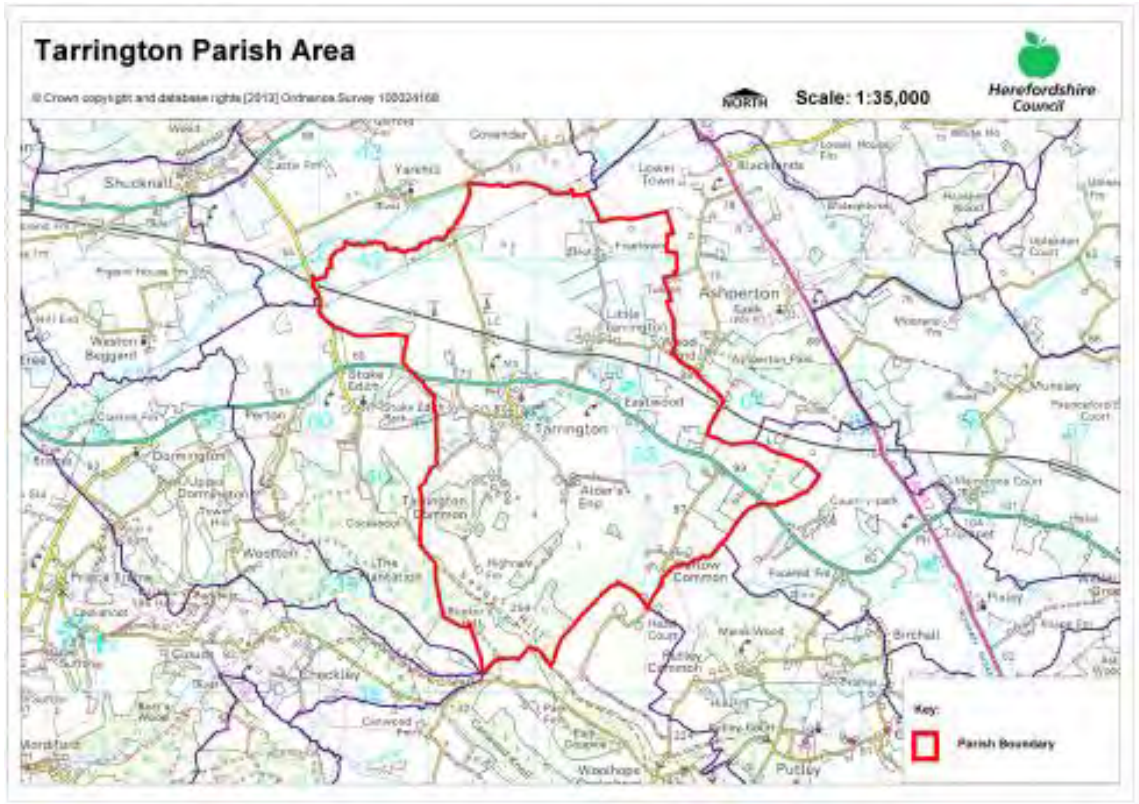
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### **1. Introduction**

- 1.1 This report provides an update of the Housing Site Assessment (HSA) undertaken by DJN Planning Ltd in December 2015 as part of the preparation of the Tarrington Neighbourhood Development Plan (NDP).
- 1.2 The 2015 HSA reviewed a total of 18 sites in and adjacent to Tarrington and Little Tarrington, with the aim of identifying land that was both suitable and available for housing for inclusion in the NDP. Sites were identified through a comprehensive site-search process informed by Herefordshire Council's Strategic Housing Land Availability Assessment (SHLAA), local knowledge, and a Call for Sites. Most of the sites were screened out due to lack of information as to their availability. The HSA went on to provide a detailed assessment of four sites, two of which have since been the subject of planning applications. The information provided and the decisions reached on these applications have superseded the conclusions and recommendations of the 2015 report, both in terms of the overall position regarding housing delivery and the site-specific assessments.
- 1.3 Tarrington Parish Council have decided to undertake a review and update of the recommendations and conclusions of the 2015 HSA, to take account of the recent planning decisions and to provide proportionate, relevant and up-to-date evidence for the allocation of land for housing in the NDP.
- 1.4 The Update:
  - Refreshes the position on housing delivery, in relation to the requirements of Herefordshire Council's Local Plan Core Strategy (section 2);
  - Provides revised assessments for each of the four sites reviewed in detail in the original HSA (section 3); and
  - Sets out conclusions and recommendations (section 4).
- 1.5 The Parish Council are intending to hold further public consultation on potential housing sites in May/June 2018. This report has been written as a supporting study to that exercise.

**2. The housing requirement**

2.1 The Local Plan Core Strategy requires that Tarrington delivers a minimum of 43 new homes in the period 2011-2031.<sup>1</sup> The majority of this growth is expected to be in or adjacent to the identified settlements of Tarrington and Little Tarrington, which lie adjacent but separate to each other in the centre of the Neighbourhood Area (Plan 1).



**Plan 1: Tarrington Neighbourhood Area**

Licence number: 100055375

2.2 Progress in meeting this requirement has been made through either the building of new dwellings (completions) or the granting of planning permission/Planning Committee resolution to approve (commitments). The position with regards to housing delivery as at 1 April 2018 is set out in Table 1.

| Number of new houses required to 2031 | Housing completions (net) 2011 2018 | Housing commitments (net) as at 1 April 2018 | Total housing remaining |
|---------------------------------------|-------------------------------------|--|-------------------------|
| 43                                    | 2                                   | 25   | 16                      |

**Table 1: Housing delivery, Tarrington Neighbourhood Area.**

<sup>1</sup> Herefordshire Local Plan Core Strategy, policies RA1 and RA2.

- 2.3 The commitment figure includes 15 dwellings and two live-work units on land between Garbrook and Little Tarrington Common Road. This scheme was the subject of a Herefordshire Council Planning Committee resolution to approve in November 2017. At the time of writing, a planning permission has not yet been issued pending completion of a s106 agreement. It is understood this is close to completion and that a planning permission will shortly be issued.
- 2.4 The 2015 HSA recommended that a “windfall”<sup>2</sup> allowance of 10 dwellings should be made as one component of housing supply. This recommendation took account of historic windfalls in the period 1996 to 2011 of 43 dwellings or 2.87 dwellings per annum. Since 2011 to 2018, 21 new dwellings (net) have gained planning permission or a Committee resolution to approve, equivalent to 3 dwellings per annum. These historic windfall delivery rates show that they have provided a reliable source of supply. Windfalls can be expected to reduce consequent upon the making of the NDP, since this will provide settlement boundaries for the villages and planning policies to manage development which are more detailed than those presently available in the Local Plan Core Strategy. Nonetheless, the previously-suggested windfall allowance of 10 dwellings remains a conservative estimate for the remaining 13 years of the plan period.
- 2.5 On this basis, there is a remaining housing requirement of at least six dwellings.

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<sup>2</sup> Defined in the National Planning Policy Framework as sites which have not been specifically identified as available in the Local Plan process.

### **3. Sites for re-assessment**

#### **3.1 The scope of the re-assessment**

3.1.1 As explained above, the 2015 HSA reviewed 18 sites in and adjacent to the villages (Plan 2). Four sites were shortlisted for detailed assessment:

- 3 Alders End Lane
- 6 Church View/The Vine
- 8 Stocks Field
- 16 Little Tarrington Farm

3.1.2 The agents or owners of these sites were contacted by the Clerk to Tarrington Parish Council in January 2018 and asked to confirm the availability of their sites. Positive replies were received from all, except for site 6 (no reply at the time of writing).

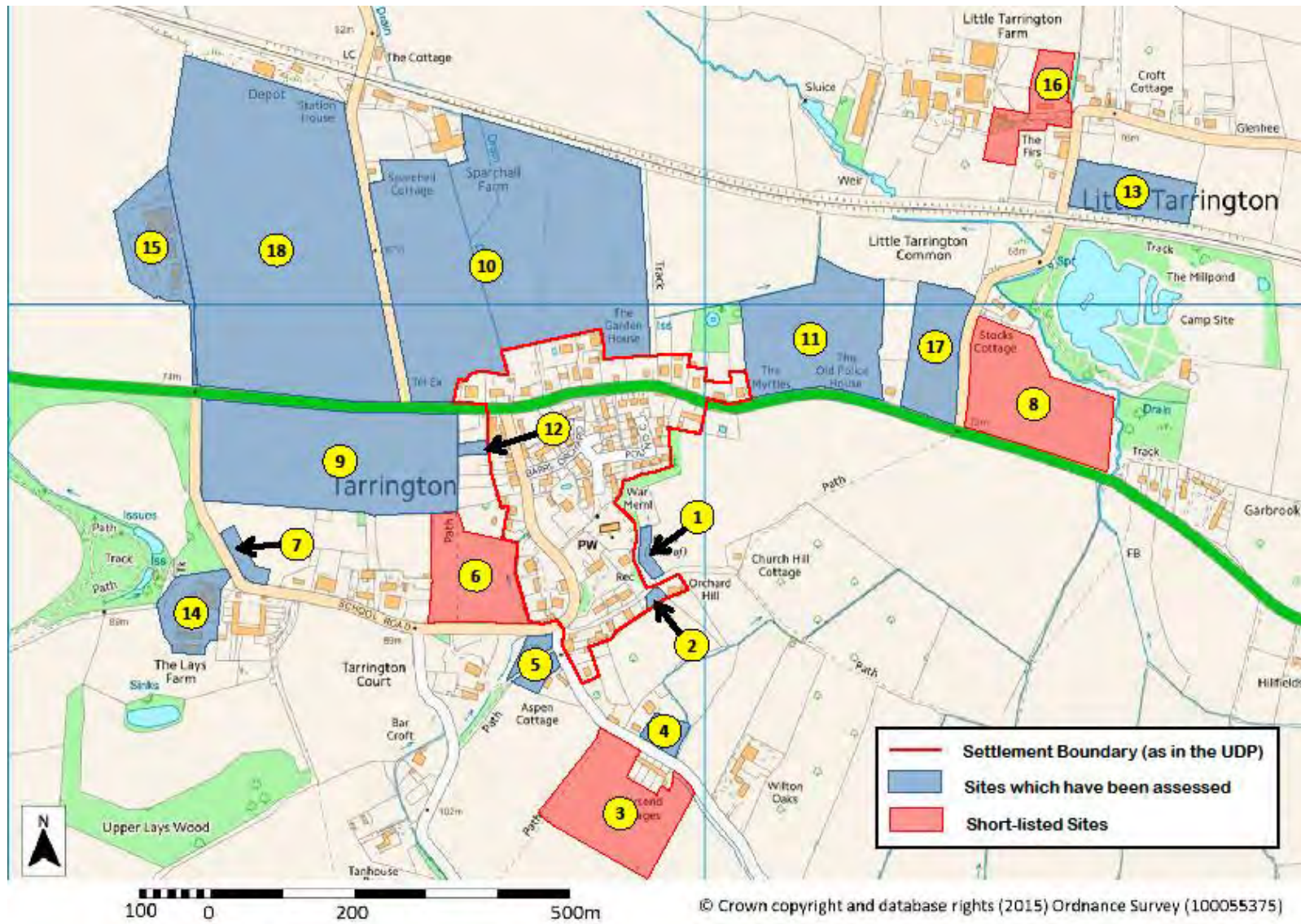
3.1.3 An unsolicited submission of a further site was made to the Parish Council in January 2018. This requested that land at the Old Police House be included in the list of sites for possible development within the NDP process. The site lies north of the main road, between sites 11 and 17 on Plan 2. An indicative layout shows seven new houses to the rear of the Old Police House, which is to remain. At the same time, pre-application planning advice was sought from Herefordshire Council. Whilst a copy of the request was provided to the Parish Council, the resultant advice is confidential and hence the outcome is not known.

3.1.4 The land at the Old Police House has not previously been brought forward in response to site search exercises, such as the SHLAA or the 2015 NDP Call for Sites. The pre-application submission explains that in light of the Planning Committee decision to approve housing on land between Garbrook and Little Tarrington and the continuing need for new housing within the locality of Tarrington, it is believed that the site offers an appropriate opportunity to meet part of that need.

3.1.5 For this Update, the site has been considered in terms of its relationship to the identified settlements. It is not in or adjacent to Tarrington, from which it is separated by intervening open countryside. Nor is it in or adjacent to Little Tarrington. The extent of Little Tarrington in light of the recently-approved scheme is the subject of consideration later in this report, but there is intervening farmland between the site and Little Tarrington Common Road to the east. To all intents and purposes, the site is in open countryside and is separate from the two settlements identified in the Local Plan Core Strategy as future recipients of housing growth.

3.1.6 The suitability of the site is also significantly constrained by its size and shape. The indicative layout shows dwellings arranged perpendicular to the highway and extending to the rear in a linear format. There is limited opportunity to provide a less intrusive or more considered layout, or to establish landscaping by way of mitigation. Moreover, the site has a poor relationship with the established pattern of development in the locality. For example, that part of Tarrington village which lies to the north of the main road is mainly restricted to frontage development.





**Plan 2: Sites considered in the 2015 HSA**



- 3.1.7 For these reasons, it is recommended that the site is not considered further as a candidate for allocation in the NDP.
- 3.1.8 The remainder of this section sets out an assessment of the four sites listed in paragraph 3.1.1 above. Please refer to the 2015 HSA for details of the methodology used.

### **3.2 Site 3: Alders End Lane**

#### *Site overview*

- 3.2.1 This site comprises a 2.27 ha field set to pasture with hedgerow boundaries. The site wraps around four dwellings, Aldersend Cottages and garage block; these interrupt the field boundary to the highway. The land rises from the road towards the south-west, with elevated views across to the Malvern Hills from the site's southern boundary. Public footpath TR5 runs along the western boundary. Adjoining land uses to west, south and east are agricultural, with scattered residential opposite together with discounted site 4.

#### *Planning policy context*

- 3.2.2 The site lies outside and separate from the village, as represented by the former UDP settlement boundary. At its closest this is 60m to the north of the site, on the opposite side of the road. No land on the west (site) side of the road is included in the settlement boundary. The site does not have a strong residential context and represents open countryside, notwithstanding the wayside dwellings in the immediate environs.
- 3.2.3 Considered against Local Plan Core Strategy policy RA2, the site is not located in or adjacent to the main built-up area of the settlement.

#### *Potential impacts*

- 3.2.4 The site has no recorded heritage asset, archaeological or biodiversity constraints. However, development of the site in depth, onto the rising land to the south, would create adverse landscape impacts due to its elevated nature and resultant visibility in medium and long-distance views.

#### *Physical features*

- 3.2.5 Vehicular access to the site is available from the adopted, unclassified Alders End Lane which forms part of the northern boundary. This is a single track rural lane with limited forward visibility. Away from the site frontage there is restricted opportunity for improvements such as the creation of passing places.
- 3.2.6 The site is not crossed by any overhead services.
- 3.2.7 There is no record for the site on the Environment Agency Flood Map. A local watercourse runs along part of the site's northern boundary in highway ditch before flowing north.

### *Concluding assessment*

- 3.2.8 Site 3 lies in open countryside, away from the main built-up area of the village. It does not meet the requirements of Local Plan Core Strategy policy RA2 as to the location of sustainable housing growth.
- 3.2.9 The character of the rural lane which adjoins the site is derived from a mix of hedgerow boundaries backed by open fields, with occasional wayside dwellings of varied age and construction. Development on site 3 in whole or in part, for instance through a frontage scheme, would be to the detriment of the local character and the village's open countryside context. Development of the more elevated areas of the site would lead to significant landscape impacts; existing dwellings along the lane respect the topography, and development on higher ground would be discordant.
- 3.2.10 For these reasons, the site is not suitable for development, in whole or in part during the plan period. It should not be considered further for allocation in the NDP.

### **3.3 Site 6: Church View/The Vine**

#### *Site overview*

- 3.3.1 Site 6 comprises a 1.7 ha field set to pasture. The site adjoins the unclassified School Road to the south, with an unmanaged roadside treed hedgerow. There are hedgerow boundaries to the west and north; a newly-planted hedge to the north-east; and mature planting to the east alongside a watercourse which flows to the north. Public footpath TR3 crosses the site on a north-south alignment. The field lies between residential properties to the east (New Barn, Church View and Brook House) and the west (grounds of The Vine). Further to the west are other dwellings and the Community Hall. The site has a complex topography, with levels rising from School Road and the watercourse to form a ridge; levels then fall towards the A438 to the north.
- 3.3.2 The 2015 HSA concluded that the site has potential for development subject to the need to respect landscape and heritage assets. An outline planning application for the erection of up to 15 dwellings was submitted in April 2017.<sup>3</sup> The application was refused in June 2017, with the reasons for refusal citing adverse effects on the character and appearance of the area and the setting of designated heritage assets, and traffic impacts/lack of provision of sustainable transport choices.

#### *SHLAA information*

- 3.3.3 The site is assessed within the SHLAA (HLAA/002/003), where it is identified as having a potential housing capacity of 50 dwellings but with significant constraints (2009 edition)/medium suitability (2015). In particular, the SHLAA notes that:

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<sup>3</sup> Planning application P171165/O, site to erect up to 15 dwellings, all matters reserved apart from access. Land north of School Lane, Tarrington, Herefordshire. Refused 30 June 2017.

*The local highway infrastructure is narrow, the site being fronted by the single track U66207 which would not be suited to any significant intensification of use. Improvements to pedestrian links to village amenities are also problematic.*

#### *Other information*

- 3.3.4 A number of relevant studies have been undertaken in respect of or including the site, as well as the 2015 HSA:
- site analysis and housing layout by Rural Solutions for Stoke Edith Estate, May 2015;
  - Landscape Comments on Three Potential Housing Sites in Tarrington, Herefordshire, by Carly Tinkler CMLI for the NDP Steering Group, September 2015;
  - Assessment of Heritage Impacts study by JME Conservation Ltd. for Mr. A. Bush, an interested party, October 2015;
  - Landscape and Visual Appraisal by Morgan Henshaw for Mr. A. Bush, January 2016;
  - Landscape Assessment of the site by Carly Tinkler CMLI for the NDP Steering Group, July 2016; and
  - Supporting information to planning application P171165/O, together with consultation responses, available on line at <https://www.herefordshire.gov.uk/>.

#### *Planning policy context*

- 3.3.5 The site lies adjacent to the built-up area of Tarrington, as represented by the former UDP settlement boundary. This follows the watercourse along the site's eastern boundary. The site has a clear village context with further residential and the community hall to the west.
- 3.3.6 Considered against Local Plan Core Strategy policy RA2, the site is located adjacent to the main built-up area of the settlement.

#### *Potential impacts*

- 3.3.7 The site has no recorded biodiversity constraints. The field to the north-east within the grounds of Brook House is a traditional orchard (recorded on the Priority Habitat Inventory (PHI)). There are no archaeological records for the site in the Historic Environment Record although several entries nearby including for Aspen, Swan House and Tarrington Court.
- 3.3.8 Trees to the east of the site within the brook corridor and rear gardens of Church View properties are subject to Tree Preservation Order (excludes poplars).
- 3.3.9 There are heritage assets within the vicinity of the site. To the east along School Road and beyond the brook, New Barn is a grade II listed barn and attached cider house although local records indicate the original structure was fire-damaged and demolished prior to a re-build in circa. 2003. Within the grounds of Brook House is a complex of three grade II listed buildings: cart shed, stables, and barn. To the west, at The Vine is a grade II listed doorway and a cider house and stables. Brook House and The Vine are identified as of local significance in the 2015 Assessment of Heritage Impacts study.

- 3.3.10 The listed buildings at The Vine are some distance from the site with limited inter-visibility and their setting will not be materially affected. New Barn lies on the far side of the brook; provided care is taken in the positioning of the site access, the existing mature screening will lessen impacts on any surviving historic asset interest. The principal concern arises from the Brook House complex. Here the three listed buildings are representative of a previous agricultural economy, set within an open landscape with a surviving visual link to the surrounding fields. They are overlooked by the higher land within the site and are clearly visible to users of the public footpath.
- 3.3.11 To protect this setting and reduce the harm that would otherwise occur, the Assessment of Heritage Impacts study recommends pulling development back from the crest of the ridge and concentrating on a smaller area to the south of the site, along and set back from the highway frontage. The principle of this is supported and is considered further below. This will address one of the reasons for refusal in the recent planning decision and ensure that the listed buildings can continue to be appreciated, including by users of the public footpath, within an open rural, agricultural setting.
- 3.3.12 The landscape implications of development have been the subject of a number of technical studies undertaken for the NDP and for the recent planning application, commissioned variously by the landowner, the NDP Steering Group and independently. The overall consensus of this body of work is that the focus for new development should be restricted to the south-east of the site. The most recent commentary is provided by the Council's Landscape Officer in her consultation response on the planning application and is quoted below. The reference to "Ms Tinkler's findings" is to the Landscape Assessment of the site undertaken for the NDP Steering Group in July 2016:
- I concur with Ms Tinkler's findings that built form should be confined to the south east of the site and the extent to which this encroaches into the northern section of the field should be clearly identified in relation to the landform ... there is a natural stop at the narrow point of the field, which is more or less in line with the curtilage boundary to the west at The Vine. The northern section of the site should remain undeveloped, given the adjacent traditional orchard and the history of the site itself further orchard planting would be appropriate. An attenuation pond in the north east<sup>4</sup> corner – the lowest point of the site - would appear logical and can offer potential enhancement. The creation of a pedestrian link to the village core via a footbridge is also an attractive proposition which would be beneficial to the community. ... I think there is a strong argument for retaining the western half of the site as undeveloped – this will reduce the adverse visual effects for users of PROW TR3 and will prevent coalescence.*
- 3.3.13 The available evidence provides a basis for addressing the concerns over landscape impact which have led in part to the recent refusal of planning application. As indicated above, the July 2016 Landscape Assessment also includes relevant proposals to foster sustainable transport choices, and so to address another reason for refusal.

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<sup>4</sup> The attenuation pond proposed in the planning application is in the south-east corner.

### *Physical features*

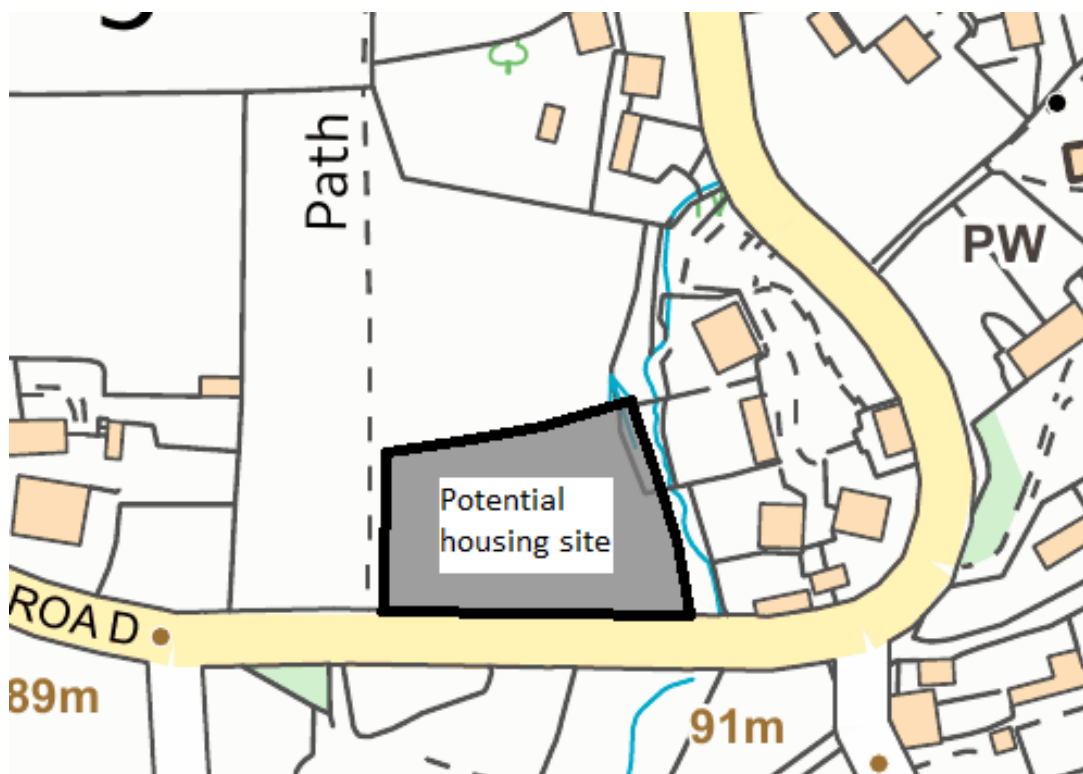
- 3.3.14 Vehicular access to the site is available from School Road. This is a single carriageway highway with generous verges which would offer scope for road widening, the provision of passing places and of footways. There is good forward visibility in both directions adjacent to the site.
- 3.3.15 Public footpath TR3 is well-used and valued. It follows a long-established alignment, evidence of a desire line between School Road and the A438, with scenic views to the village and church to the east and the surrounding countryside. This route has value in its own right and should be retained on its present alignment.
- 3.3.16 The site is crossed by overhead power lines. In respect of drainage, Dwr Cymru Welsh Water had no objection (subject to conditions) to the recently-refused planning application. There is no record for the site on the Environment Agency Flood Map. Land drainage was considered in assessing the recent planning application when it was concluded that, with suitable planning conditions, the requirements of the appropriate Local Plan Core Strategy policy could be met. For the present stage of plan-making, any site allocation policy should include reference to the need for the development to incorporate sustainable drainage methods to manage surface water appropriate to the hydrological context of the site.

### *Concluding assessment*

- 3.3.17 The site meets the locational requirements of Local Plan Core Strategy policy RA2. The site has been the subject of significant technical assessment, including through the recent planning application. This evidence supports the overall conclusion that the site does have some potential, provided that the extent of development is carefully limited to avoid undue impacts. The principal issues to be addressed are as follows.
- 3.3.18 Heritage assets: there are designated and non-designated heritage assets nearby. The principal concern arises in terms of potential impacts on the setting of the three listed outbuildings at Brook House to the north-east. This is capable of being addressed by avoiding development in the northern and north-eastern part of the site.
- 3.3.19 Landscape factors: the site has a complex topography with levels rising generally from the watercourse and highway, with the higher land affording views over the village and beyond and also being exposed to inward views from both north and south. The landscape evidence points to the need to keep the higher land free from building and to limit development to the south-eastern portion of the site.
- 3.3.20 Vehicular access to the site from School Road: School Road has a straight alignment past the site, with good forward visibility in both directions, and there is scope for highway improvements utilising existing verges. As much of the existing hedgerow as possible should be retained.
- 3.3.21 Implications for the local highway network: the recent planning application was refused in part due to a lack of information on traffic impacts or proposed mitigations. Any site

allocation policy in the NDP will need to emphasise the relevant requirements to ensure that full information is brought forward to support a future planning application.

- 3.3.22 Pedestrian access: the lack of pedestrian connectivity to village amenities was a reason for refusal of the planning application. A requirement to provide sustainable transport links to and from the site should be incorporated into any site allocation policy. The suggestion in the 2016 Landscape Assessment that a pedestrian link could be created within a brook-side green buffer is sensible and is endorsed, with potential for linking through to the Church and village core via the parking area adjacent to Church View which is in Parish Council ownership. Care would be needed to respect residential amenity.
- 3.3.23 Taking all the above into account, land in the lower-lying, south-east part of the site extending to circa. 0.44 ha is suitable for development. This area is shown on Plan 3 and is identified pursuant to the 2016 Landscape Assessment which indicates a potential capacity of around six dwellings. Development would be guided by a site allocation policy in the NDP, again principally informed by the 2016 Assessment and which would address and deliver the various considerations identified above.



Not to scale

**Plan 3: Land at Site 6, Church View/The Vine**

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3.3.24 The more elevated remainder of the site to the north and west should remain undeveloped with the settlement boundary drawn accordingly. This will respect its landscape sensitivity, views into and out of the site, and the relationship with adjoining heritage assets. It will also protect the setting of the village, the countryside experience afforded to users of the public footpath, and the principle of a gap in built frontage along School Road. Consideration should be given in any planning policy to securing the reinstatement of the historic hedgerow which ran to the west of the proposed site allocation, and to orchard planting adjacent to the PHI site in the north-east.

### 3.4 Site 8: Stocks Field

#### *Site overview*

- 3.4.1 Site 8 comprises a 2.6 ha field set to pasture. The site adjoins the A438 to the south and an unclassified road to the west, with hedgerow boundaries. The field boundaries to north and east are post and wire fence. The site is level. To the north are two modern bungalows, Millbrook and Stocks Cottage. The Hereford Camping and Caravanning Club site (The Millpond) also lies to the north, and to the east. This is a 102-pitch facility within extensive grounds which include a 1.4 ha fishing lake and mature woodland to the site's boundaries. A watercourse, the Gar Brook, flows from the A438 alongside but outside the site's eastern and northern boundaries. Further to the east along the A438 is a small, established housing estate (Garbrook). A roadside footway connects Garbrook to Tarrington, running along the southern boundary of the site.
- 3.4.2 The 2015 HSA concluded that the site was in open countryside, separate from the main built-up areas of Tarrington and Little Tarrington, and so did not meet the requirements of Local Plan Core Strategy policy RA2 as to the location of sustainable housing growth. There were also concerns over the landscape impacts of development.
- 3.4.3 A full planning application for a mixed-use development including 15 dwellings and two live-work units was submitted in May 2017 for land in the west of the site.<sup>5</sup> The application was reported to Herefordshire Council's Planning Committee in November 2017, who resolved to approve the scheme. It is anticipated that a planning permission will shortly be issued on completion of a planning obligation.
- 3.4.4 To the east of the site and the Gar Brook, an outline planning application for the erection of a pair of semi-detached dwellings was submitted in June 2017 on land at No. 1 Garbrook.<sup>6</sup> The application was permitted in July 2017. A subsequent reserved matters application<sup>7</sup> was approved in December 2017. The dwellings are nearing completion.

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<sup>5</sup> Planning application P171777/F, proposed mixed use development comprising 15 dwellings including 5 affordable, 2 live work units and associated roads and footpaths, junction improvements, sustainable drainage, informal public open space, hedgerow and tree planting, land between Garbrook and Little Tarrington Common Road, Little Tarrington Road, Hereford HR1 4JA. Planning Committee resolution to approve, 15 November 2017.

<sup>6</sup> Planning application P172017/O, erection of a pair of semi detached dwellings, land at No. 1 Garbrook, Tarrington, Herefordshire HR1 4JF. Approved 25 July 2017.

<sup>7</sup> Planning application P173826/RM, approved 25 July 2017.



- 3.4.5 In both of these applications, planning officers noted a conflict with Local Plan Core Strategy policy RA2 which requires housing proposals to be located within or adjacent to the main built up area of the identified settlements – here, Tarrington or Little Tarrington. Neither scheme was considered to meet this test. However, there is a lack of a five-year housing land supply in Herefordshire. In this circumstance, the National Planning Policy Framework deems that policies for the supply of housing (such as RA2) are out-of-date and applies instead a “weighted” presumption in favour of sustainable development.<sup>8</sup> Both schemes were assessed as complying with this approach.
- 3.4.6 The position in respect of decision-making for the purposes of preparing the NDP is different. The NDP must meet certain “basic conditions”. These include a requirement to demonstrate general conformity with strategic policies such as RA2, including its locational requirements, as well as to show how the Plan contributes to the achievement of sustainable development. This is a matter of the interpretation and application of the strategic policy in the light of prevailing circumstances and is returned to below in the concluding assessment.

#### *SHLAA information*

- 3.4.7 Site 8 is assessed within the SHLAA (HLAA/285/001). The SHLAA site includes additional open land to north and east and is 2.98 ha in extent. It is rejected as having no suitability during the plan period, on the basis that:

*The site is divorced from the village and with the exception of Garbrook is without any residential context. Access directly onto the A438 would not be acceptable. Access could, depending on numbers, be provided onto the U66205 although improvements to visibility and the provision of a footway would be necessary. Eastern portion of the site is within Flood Zone 3.*

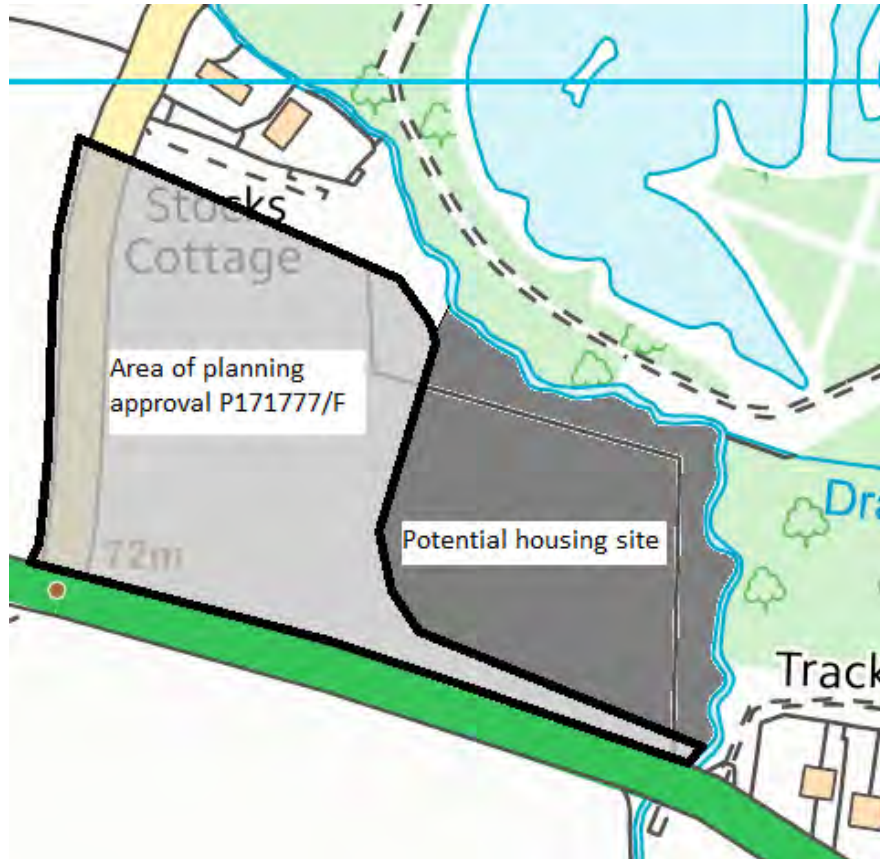
#### *Other information*

- 3.4.8 Site 8 was considered in the Landscape Comments on Three Potential Housing Sites in Tarrington, Herefordshire, undertaken by Carly Tinkler CMLI for the NDP Steering Group in September 2015. More recently, significant information including technical appraisals has been provided through planning application P171777/F, together with consultation responses, available on line at <https://www.herefordshire.gov.uk/>. In response to the Parish Clerk’s request for confirmation of availability in January 2018, the landowner’s agent has confirmed that the remainder of the site is available and provided comments on ecology, flood risk, drainage, landscape, access, connectivity, community benefits, and phasing. The site would enable a low-density development, similar to the approved scheme to the west, for up to 10 dwellings comprising eight market and two affordable homes.

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<sup>8</sup> National Planning Policy Framework, paragraphs 14 and 49.

3.4.9 This assessment henceforth refers to the remaining, eastern part of site 8 outwith planning application P171777/F, unless otherwise indicated. This remaining land ('the site') is 1.1 ha of pasture and is shown on Plan 4.



Not to scale

**Plan 4: Land at Site 8, Stocks Field.**

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*Planning policy context*

3.4.10 As highlighted above, the 2015 HSA's review of site 8 and Herefordshire Council officer assessments of planning applications in the locality have pointed to a conflict with the locational requirements of Local Plan Core Strategy RA2. These conclusions need to be considered anew in the changed context represented by the recent planning approvals.

3.4.11 In respect of Tarrington, the site lies outside and separate from the village, with some 300m of undeveloped frontage between The Myrtles and Little Tarrington Common Road (there is one intervening property, the Old Police House). The village facilities themselves lie further to the west (for instance, 675m to the Tarrington Arms).

- 3.4.12 There is also a physical separation between the site and the established, historic development at Little Tarrington. This lies to the north of the railway line and comprises farm buildings and wayside dwellings, arranged on an east-west axis.
- 3.4.13 Little Tarrington is a smaller settlement within the terms of policy RA2, where proposals should give particular attention to such aspects as site form, layout, character, location and setting. This is because the smaller settlements are seen as more sensitive to new development than larger villages. The work undertaken for the NDP has not resulted in any recommended candidates for housing site allocation in or adjacent to the historic hamlet and there is only limited windfall potential, having regard to the character and appearance of the settlement.
- 3.4.14 The site 8/Garbrook area is of a different size, scale and character to the historic hamlet. Taking the existing housing at Garbrook, the recent approval and that now proposed into account, the area has the potential to accommodate up to 48 dwellings/live-work units, significantly more than the hamlet itself (which is only some seven dwellings, excluding farm properties to the west).
- 3.4.15 The purpose of policy RA2 is to deliver sustainable housing growth in the rural settlements of Herefordshire. The allocation of the site in the NDP within a suitable settlement boundary will enable housing growth, including an element of affordable housing which is offered although there is no planning policy requirement to do so. The site will benefit from the improved footway connectivity to both Tarrington and Garbrook, to be delivered through the approved scheme, which will enable convenient access to local bus stops. In this respect, it is preferable to any site which may be considered in the historic hamlet to the north of the railway line, which is remote from local services and without reasonable prospect of connectivity improvements. In short, it represents sustainable housing growth which will consolidate the recently-permitted scheme and make efficient use of land and infrastructure.

#### *Potential impacts*

- 3.4.16 The site has no recorded heritage asset or biodiversity constraints. The deciduous woodland adjoining to the north and east is a PHI site.
- 3.4.17 Previous assessments of site 8 highlighted concerns over the landscape impact of development. These objections have been superseded by the recent planning approval. On completion of this scheme, the site will sit alongside built form to both the west and the east (Garbrook). From the A438 and views from higher ground to the south, it will be seen against the backdrop of mature woodland. Its development will fill a 'gap' on the road frontage, from which it will be set back to the rear of the footway which is already approved and which will improve pedestrian connectivity to Garbrook. In terms of its implications for the character and appearance of the area, the site is suitable for development.

### *Physical features*

- 3.4.18 Vehicular access to the site is proposed via the approved development to the west which is to be accessed from Little Tarrington Common Road.
- 3.4.19 The site is not crossed by any overhead services.
- 3.4.20 The Environment Agency Flood Map indicates an area of Flood Zone 2 and 3 associated with the corridor of the Gar Brook, and which is shown to affect land on the eastern and northern margins of the site. However, an updated Flood Risk Assessment (FRA) submitted to support the recent planning application and agreed with the Environment Agency in August 2017 indicates that all of Site 8 is within Flood Zone 1 (lowest risk). On this basis, flood risk is not a constraining factor on development.
- 3.4.21 In respect of surface water drainage, the approved scheme makes use of an attenuation pond as part of sustainable drainage proposals, and the agent has confirmed that this could be increased in capacity if necessary to accommodate additional runoff from the site. Any site allocation policy should include reference to the need for the development to incorporate sustainable drainage methods to manage surface water appropriate to the hydrological context of the site. It is understood that there is capacity within the foul drainage network and treatment works for development of the site as proposed.

### *Concluding assessment*

- 3.4.22 The site has the potential to deliver sustainable housing growth. The scale of the development recently approved to the west and now proposed on the site, in conjunction with the existing housing at Garbrook, represents a sufficient critical mass of built form to be recognised by means of a settlement boundary. It falls to NDP's to define the extent of settlements by means of settlement boundaries,<sup>9</sup> providing a means for local communities to influence the development of their locality. The allocation of the site within a settlement boundary encompassing Site 8/Garbrook will both respect the character of the historic hamlet, by avoiding the need to consider inappropriate development, and provide for housing growth in a sustainable manner.

## **3.5 Site 16: Little Tarrington Farm**

### *Site overview*

- 3.5.1 Site 16 is 1.07 ha of land comprising principally paddock, pasture, and orchard. The site is bisected by two driveways, leading from the unclassified highway to the complex of buildings to the west and comprising the farmhouse, other residential and a range of small businesses. There are two dwellings within the site, fronting onto the northern driveway, which are to remain. To the east of these, separated by open frontage, is The Gables dwellinghouse. This open frontage was the subject of an unsuccessful residential planning

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<sup>9</sup> Local Plan Core Strategy policy RA3 and paragraph 4.8.23.

application/appeal in 2005. There is further residential to the south and east (The Firs, Waggoners Cottage). Boundaries are principally post and wire fence.

#### *SHLAA information*

3.5.2 Little Tarrington has not been subject to SHLAA assessment by Herefordshire Council.

#### *Other information*

3.5.3 The site has been submitted as a result of the Call for Sites and the extent and format of development is under initial consideration at this stage.

#### *Planning policy context*

3.5.4 Little Tarrington is one of the smaller settlements identified for “proportionate growth” in Local Plan Core Strategy policy RA2. The policy requires that proposals should give particular attention to such aspects as site form, layout, character, location and setting. The immediate context of site 16 is of wayside development to the east and the larger farm complex to the west.

#### *Potential impacts*

3.5.5 That part of the site south of the southern access track is a Priority Habitat Inventory site (traditional orchard). Little Tarrington Farm is recorded on the Historic Environment Record.

3.5.6 The designated heritage assets of The Firs (farmhouse, cider house and stable) and Waggoners Cottage, all grade II listed buildings, are roadside properties to the east of, but not adjacent to, the site.

#### *Physical features*

3.5.7 Vehicular access to land parcels within the site is available from the existing access tracks.

3.5.8 The site is crossed by overhead power lines. There is no record for the site on the Environment Agency Flood Map. However, the village access from the south is recorded as Flood Zone 3 south of the railway line. Alternative highway access to/from Little Tarrington is available to the A438 and to Ashperton.

#### *Concluding assessment*

3.5.9 The site is in the settlement of Little Tarrington and so meets the locational requirements of Local Plan Core Strategy policy RA2. The traditional orchard status of land in the south excludes this part of the site from consideration. To the north, site factors limit the scope for development to the driveway frontage only. Development in depth would extend unduly alongside The Gables curtilage and to the rear of the existing dwellings, risking unnecessary impacts on residential amenity. There is also the potential for amenity conflicts between any new dwellings and the established small business uses to the west. However, since the 2015 HSA was completed, retrospective planning permission has been

granted for these uses, which were previously unregulated.<sup>10</sup> The permission includes a condition to control hours of working, in the interests of amenity. Levels fall away from the settlement and driveway towards the north, so that new dwellings would be visible in medium and long-distance views. Finally, in the context of the site existing dwellings front onto the roadside only, so that development in depth would not respect the overall settlement pattern.

- 3.5.10 Save for the frontage potential noted above, the site is not suitable for development during the plan period. Consideration should be given to including the frontage onto the northern driveway within the settlement boundary, extending as far north as the curtilages of the existing pair of dwellings. This will support the NDP windfall assumptions. The 2005 appeal decision here pre-dated the inclusion of Little Tarrington in the Local Plan Core Strategy as a settlement where proportionate housing is appropriate.

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<sup>10</sup> Planning application 161393, retrospective planning application for the change of use of former agricultural buildings for commercial uses (Class B2), buildings at Little Tarrington Farm, Little Tarrington, Herefordshire HR1 4JA. Granted 25 July 2016.

#### **4. Conclusions and recommendations**

- 4.1 This update to the 2015 HSA has reviewed the four original shortlisted sites. There has been no change in site-specific circumstances in relation to sites 3 and 16. The conclusion that they are not suitable for development remains.
- 4.2 In respect of site 6, a considerable body of evidence has accrued through the NDP process and the determination of the recent planning application. Taking all this into account, land in the lower-lying, south-eastern part of the site is suitable for development with a potential capacity of around six dwellings. Its availability will need to be confirmed. The more elevated remainder of the site should remain undeveloped to respect landscape sensitivity, views into and out of the site, and the relationship with adjoining heritage assets; and to protect the setting of the village, the countryside experience afforded to users of the public footpath, and the principle of a gap in built frontage along School Road.
- 4.3 To take these conclusions forward in the NDP will require:
- Confirmation of the availability of the land shown at Plan 3 for residential development of around six dwellings;
  - Allocation of the land and provision of a planning policy to guide development, to be informed by the 2016 Landscape Assessment; and
  - Inclusion of the allocated site within a settlement boundary which would be drawn to exclude the remainder of site 6.
- 4.4 In respect of site 8, there is a Planning Committee resolution to approve planning permission on land in the west of the site. The remaining parcel of land in the east is also free of development constraints, including flood risk, and in these terms is both suitable and available for development.
- 4.5 To take these conclusions forward in the NDP will require:
- Allocation of land shown at Plan 4 for residential development of around ten dwellings;
  - Provision of a planning policy to guide development; and
  - Inclusion of the allocated site within a settlement boundary. This would most logically be drawn to include all of site 8 along with the established housing at Garbrook.
- 4.6 It is recommended that further consideration is given to progressing these two sites as described within the NDP. Only one is required to demonstrate delivery of the minimum housing requirement. Equally, there is no reason why both sites should not be allocated. Public consultation should be held to guide the final decision on which site(s) are to go forward.



## Latham, James

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**From:**  
**Sent:** 09 November 2020 15:25  
**To:** Neighbourhood Planning Team  
**Subject:** Tarrington NDP - the process

**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 Mr Gabb/NDP team

I write to note my concerns that the process by which the Tarrington NDP was developed by the parish council, may have made the plan invalid.

My reasons are as follows:-

1. The process began in 2013, 7 years ago. The situation has changed substantially since then.
2. The first consultation, an open day in May 2014 was followed by a survey in September/October 2014 (published in November 2014). This survey formed the basis on which the whole plan has been constructed. However, 6 years have passed, life has changed, these survey results are now no longer valid.
3. The community steering group operated effectively from 2014 to 2018 (I was a member of the SG during this time). In 2018 the SG was terminated by the parish council who were unhappy with the community's direction of travel with the NDP.
4. From 2018 the parish council took over the NDP.
5. From 2018 under the parish council there were no public meetings, thus no records/minutes of meetings and importantly no declaration of interests (note the Community steering group meeting always declared interests (a DI was indicated if you lived near to a site).
6. The process between 2018/2020 has not been open, with no public meetings and no option for the community to be involved in the NDP discussions. (Note that when the NDP was discussed in a parish council meeting the public were prevented from speaking).
7. The community has effectively been excluded from the process from 2018.

This Tarrington NDP should have been community led, this did not happen. I would like to ask that, because of the passage of time and the lack of involvement from the community, the assessor considers whether the Tarrington NDP is still valid.

With Kind Regards

Anthony Bush

## **Latham, James**

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**From:** Turner, Andrew  
**Sent:** 21 October 2020 15:07  
**To:** Neighbourhood Planning Team  
**Subject:** RE: Tarrington Regulation 16 submission neighbourhood development plan consultation

### **RE: Tarrington Regulation 16 submission neighbourhood development plan consultation**

Dear Neighbourhood Planning Team,

I refer to the above and would make the following comments with regard to the above proposed development plan.

It is my understanding that you do not require comment on Core Strategy proposals as part of this consultation or comment on sites which are awaiting or have already been granted planning approval.

Having reviewed records readily available, I would advise the following regarding the allocated housing development site, '*Policy TAR8: Land at School Road, Tarrington*' indicated in brown on the '*Tarrington Village Policies Map*'.

#### **Policy TAR8: Land at School Road, Tarrington**

- As referred to in section 5.17 of the NDP, a review of Ordnance survey historical plans indicate the site has historically been used as an orchard.

By way of general advice I would mention that orchards can be subject to agricultural spraying practices which may, in some circumstances, lead to a legacy of contamination and any development should consider this

#### **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



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 and Strategic Planning Team  
Herefordshire Council

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

21 October 2020

Dear Neighbourhood Planning and Strategic Planning Team

**Tarrington Neighbourhood Plan Regulation 16**

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:** Norman Ryan <Ryan.Norman@dwrcymru.com>  
**Sent:** 01 October 2020 13:40  
**To:** Neighbourhood Planning Team  
**Subject:** {Disarmed} RE: Tarrington 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,

Thanks for consulting Welsh Water on the below.

As you will be aware, we provide a consultation response to the Reg 14 stage in 2019 and as such have nothing further to add.

If you require any further info, then please let me know.

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: [dwrcymru.com](http://dwrcymru.com)

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

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**From:** Neighbourhood Planning Team <[neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk)>  
**Sent:** 28 September 2020 11:19  
**Subject:** Tarrington Regulation 16 submission neighbourhood development plan consultation

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

Dear Consultee,

Tarrington 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/3108/tarrington-neighbourhood-development-plan>

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

The consultation runs from 28 September 2020 to 9 November 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.

## Latham, James

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**From:** clerk@dormingtonmordifordgroup-pc.gov.uk  
**Sent:** 25 October 2020 11:10  
**To:** Neighbourhood Planning Team  
**Subject:** TARRINGTON REG 16 SUBMISSION 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.

Dormington and Mordiford Group Parish Council have considered Tarrington NDP and would like to support the proposals being made.

Many Thanks

## Chris

Chris Bucknell  
Clerk to Dormington and Mordiford Group Parish Council

Mobile: 07777 669 662  
[www.dormingtonmordifordgroup-pc.gov.uk](http://www.dormingtonmordifordgroup-pc.gov.uk)

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## Latham, James

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**From:** Edward Watkins  
**Sent:** 09 November 2020 23:03  
**To:** Neighbourhood Planning Team  
**Subject:** Tarrington Neighbourhood Development Plan 2011-2031 - Submission Draft July 2020 Regulation 16 Consultation  
**Attachments:** Response to NDP Submission July 2020 9.11.2020.pdf; Response to NDP consultation Reg14 25.11.2019.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 Sirs

Please find attached my response to the above Submission Draft NDP for Tarrington. Also attached are my comments to the previous Consultation Draft NDP dated February 2019, which I submitted 25.11.2019. I think much of the content is still relevant and goes into more detail on some areas. I refer to my 25.11.2019 submission where I have provided more information in that document.

I understand that it is possible to be notified of the planning authority's decision under Regulation 16 and I would be grateful if you could do this in due course.

Yours faithfully

Edward Watkins

Tarrington Neighbourhood Development Plan 2011-2031

Submission Draft July 2020

Regulation 16 Consultation

Response from Edward Watkins

## **Background**

On 25 November 2019 I submitted a detailed response to the Consultation Draft of the Tarrington NDP (Dated February 2019) in which I highlighted the errors and inconsistencies in that document compared to both the previous version dated September 2018 and the Housing Site Assessment update Dated April 2018. I have attached a copy on my submission as this deals with the points raised on that version of the Draft NDP. Please review that submission as some of the detail issues with that version of the NDP Draft will not be repeated here and are still relevant.

The Housing Site Assessment and the September 2018 Draft NDP recognised the merits of the Stocks Field Site at Little Tarrington. At that time planning permission had been granted on the Stocks field for 15 houses and 2 live-work units. Also permission was being sought for a further 10 dwellings. The permission granted and the proposed development were reflected in that Draft NDP.

The School Road Site had been the subject of a number of reports due to the challenging topography and the effect on the landscape as well as the effect on listed buildings close by. Included in those reports was one by Carly Tinkler in July 2016 which incorporated the local residents' views of the site and the importance of the site in its current form to them. In her report Carly Tinkler concluded that if the site was to be developed, in order to avoid excessive damage to the landscape, including views in and out of the site and detrimental effects on the listed buildings close by, including St Philip & St James Church the development needed to be restricted to a small area in the south east corner measuring 0.44ha. She set out what could be done to mitigate the harm on the landscape, views and listed properties but even with these measures thought that no more than 6 houses could be built.

In the September 2018 Draft NDP The School Road site was included at 0.44ha with a potential for around six dwellings which was consistent with Dr Nicholson's statement in para 3.3.23 of the April 2018 Housing Site Assessment, which was broadly in line with The Carly Tinkler report.

The Stocks Field site was included in the September 2018 Draft NDP as planning had been obtained on part of the field and was being sought on the rest as referred to above.

The conclusion regarding choice of sites was that: **“Only one site is required to demonstrate delivery of the minimum housing requirement. Equally, there is no reason why both sites should not be allocated. Public consultation should be held to guide the final decision on which site(s) are to go forward”.**

Public consultation did not take place and a revised Draft NDP dated February 2019 was



prepared excluding all reference to the Stocks Field site, even though it had received permission for a total of 25 houses and 2 live-work units. The School Road site, however had been increased in size from 0.44ha to 0.65ha and the associated numbers changed from “Around 6” to “A minimum of 6” These discrepancies and others were pointed out in my response of 25 November 2019.

## **Comments on the July 2020 Submission Draft**

### **Neighbourhood Area**

In paragraph 2.3 it states that “The smaller settlement of Little Tarrington lies to the north of the railway line”. This is unchanged from the February 2019 draft where it had been changed from “north of the A438 as included in the September 2018 Consultation Draft. North of the A438 is correct and is consistent with the statement in Paragraph 5.10 referring to Little Tarrington Settlement boundaries north and south of the railway line and just north of the A438.

Paragraph 2.14 refers to local watercourses, including the Gar Brook, the River Frome, River Lugg and River Wye but fails to mention the Tarrington Brook which runs down past the School Road site through the middle of the village before going under the A438 and then down towards the railway line on REDACTED. This brook floods and it is getting worse. The parish council are aware of the flooding problem both in the village centre and on REDACTED. They have expressed their concerns about it but do not seem to see that development of the Station Road site is likely to make matters worse, for reasons that will be expanded on later. Surely this waterway deserves a mention.

### **3. A Sustainable Tarrington Objectives**

Paragraph 3.4 states that the NDP will ensure that our local environment is maintained by: “Sustaining and enhancing the significance of heritage assets”.

Paragraph 3.7 states that the NDP will support community infrastructure by: “Addressing the traffic and transport implications of new development”.

I fail to see how the inclusion of the School Road site complies with these objectives. Development of this site will have a detrimental effect upon a number of heritage assets close to the site as supported by a number of reports prepared by Heritage specialists. These can be seen by looking on the planning applications for this site. This site also appears to be inconsistent with the aims set out in paragraphs 4.8 and 4.9 (Historic Environment) “Weight was given to protecting local heritage assets in the residents survey”.

Additional traffic as a result of any development on the School Road site will cause more congestion and danger in School Road, especially between the Barrs Orchard entrance and the A438. This is effectively only wide enough for one vehicle to pass through and can be very busy already with cars, walkers and farm traffic. Proposals for conversion of farm buildings into dwellings at Alders End will add to the existing traffic even without development in School Road.

## **Respecting The Environment**

Paragraph 4.4 refers to: Landscape character positively influencing development and also notes that responses from the residents' survey that gave weight to the protection of important views and the wider countryside around the village as well as protecting the natural environment. The Residents questionnaire on the importance of the School Road site showed that many people used the footpath and valued the views into and out of the site.

## **Land at School Road, Tarrington**

Paragraph 5.14 includes a site of 0.65ha compared to a recommendation in Dr Nicholson's Housing Site Assessment which concluded that 0.44ha was suitable for development restricted to the south east side as suggested by Carly Tinkler. 0.44ha was included in the September 2018 draft NDP but was changed in the February 2019 Draft as referred to above, to 0.65ha. I note that the number of dwelling has changed back to "About 6", but the area has not been corrected to the lower figure of 0.44ha. All the bodies of evidence have stated that the area should not exceed 0.44ha as to do so would allow building too far up the slope and have further damaging effects on the landscape and heritage assets close by.

There are no planning grounds for including 0.65ha. All evidence states that it is too large. See the comments made by planning office Ed Thomas when refusing the planning application on this site. For further details see my comments on the Draft NDP dated February 2019.

## **Meeting Housing Needs**

Paragraph 5.23 refers to a buffer zone to the east to, amongst other thing, enable the provision of sustainable drainage (SUDS). However the area available appears to be inadequate to provide an attenuation basin of sufficient size. Planning applications submitted on this site contain provisions, which compared with similar sites appear to be inadequate to be able to retain runoff on site and as a result is likely to discharge directly into the Tarrington Brook increasing flooding problems for residents in the village centre and ourselves. For more details please see my comments on the Draft NDP dated February 2019.

## **Community Infrastructure Transport**

Paragraph 7.2 refers to issues raised on the Open Day. "Further issues were use of the narrow lanes by heavy traffic, highway maintenance and flooding." The response to this was that "many of these matters fall outside the scope of the Neighbourhood Development Plan".

The amount of traffic in the village and in particular School Road can be influenced by where development is allowed. Flooding can be assisted by ensuring that any development does not add to existing flooding issued.

The School Road site will exacerbate both problems if allowed to be developed.

Paragraph 7.3 Refers to Local Plan Core Strategy policy MTI *Traffic management, highway safety and promoting active travel* sets out Herefordshire Council's technical highway

requirements. At the end of the paragraph it states “Both site allocations include suitable proposals”. Presumably this refers to the School Road site and the Stocks Field site. What is noticeable is that there is nothing about Stocks Field site in this Submission Draft of the NDP. This site has full planning permission and the number of dwellings should be reflected in Table 1 in paragraph 5.3 but surely details of this site should be included in the Draft NDP.

## **Community Facilities**

Paragraph 7.11 suggests that CIL money will be available to help with issues such as play areas, parks and green spaces, transport, flood defences and other community facilities. My understanding is that since October 2018 the Community Infrastructure Levy is on hold so that there will be no money under this scheme for the above facilities. Rather than looking for money to help with flood defences it is better to try and prevent flooding happening wherever possible.

## **Summary and Conclusion**

The Stocks Field site has provided a total of 27 dwellings, including 2 live-work units. This development combined with house completions and housing commitment gives 40 houses compared to a total requirement by 2031 of 43 houses. The modest estimate of windfall allowance of 10 brings the total to 50 houses well above minimum figure of 43 houses.

The figures to date show that we do not need the School Road site in order to meet our commitments and the NDP could proceed without that site. This situation was referred to by Dr Nicholson in his recommendation at the end of his Housing site Assessment Update (April 2018) **“Only one site is required to demonstrate delivery of the minimum housing requirement”**. **“Public consultation should be held to guide the final decision on which site(s) are to go forward”**.

The residents of Tarrington were not given the chance to make a choice. There has been no public consultation since February 2015 and that was flawed as it was before the change in the Core Strategy and the residents were told before the consultation that the only site that was viable was the School Road site. In October 2015 it became apparent that Stocks Field could be included and was very popular with the residents of Tarrington. Many residents and a number of the NDP Steering Group considered that the Stocks Field should be included in the NDP but there was resistance to this and the parish council members suspended meetings of the steering group in about December 2017.

Sometime later the parish council continued with the NDP but without any other resident involvement. Comments could be made in parish council meetings during the Public Participation Session for Local Residents, but this was limited, was not minuted and appeared to have little effect. The Stocks Site was not considered until after it obtained planning permission and even then was written out of the February 2019 Draft NDP. The preferred site for the parish council has always been The School Road site even though the site has many problems, will cause more problems if developed and is not popular with many of the residents of Tarrington. It is a great disappointment to many in the village that the NDP has not been a community project and has been taken over by the parish council with no meaningful input by residents. The village doesn't need the School Road site and if the

residents had been given the opportunity to choose which site or sites were to be included it could well be that the School Road site would not now be in this version of the NDP. The parish would still meet its commitment for house building but without the negative results of any development of that site such as additional traffic problems, negative effects on landscape and views, negative impact on surrounding heritage properties, the change from a rural lane into a more urban nature and of course the likely effect on increased flooding.

I am sure that the majority of the residents would welcome the opportunity to have a say in the content of the final NDP and not just be presented with a fait accompli at the referendum stage. A rejection at the referendum would be a waste of time and money as well as a lost opportunity to do the best thing for Tarrington.

## Tarrington Neighbourhood Development Plan

### Draft Plan (Regulation 14) Consultation

Response from Edward Watkins

#### **Background**

A 'Housing Site Assessment' was prepared for the parish council by their consultant Dr D J Nicholson. In this document he explained that Tarrington needed to build a minimum of 43 houses by 2031. Houses already built (2) and where planning permission had been obtained (25) could be deducted leaving a balance of 16 houses. On average permission had been obtained for 3 houses per year so an estimate of 10 windfalls during the period to 2031 was considered a conservative estimate. This left a further 6 houses to be included in the NDP.

In his Housing Site Assessment he concluded that there were two possible sites available, the School Road site and the Eastern side of Stocks field (permission having already been given for 15 houses and 2 live-work units on the west side).

#### **School Road Site**

In his comments on the School Road site Dr Nicholson stated in paragraph 3.3.12 The landscape implications of development have been the subject of a number of technical studies undertaken for the NDP and for the recent planning application, commissioned variously by the landowner, the NDP Steering Group and independently. The overall consensus of this body of work is that the focus for new development should be restricted to the south-east of the site. He then quotes the Council's landscape officer who concurs with Ms Tinkler's findings in her Landscape Assessment of the site for the NDP Steering Group in July 2016, in that the built form should be confined to the south east of the site.

In paragraph 3.3.23 Dr Nicholson states that "Taking all the above into account, land in the lower lying, south-east part of the site extending to circa. 0.44 ha is suitable for development. This area is shown on plan 3 and is identified pursuant to the 2016 Landscape Assessment which indicates a potential capacity of around six dwellings". He then goes on to say that development would be guided by a site allocation policy in the NDP, again principally informed by the 2016 Assessment.

#### **Stocks Field Site**

Planning permission for 15 houses and 2 live-work units on the west side of the site received planning permission in 2017. At the time of the Housing Site Assessment a planning application for 10 houses on the east side of the site had been submitted but was not passed until 10 March 2019.

#### **Housing Site Assessment conclusion**

Dr Nicholson stated in paragraph 4.6: "It is recommended that further consideration is given to progressing these two sites as described within the NDP. **Only one is required to demonstrate delivery of the minimum housing requirement.** Equally, there is no reason why both sites should not be allocated. **Public consultation should be held to guide the final decision on which site(s) are to go forward**". I have highlighted the two passages that I believe are particularly relevant.

## **First Tarrington Neighbourhood Development Plan Consultation Draft – September 2018**

This draft followed the conclusions in the Housing Site Assessment prepared in April 2018. The net housing requirement was shown as 16 being 10 windfall and 6 to be provided by the site(s). The land in School Road was allocated for housing development for around 6 houses (TAR8) on a build area of 0.44 ha (5.15) and Stocks Field was allocated for around 10 houses in accordance with the planning application submitted and passed in April 2019.

Settlement boundaries were defined for Tarrington and Little Tarrington as shown on Plans 4 and 5. The Tarrington Settlement boundary (Plan 4) included the 0.44 ha site on School Road. The Little Tarrington plan (Plan 5) showed two settlement boundaries. One around the historic core to the north of the railway line. The other between the railway line and the A438 which comprised the area of established housing at Garbrook and the two sites in Stocks field (15 houses, 2 live-work and the 10 in the latest application).

It will be noted that Dr Nicholson stated that “Public consultation should be held to guide the final decision on which site(s) are to go forward”. This did not happen.

The September 2018 consultation draft was based on the Housing Site Assessment which had been based on an accumulation of evidence from a number of professional reports as set out above and also took into account comments from the Council’s landscape officer. Further evidence concerning the difficulties in any development on the School Road site can be found in the Planning Officers decision report when the planning application on this site was declined on a number of grounds. These included the effect upon designated heritage assets, the fundamental change in the character and appearance of the edge-of-the-village location to a more suburban character in a manner that is substantially prejudicial to the character and appearance for the area and contrary to planning policy. Also the proposal did not demonstrate, as required that the local highway network could absorb the traffic impact of the development without adversely affecting the safe and efficient flow of traffic on the network or that traffic impacts can be adequately mitigated.

## **Tarrington Neighbourhood Development Plan Consultation Draft – February 2019**

The September 2018 consultation Draft formed a good basis to go forward. Dr Nicholson recommended that there should be public consultation to guide the final decision on which site or sites should go forward.

The residents of Tarrington have not been given an opportunity to give their views in an open day. There has only been one open day in February 2015 when the residents were told that the Stocks site could not be developed, which subsequently proved not to be the case, having obtained planning permission on the east and the west side of the site.

The NDP process is supposed to be a community led process but since a decision was taken to abandon the NDP Steering Group, the residents have lost their opportunity to participate in the process. I believe that there should have been an open day for the residents to view, discuss and give their views on the September 2018 Consultation Draft. The revised draft would then most likely have received the approval of the majority of the residents and formed a good basis to go forward.

When the NDP Steering Group was in operation it was clear from residents' comments in the open meetings that there was considerable support for the Stocks site. While the School Road site has its supporters, many residents could see the serious problems with that site, reflected in the large numbers of objections to the planning application on the School Road site.

### **Changes made in the February 2019 Consultation Draft**

While the September 2018 Consultation Draft followed logically from the Housing Site Assessment, this latest document contradicts it and is no longer based on the planning and the numerous professional reports on the School Road site. The draft has in a number of places sought to remove completely or seek to downgrade the Stocks site despite the fact that the Stocks site is popular with the residents, does not have the planning problems that are associated with the School Road site and totally ignores the fact that The Stocks site has planning permission for a total of 25 houses and 2 live-work units. The Consultation Draft is dated February 2019 which is prior to the second planning approval, but considering that the document was not made available for consultation until October 2019, it is troubling that this site has been represented the way that it has.

Specifically – Changes relating to the Stocks site

Para 2.3 Fourth line – The smaller settlement of Little Tarrington lies to the north of the *railway line*. This is factually incorrect. The September 2018 Consultation Draft stated – The smaller settlement of Little Tarrington lies to the north of the A438. This is correct.

Para 5.5 The September 2018 draft proposed allocation of land at Tarrington and at Little Tarrington for development.

The latest Draft shows in lines 2 to 8 – “The process undertaken and the resultant evidence base are summarised in the Housing Site Assessment Update (April 2008) and at Appendix A. This work has led to the proposed allocation of land at Tarrington for development for a *minimum* of 6 new dwellings. No allocations are proposed at Little Tarrington although scope for infill development at Little Tarrington Farm is acknowledged in the Housing Site Assessment update and the land concerned is included in the settlement boundary for the village.

This is incorrect. The draft plan has not included the houses on Stocks site which already have planning and the ones that obtain permission in April 2019. Note the change from “Around 6 dwellings” to “a minimum of 6 dwellings”.

Para 5.7

The reference to delivering a minimum of 43 dwellings over the plan period is inaccurate the figure is 47. The Housing Site Assessment (see above) stated that after windfalls there was a further 6 houses to be included in the NDP. When the second planning permission on the Stock site for 10 dwellings is taken into account there are an additional 4 houses (43 + 4) to give 47. Therefore Tarrington has achieved its target already and does not need any development on the School Road site.



Policy TAR5:

This is incorrect: It only allocates land for housing development at School Road. The reference to the Stocks field site has been removed.

Again, this need to be remedied. If a site is to be dropped it should be the School Road site. The Stocks field site has planning permission.

Para 5.9 Settlement boundary – Tarrington

The size of the School road site (5.15) has been increased from 0.44 ha to 0.65 ha. There is no basis for this. It is contrary to all the professional reports on this site and is also conflicting with the Council’s landscape officer’s report and the comments from the Planning Officer (See above). Also Para 5.18 is incorrect as this states that the site has a capacity for a *minimum* of 6 dwellings, whereas previously all reports have stated “around 6 dwellings” which is very different.

The Settlement boundary in Plan 4 is incorrect, being based on an unjustifiable increase in the size of the proposed build area.

Para 5.10 Settlement boundary – Little Tarrington

As in Para 2.3 reference to Little Tarrington being north of the A438 Has been changed to *north of the railway line*. This paragraph need redrafting along the lines of paragraph 5.10 in the September 2018 Consultation Draft, reflecting the areas north of the railway line and the area between the railway line and the A438.

Para 5.11 This needs deleting. It is just plain wrong and does not reflect the true position.

Plan 5 The little Tarrington Settlement Boundary need to revert back to the one used in the September 2018 Consultation Draft which included both areas of the Stocks field on which planning permission has been obtained. At present the February 2019 Consultation Draft has excluded the whole of the Stocks field which is obviously incorrect.

Para 5.14 (September 2018 Consultancy Draft)

This paragraph has been omitted from the February 2019 Consultancy Draft. It deals with the policies that the sites need to comply with, including reference to the Local Plan Core Strategy, sustainable design and energy efficiency, water management, waste water treatment, river water quality, open space, and traffic and transport.

Paras 5.15 to 5.24 and Policy TAR8 set out the proposals for the School Road site. In the September 2018 Consultancy draft Paragraphs 5.24 to 5.31 and Policy TAR9 set out the proposals for the Stocks field site. These provisions have been omitted from the February 2019 Consultation Draft. There appears to be a bit of a pattern developing here!!

Summary

There have been changes between the September 2018 Consultation draft and the February 2019 Consultation Draft which have completely changed the emphasis of the report. The Stocks field site has been written out of the report even though the field has planning

permission. The School Road Site meanwhile has been enlarged and the potential numbers of dwellings increased, flying in the face of all the planning evidence which shows that this site is suitable for at most a small area of build and preferably none at all.

### **School Road Site**

The topography of this site makes it less than ideal for development. There is a high ridge facing north and it slopes down to the north and steeply towards the east. Due to the high ridge any building on this site has to be restricted to the lower south east side of the site, keeping the area of build well away from the ridge in order to protect the landscape and to protect the setting of listed buildings close by. A number of reports have been prepared on this site and the consensus is that any area of build must be restricted to a small area of 0.44 ha on the south east of the site.

It also important to restrict the number of dwellings due to the negative effect on traffic in the village. This has been one of the factors why the planning application on this site was refused.

There is already a problem with traffic towards the junction with the A438. There are parked cars on the western side of the road near the entrance to Barrs Orchard, effectively making it a single carriageway. The problems with traffic are well known and any additional vehicle from a development would make congestion worse and effect safety in School Road.

### **Flooding**

Flooding is given very little mention in the consultation Draft, which I believe is an oversight. In Paragraph 2.14 the Consultation Draft refers to local watercourses and mentions the Gar Brook but does not refer to the Tarrington Brook which runs to the east of the School Road site, past Brook House, under School Road, alongside School Road in a north direction before going underground via a culvert and the emerging north of the village on REDACTED This brook needs to be given more prominence in the Consultancy Draft as it can cause flooding in the village. The culvert in the village has to be kept clear when there is heavy or prolonged rainfall to prevent flooding. The parish council are aware of the flooding problem but as yet no solution has been found.

The Tarrington Brook continues north towards REDACTED. There is a system to take the normal flow which goes through a 30cm culvert and goes under the railway line to the west of the farm. When the flow exceeds the capacity of the 30cm culvert the level rises and is diverted around an overflow ditch until it goes through a culvert on the east side of the farm. These culverts were built in Victorian times when the number of houses in the centre of Tarrington would have been much less. There were no housing estates then.

When we have heavy or persistent rain the brook fills up quickly due to the amount of run off from hard surfaces and the system struggle to cope. I have reviewed the Sustainable Drainage System proposed for the School Road site and from my calculations and from comparison with other systems it appears to be inadequate. As a result, if the site is developed I anticipate that during heavy prolonged rainfall (which we are getting more and more) the system, once full will discharge directly into the Tarrington Brook causing potential flooding problems for the residents of the village centre and ourselves. My fears are compounded by the specification of the discharge pipe in the proposed plan which is 30cm in diameter, which is

capable of discharging directly into the Tarrington Brook an additional amount of water equivalent to the capacity of one of our culverts, increasing the total amount of flow well beyond what it was designed for. Under the Sustainable Drainage Rules new developments should not increase the run off from the site above that of the undeveloped site. It would appear to me that due to the steep gradients on this site it would not be possible to achieve that requirement.

I wrote to the parish council on 4<sup>th</sup> March 2014 explaining this to them asking that they take flooding into account when considering the NDP. It does not appear that they have taken into account the flooding problem when considering the Consultation Draft.

## **Conclusion**

The February 2019 Consultancy Draft has been totally changed from the previous draft in September 2018. No consultation with the residents has taken place in order to move forward with a plan that reflected the wishes of Tarrington. Instead the latest draft has effectively tried to remove the Stocks Field site (which has planning permission) from the plan while at the same time increasing the size and number of houses on the School Road site, totally ignoring the planning criteria and all the reports and information demonstrating that the site is unsuitable for development.

The numbers of dwellings in the plan are now 47 without the School road site. This site is therefore no longer required, and bearing in mind all the potential negative impacts of any development on this site, given the opportunity to voice their opinions the residents of Tarrington may well consider that the School Road site can be removed from the next Consultation Draft.

Bearing in mind all the errors and incorrect treatment of the information in this consultation draft, the question is how could a document with this many discrepancies be produced, especially following on from a previous version that was such a good starting point?

It is obvious that the February 2019 Tarrington Neighbourhood Development Plan 2011 – 2031 Consultation Draft is not fit for purpose. It need to be completely redrafted with input from the residents of Tarrington.

**Latham, James**

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 15 October 2020 12:45  
**To:** Neighbourhood Planning Team  
**Subject:** A comment on a proposed Neighbourhood Area was submitted

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| Comment on a proposed neighbourhood plan form submitted fields |   |
|--|---|
| Caption  | Value   |
| Address  |   |
| Postcode   |   |
| First name   | EDWARD  |
| Last name  | WILLMOTT  |
| Which plan are you commenting on?                              | Tarrington Neighbourhood Development Plan Consultation before 9 November 2020   |
| Comment type   | Objection   |
| Your comments  | Housing Delivery paragraph 5.5 states the proposal for "around six new dwellings" Policy TAR 5, paragraph 1 mentions no number. My objection is that these statements are not specific enough to limit the number of new dwellings on that site. I recommend that the words "up to six new dwellings" are inserted into both paragraph 5.5 and into Policy TAR5. Similarly Paragraph 5.18 first sentence and TAR8 first sentence should have the words "up to six new dwellings" inserted so as to limit the housing development. At Paragraph 5.24 a new sentence should be inserted to ensure that the developments are flexible enough to enable the housing to de-carbonise heating so as to pass the net zero emissions law requiring all greenhouse emissions to be net zero by 2050. |

**From:**  
**Sent:** 08 November 2020 11:01  
**To:** Neighbourhood Planning Team  
**Subject:** Tarrington NDP

**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 would be grateful if you could record our objections to the draft Tarrington Neighbourhood Development Plan. We consider that this plan is seriously flawed and fails to represent the best interests of the Tarrington community.

We strongly agree with the points raised by Mr Richard Price, REDACTED which were sent to the Parish Council and are copied below (with slight amendment to point 2):

### **"Core Objections**

1 The crucial Table 1 figures at para 5.3 are incorrect. They are the same as appeared in the 2018 draft Consultation document ("the 2018 Draft") and therefore fail to take into account that a total of 27 units have now been approved by Herefordshire Council on the site south of the Millpond, on the A438. Thus the housing remaining to be delivered in that Table should be 14. Para 5.6 then allows for a "conservative" estimate of 10 "windfall" houses during the period, leaving just 4 houses to be found (although if one dared to be less conservative one might take the view that in fact natural growth will meet our housing quota).

2 Based on the error described above, the recommendation in paras 5.5 and 5.8 is for a "around" 6 houses. Putting aside for the moment the accuracy or otherwise of the figure, to seek community approval of an undetermined figure is frankly nonsense. People want to know how many houses they are approving or refusing. What is the number: 4 or 10 or what?

3 In para 5.15 the area identified for housing on the School Road site is given as 0.65 hectares. It is not clear where this figure has been plucked from. The 2018 Draft gives this figure as 0.44 hectares which was based on the Carly Tinkler landscape report and 2 further heritage reports (referenced in the Evidence Base Appendix A but seemingly ignored). The key reason for this lower figure was that any development should be south of the east-west ridge on the site. The higher figure will not achieve this and thus is in contradiction not only to these 3 expert reports but the 2108 Draft itself. Why and on what basis has this figure now been increased to 0.65 hectares?

4 The Settlement Boundaries on Plan 4 and 5 are incorrect. As mentioned above, permission for development for 27 houses has been given on the Millpond/A438 site thus effectively expanding the Settlement Boundary to include that area. Thus Plan 4 is wrong and needs to be corrected. Indeed this whole development has been ignored in the Draft. Why one asks?

### **Secondary Objections**

5 Para 3.7 claims that the Draft will address traffic implications of any development but I have serious doubts that School Road can safely carry the increased traffic that any development on the site north of the lane will involve. The lane adjacent to the site cannot be greatly widened but even more serious will be the traffic problem in the area south of the junction with the A438 at the Tarrington Arms. There are serious congestion problems there already.

6 With reference to para 5.22, the proposed 2 m wide footpath will do nothing to improve traffic flow, will in all probability cause more flooding issues and/or cause the loss of the natural habitat hedgerow which the Draft elsewhere is keen to preserve.

7 Flooding in the village is a major issue which cannot be ducked in the way that para 7.2 seeks to ("these matters fall outside the scope of the NDP" ...). Development on the School Road site (an area already regularly flooding) will exacerbate an already serious problem. I note the reference in para 7.11 to the CIL potentially addressing flooding issues but proper development should not need this, in any event uncertain, resource. If it causes flooding it's in the wrong place!

## **Conclusion**

In conclusion I'd like to make a number of points:-

A With reference to the Evidence Base section in Appendix A, there has been grossly insufficient consultation with the village community in this whole NDP process. The one and only Open Day was in Feb 2015 – almost 5 years ago now – at which stage residents were told that any land at Little Tarrington (including of course the Millpond site) could not be considered for development. Subsequently the Core Strategy was changed to include such land but no further Open Day has been held.

B I have mentioned several times the 2018 Draft which was evidence-based and reasonable. No explanation has been given as to why this was withdrawn.

C The nub of the issue is this – that housing on the School Road site is just the wrong place. It has too many access, landscape, heritage and flooding issues. The various planning applications in recent years by the landowner have been always refused on these grounds. It is clear that the village does not want housing there – see the overwhelming number of objections on the Herefordshire Council planning site when views have been called for. By contrast there has been general support for the Millpond development.

D In view of all the above, I find the Draft little short of extraordinary. It is seriously factually incorrect and deeply flawed. It has little chance of success in any referendum. I would advise it be discarded and something both more accurate and evidence-based commenced."

We would appreciate if these objections could be registered as being our response to the draft Tarrington Neighbourhood Plan of October 2019.

Yours sincerely,

Graham & Ann Jones

Graham R Jones

## Latham, James

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 06 November 2020 13:54  
**To:** Neighbourhood Planning Team  
**Subject:** A comment on a proposed Neighbourhood Area was submitted

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| Comment on a proposed neighbourhood plan form submitted fields |  |
|--|--|
| Caption  | Value  |
| Address  |  |
| Postcode   |  |
| First name   | Graeme   |
| Last name  | Forrester  |
| Which plan are you commenting on?                              | P181943/0  |
| Comment type   | Objection  |
| Your comments  | <p>My objections submitted on 21st June 2018, 7th October 2018, 28th November 2018 and 15th August 2019 are still pertinent and I would therefore like them to be taken into consideration. However I would like to add the following comments:- Consultation and Open Days - No community involvement has occurred since early 2015 before Herefordshire Council's Core Strategy was changed to allow Little Tarrington to be included in the NDP. Housing - Apart from the metamorphosis of the phrase 'minimum of six' to 'around six' with reference to the number of houses nothing has changed. The term 'around six' is too vague to be acceptable in connection with such an important matter and leaves open the question of how many houses is this application for. In any case Tarrington has already fulfilled its quota and accordingly there is no need for this contentious and unpopular site to be considered. Graeme Forrester. 6th November 2020</p> |



Historic England

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

Direct Dial: 0121 625 6887

Our ref: PL00626509

26 October 2020

Dear Mr Latham

**TARRINGTON NEIGHBOURHOOD PLAN - REGULATION 16 CONSULTATION.**

Thank you for the invitation to comment on the Tarrington Submission Neighbourhood Plan.

Our previous comments on the Regulation 14 Plan remain entirely relevant that is: *“Historic England has no adverse comments to make upon the plan which we feel takes a suitably proportionate approach to the main historic environment issues pertaining to Tarrington.*

*We commend the commitment in the Plans Vision, objectives and policies to support well designed locally distinctive development that is sympathetic to the character of the area including its rural landscape character, views and green spaces. The recognition of the importance of Historic Farmsteads being sustainably and sensitively converted is also welcomed”.*

Beyond those observations we have no further substantive comments to make.

I hope you find this advice helpful.

Yours sincerely,

P. Boland.

Peter Boland  
Historic Places Advisor  
peter.boland@HistoricEngland.org.uk

cc:



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6888  
HistoricEngland.org.uk





## Latham, James

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**From:**  
**Sent:** 29 October 2020 17:31  
**To:** Neighbourhood Planning Team  
**Subject:** Tarrington NDP Comments Oct 2020  
**Attachments:** NDP Comments Oct 2020.docx

**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 Sirs

Please find attached my comments on the Tarrington Neighbourhood Development Plan for submission. I would like to be informed of the local planning authority's decision.

Kind Regards

Jeanette Forrester



Virus-free. [www.avg.com](http://www.avg.com)

Quote : A draft of the Plan was published for consultation in October 2019, and comments received have been taken into account in preparing this revised version.

A number of residents submitted negative comments in October 2019 which do not appear to have been acknowledged in this document, apart from the change of the phrase “minimum of six” to “around 6” with reference to housing. NB: the document states the NDP is unable to cap the number of houses in its plan.

#### Consultation and Open Days

Quote: Such a partnership approach was supported by 85% of Open Day respondents.

The only Open Days undertaken were on 13/15 Feb 2015 before HC’s Core Strategy was changed to allow the Stock’s site in Little Tarrington to be included in the NDP. No further consultation was undertaken from that date. In fact, the Parish Council disbanded the NDP in, I believe, July 2018 and reformed it containing PC members only and no members of the community. It is inaccurate to state that any effective consultation has taken place with local residents during the span of the NDP. In the opinion of many in this village, the Parish Council has failed to fulfil its responsibility to this community by providing more inclusive and thorough consultation.

A letter sent by residents to the Chairman of the Parish Council in 2018 stated:

“We are concerned that if the irregularities remain unaddressed it will inevitably lead to a draft plan which is detrimental to the village and not in accordance with the core strategy or advice given by HC. This deviation from correct procedure will be apparent to the Examiner at Regulation 16 and is also likely to lead to consternation and the disapproval of the community at large.”

Quote : Further issues were use of the narrow rural lanes by heavy traffic, highway maintenance and flooding. Highway safety and capacity may be a particular concern where schemes give rise to significant traffic movements on the narrow rural lanes. Many of these matters fall outside the scope of the Neighbourhood Development Plan.

The plan does nothing to address the dangers from traffic, including heavy vehicles, accessing School Road either from or onto the A438 with parked cars reducing this to a single lane. Nevertheless, these are precisely the matters which are of the most concern to residents. Indeed, if it is a fact that these critical concerns are outside the scope of the NDP, then the plan itself has no real validity.

Quote: The use of sustainable drainage systems to manage surface water run-off and flood risk .....

Flooding is a real and regular risk in this village. The School Road site proposed has been known for many years to flood, resulting in adverse effects down through the village to the eastern junction with the A438. The plan states that the developer’s CIL money can be used to fund flood defences, but it is widely acknowledged and documented that this School Road site and its impermeable topography is unsuited for development due to this risk.

## Latham, James

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**From:** Jane Foulkes  
**Sent:** 28 October 2020 16:56  
**To:** Neighbourhood Planning Team  
**Subject:** Tarrington draft NDP plan

**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 Madam/Sir,

I am writing again to object to Tarrington's NDP plan. I have written several times previously when invited to do so and I also wrote to Tarrington Parish Council and David Nicholson. I would like all previous correspondence and objections to be taken into account please.

My main objection continues to be that the village residents have not been consulted about the plan and any objections raised have not been taken seriously. It has appeared from the outset that the parish council have been set on a particular course and they have refused to discuss or change their view despite reasonable objections. It has been a protracted and frustrating process and I do not feel that we as residents have been able to be heard. My objections to the plan remain as they were as they have not been addressed.

Yours faithfully,

Jane Foulkes

Sent from [Mail](#) for Windows 10

Our Ref: MV/ 15B901605

T: +44 (0)191 261 2361  
F: +44 (0)191 269 0076

06 November 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  
**Tarrington Neighbourhood Plan Regulation 16 Consultation  
September - November 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: 09 November 2020  
Our ref: 331028  
Your ref: Tarrington 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

**Tarrington Neighbourhood Development Plan – Regulation 16**

Thank you for your consultation on the above dated 28 September 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.

**Tarrington Neighbourhood Development Plan Habitats Regulation Assessment**

7.2. The site allocation distance from the River Frome, may mean that the risk of impact on the River Lugg part of the River Wye SAC is lower than if it was closer, but it does not rule impacts out.

The HRA assessment for the Herefordshire Core Strategy was based on mitigation being provided through the Nutrient Management Plan (NMP). Following the Dutch case ([Joined Cases C-293/17 and C-294/17](#)) there remains reasonable scientific doubt as to whether the Nutrient Management Plan can provide appropriate mitigation. As the River Lugg part of the River Wye SAC is currently failing its conservation objectives for phosphate and the Nutrient Management Plan cannot presently be relied upon for mitigation we would advise that you need to consider potential in combination impacts further.

The recent [People over Wind](#) judgement has confirmed that mitigation cannot be taken into account at screening stage of the HRA process. The NMP is a form of mitigation. Therefore if the NMP is being relied upon, then the project must proceed to appropriate assessment. Mitigation can be considered at AA stage.

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

Yours sincerely

*Gillian Driver*

Ms Gillian Driver  
Lead Adviser  
Land use planning – West Midlands Area Team

## Latham, James

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**From:** Rob Nayler  
**Sent:** 08 November 2020 21:42  
**To:** Neighbourhood Planning Team  
**Subject:** Tarrington Neighbourhood Development Plan  
**Attachments:** Tarrington-NDP-comment NAYLER 24-11-2019.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.

### To Whom It May Concern:

My original comments regarding Tarring NDP are attached for you to take into consideration. Apparently, concerned individuals in Tarrington feel that their comments are not being seriously considered by the parish council, and that they must be repeated to the relevant decision making authorities.

R. Nayler

Begin forwarded message:

**From:** Ann Wessel  
**Subject:** Fwd: Tarrington Neighbourhood Development Plan  
**Date:** 27 October 2020 at 08:22:32 GMT  
**To:** Rob Nayler

Sent from my iPhone

Begin forwarded message:

**From:**  
**Date:** 26 October 2020 at 22:38:13 GMT



**To:**  
**Subject: Tarrington Neighbourhood Development Plan**

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You may recall that in October last year residents were invited to comment on the draft NDP document and many of us did so. These comments went to the Parish Council and David Nicholson, consultant. An online Zoom meeting was held by them on 1<sup>st</sup> June to review the comments made. I did not view that meeting but to my knowledge the only alteration made to the draft document as a result of the comments was the change from “a minimum of six” to “around six”. It is worth noting that those comments by residents were not forwarded to Herefordshire Council Neighbourhood Planning Department, but were seen only by the Parish Council and its consultant.

As you may have seen on HC notices in the village, residents are invited to comment on the current plan during the consultation period (which ends on 9 November) when it will be assessed by the examiner at Regulation 16. The examiner will be looking at the evidence provided that the community has been consulted and involved at all stages of the plan.

Therefore, to ensure that our comments are seen by the examiner, it will be worthwhile for those of us who submitted them previously in Oct/Nov '19, to resubmit them now, so that his decision can be fully informed.

If you wish to make representations or comment you can do so by:

**Website:** using the online comment

at: <https://www.herefordshire.gov.uk/neighbourhood-planning/>

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

**Post:** Neighbourhood Planning Team, Planning Services, PO Box 4, Hereford HR1 2ZB

**These should be received no later than 9 November 2020**

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. The NDP is now with Herefordshire Planning Department and can be viewed on the website.

Our NDP has been a distressing and protracted process for all, but it is now in its final stages, when the views and ultimately the votes of residents will be important for the future of Tarrington.

Thank you  
Jeanette Forrester

# Tarrington Neighbourhood Development Plan 2011-2031

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## Public Consultation:

**MONDAY 14 OCTOBER – MONDAY 25 NOVEMBER 2019**

## Comments form

Comments must be made in writing and include your name and address. Please make comments as specific as possible, quoting the relevant policy or paragraph number(s). All comments will be publicly available.

Additional copies of this form can be downloaded and printed from the Tarrington Parish Council website at <https://tarringtonpc.org.uk/neighbourhood-development-plan/>, requested from the Parish Clerk by email to [tarrington.pc@btinternet.com](mailto:tarrington.pc@btinternet.com) or from Janette Ward by telephoning 01432 890532, or collected from:

- the Tarrington Arms
- the Lady Emily Community Hall
- the parish Church
- Hereford Customer Services, Blueschool House, Blueschool Street, Hereford
- Ledbury Library, The Master's House, St. Katherines, Ledbury.

### Send your comments:

- by hand to the letter box at the Lady Emily Community Hall
- by email to the Parish Clerk at [tarrington.pc@btinternet.com](mailto:tarrington.pc@btinternet.com)
- by post to Tarrington Parish Council, c/o Lady Emily Community Hall, School Road, Tarrington, Herefordshire HR1 4EX.

**All comments must be received by 5 p.m. on Monday 25 November 2019.**

### Your details:

|                 |                      |
|-----------------|----------------------|
| <b>Name:</b>    | R Nayler, M A Wessel |
| <b>Address:</b> |                      |

**Please give us your comments overleaf.**

**Please give us your comments below.**

| Which part of the Plan are you commenting on? Please tell us the page number, paragraph number, or policy | Are you supporting, objecting or just making a comment? | Comments and/or suggested changes  |
|---|---|--|
| Table 1 paragraph 5.3, page 16.   | OBJECTION   | This table does not account for the housing to be built south of the Millpond. This needs to be re-written to account for these 27 houses.   |
| Paragraph 5.5 page 16.  | OBJECTION   | This reads a "minimum" six houses. Since the figure is uncapped, it leaves the scope wide open to build as many houses as a future developer sees fit, or can get away with. I thought the recommendation by the PC-funded consultant C Tinkler, was originally for a MAXIMUM of six houses (you will have to check the facts yourself)... |
| Paragraph 5.5 page 16.<br>CONTINUED   | OBJECTION   | .....Given the existing number and weight of Parishioner's objections to building in this field adjacent to School Road, the PC needs to take these factors into account and re-write the policy, setting the number of dwellings to ZERO. I.e, no development in this area.   |
|   |   |  |

**Do you have any general comments?**

OBJECTION: the development adjacent to the Millpond has not been sufficiently addressed. This is a serious and extraordinary omission, and it not clear why this has occurred. The entire draft NDP needs to be re-written fully taking into account the Millpond development. The issue relating to various settlement boundaries is a complete, administrative irrelevance when the proximity of the Millpond houses to the village is considered. Any prevarication not to include the Millpond development as a significant contribution to the plan should be dismissed, or treated with suspicion.

OBJECTION: There has been a very passive approach to disseminating the draft NDP to the villagers. Leaving copies of the document in various public places, telling people it is available, and then hoping they will go and view it, is a very low-profile, passive approach, and unlikely to reach many people. Since the document is not Classified information, a more proactive approach to engaging the village and disseminating the document should be adopted. For example, another public consultation and awareness raising campaign.

We have also seen a significant number of objections from other villagers discussing matters such as traffic, and flooding, and we wholeheartedly support them.

**Thank you for your comments.**



CANALSIDE HOUSE, BREWERY LANE, SKIPTON, NORTH YORKSHIRE, BD23 1DR  
TEL: 01756 797501 EMAIL: INFO@RURALSOLUTIONS.CO.UK WEB: WWW.RURALSOLUTIONS.CO.UK

REGISTERED IN ENGLAND NO. 6839914 VAT REGISTRATION NO. 972 8082 90

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9<sup>th</sup> November 2020

Neighbourhood Planning Team  
Planning Services  
PO Box 4  
Hereford  
HR1 2ZB

Dear Sir/Madam,

## **REGULATION 16 CONSULTATION: DRAFT TARRINGTON NEIGHBOURHOOD DEVELOPMENT PLAN – ON BEHALF OF THE STOKE EDITH ESTATE**

We write to you on behalf of The Stoke Edith Estate in respect to the content of the draft Tarrington Neighbourhood Plan (TNP) July 2020, in particular the proposed allocation of land at School Road for housing development within the draft TNP. We submit the following formal responses on the Regulation 16 draft Tarrington Neighbourhood Plan.

### **Context**

The Stoke Edith Estate have actively promoted the land at School Road for housing development throughout the Neighbourhood Development Plan process and consider this land to be the most suitable land available within the Parish for housing development. The Estate are committed to the suitable development of this land for housing development to the benefit of the Parish. This desire has culminated in the submission of a planning application (reference 181943/O) that is currently being considered by Herefordshire Council.

The current application (reference 181943/O) seeks outline permission for a mix of 9 dwellings, firmly considered to be the optimum number in the current land area that will benefit the long term viability and vitality of the Parish.

As part of this application the Estate has worked to respond to the concerns and original objections to the previous application, and by reducing the original number of proposed dwellings from 15 to 9, has overcome concerns relating to landscape impact, heritage and highways. The current scheme plan, setting out the indicative layout and landscaping proposal, is considered to be appropriate by the Council, as confirmed by the case officer and through a number of consultee comments including heritage and landscape comments. Dialogue continues with the highway's officers and public rights of way team to ensure that the upgrade of public footpath TR3 can be achieved and adopted providing a wider benefit to the local community. Considerable consideration has been given to other off-site pedestrian improvements.

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These representations are made primarily in response to draft TNP Policy TAR8. The Estate continues to support the allocation of the School Road site within the Neighbourhood Plan, but they are keen to ensure that a viable scheme can be delivered and that the criteria attached to the draft policy are fair and reasonable, in light of the comments that have been received from statutory consultees through the now advanced planning application.

### Housing Requirement

Policy RAI (Rural housing distribution) of the Herefordshire Core Strategy requires the delivery of 1,870 dwellings within the Hereford Housing Market Assessment between 2011 and 2031; this includes within the parish of Tarrington a **minimum** housing growth target of 18%.

We note from the updated housing trajectory set out at paragraph 5.3, Table 1 of the draft NLP that based on recent consents, the housing requirement at April 2019 is for an additional 3 dwellings, as a minimum. The updated housing figures note that there has been five housing completions in the village, and 35 dwellings with planning consent.

| Number of new houses required to 2031 (min) | Housing completions (net) 2011 2019 | Housing commitments (net) as at 1 April 2019 | Planning permission LPA ref 184506 | Housing remaining to be delivered |
|---|-------------------------------------|--|------------------------------------|-----------------------------------|
| 43  | 5                                   | 25   | 10                                 | 3                                 |

*Table 1: Housing Requirements, Tarrington Neighbourhood Area 2011-2031.*

We previously raised in our representations to the NLP in November 2019 that scrutiny of these figures reveal that five of the housing commitments that make up the current supply in the Parish relate to a barn conversion permission at Alders End Farm dating back to 2009. There is written evidence to indicate that this permission has been implemented. However, the land is held in trust which perhaps indicates why nine years on from detailed permission having been granted, no work has progressed. This brings into question whether this commitment can be relied upon for delivery over the next five years or even over the plan period. We acknowledge that the site has recently been marketed for sale, however, whether the site will be brought forward for redevelopment or retained as a single family home is yet to be known.

For a site to be regarded as deliverable, Annex 2 of the NPPF explains that there must be 'a realistic prospect that housing will be delivered on the site within five years'. Deducting this site brings the residual minimum requirement to 8.

It is important to remember that CS policy RAI sets **minimum targets**. There is strong case law now on this area of Planning. A minimum target is exactly that – the lowest figure. Given the global pandemic it is also now important to ensure that

there is a healthy stock of housing sites, when working on the basis that not all of the commitments will be delivered by the end of the Plan period.

The above figures clearly support the need for a housing allocation within the Parish as part of the draft Neighbourhood Plan and it is agreed that the site at School Road is the only suitable site within the Parish. As previously stated, as landowners, the Estate confirms that the site is available for development and supports the proposed allocation. The land is also available to meet any potential shortfall in housing numbers for the Parish throughout the Neighbourhood Plan period, upon adoption.

### Housing Delivery

As set out in draft Policy TAR5, the site at School Road is the only site presented as a formal housing allocation with the remainder of the housing delivery expected to come forward either via the existing commitments or windfall sites (of which there is no guarantee).

The Estate supports the allocation of this site and agree that it is the only suitable location within the parish for accommodating housing development. The development of this land will accord with draft policy TAR5 of the TNP.

The allocation proposed at School Road is acknowledged as having capacity **for around** six new dwellings. This has been amended from the previous version of the NLP which set out **a minimum** of six dwellings.

Table C of the Consultation Statement (August 2020) that informs the draft NLP explains how this alteration to the wording has come about, by reference to the reduced housing need in the village.

At the time the draft Plan was prepared, the housing delivery position showed a shortfall of six units in meeting the minimum strategic requirement, taking into account a reasonable windfall allowance. To demonstrate the requirement could be met it was necessary for policy TAR8 to specify a minimum six units. This is no longer the case because the housing delivery position has now improved. In these circumstances, the policy should now require “around” a given number of dwellings. This will enable a design-led solution to come forward which is appropriate in terms of character whilst ensuring the effective use of land.

However, as set out above in these representations, the delivery of the committed sites is not guaranteed, as demonstrated by the protracted nature of some sites to date, and the further impact that Covid-19 may play in delaying other sites from being developed.

The Estate considers that the alteration to the text is ambiguous. By setting a **minimum** number of dwellings accords with the wording in both Core Strategy RA1 as well as the NPPF, which does not impose a cap on sustainable development.

### Housing size, type and tenure

In rural areas of the Hereford Housing Market Area, the Local Housing Market Assessment<sup>1</sup> (LHMA) shows that the majority of open market housing will need to have either 2 or 3 bedrooms (23% and 54% respectively of the total requirement). Similarly, the TNP states in paragraph 5.13 that a Resident Survey (undertaken by the Steering Group as part of the evidence base) identified family homes (2-4 bedrooms) as being required within the Parish (78% of respondents).

The current planning application (reference 181943/O) as proposed at School Road for 9 dwellings proposes a mix of 2-4 bedroom dwellings, including a mix of both 2 and 3 bedroom properties (22.2% and 55.5% respectively) in accordance with the requirements set out within the LHMA. The mix of housing as proposed in this application will accord with draft Policy TAR7 of the TNP.

### Land at School Road Tarrington

The allocation of the site and the aspirations for the land are set out within draft Policy TAR8 of the TNP (page 22) and commentary on the policy provided in paragraphs 5.14-5.24. The policy confirms that the site is suitable for the development.

As noted above the draft policy has been amended from **a minimum** to **around** six. As set out above, we consider that the former wording is more robust, reflects the language used in both the Core Strategy and National Guidance and removes any ambiguity. There should be no cap on sustainable development and the final amount of development that is realised on this site will be dictated by the development parameters and any future reserved matters application.

The draft policy advises that development of the land will be supported where seven criteria can be met. The Estate are supportive of the draft allocation, however, they are keen to ensure that the application of site based criteria do not result in any future development from becoming unviable.

The Estate has been promoting the site at School Road for a number of years, and through two planning applications the scale of the current proposal at 9 dwellings is now deemed appropriate. The draft site plans submitted with this application have sufficiently demonstrated to the Council that there will be no impact on heritage or the landscape, and the landscape works proposed are sufficient. The Estate are keen to ensure that the site criteria are not overly prescriptive, and in excess of what has been deemed appropriate by the Council to date,

Each criterion is taken in turn below.

- I. Dwellings are provided which contribute to meeting the latest assessment of housing needs including house type and size

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<sup>1</sup> Herefordshire Local Housing Market Assessment 2013 (Herefordshire Council)

Estate Comment: As noted above the mix of dwellings as proposed in the current planning application accords with the requirements for family dwellings as identified within both the findings of the Residents Survey and the mix of 2 and 3 bedroom dwellings as identified within the aforementioned Local Housing Market Assessment (Herefordshire Council, 2013). We agree that this mix is the most suitable to maintain the vitality of the Parish in the coming years.

## **2. Topography, neighbouring heritage assets and views are respected**

Estate Comment: The size and scale of the development at School Road, now proposed, has responded directly to concerns raised with regarding the potential impact upon heritage assets with the removal of the 6 dwellings in the northern half of the field. We understand that this has removed any potential objection by the Council's heritage officer which in turn responds directly to the above criteria.

## **3. Traditional building materials including stone and timber are specified**

Estate Comment: Our previous comments noted that this criteria requests stone and timber materials to be used. Paragraph 5.20 of the supporting text recognises that the choice of materials will be important in order that the scheme reflects local character.

The current planning application (reference: 181943/O) seeks outline consent and does not specify a specific choice of materials, The submitted Design and Access Statement does however state that the materials to be used for the proposed houses will follow those found locally. Materials will be dealt with at future Reserved Matters stage.

Having considered the specific requirement for stone and timber further, it is considered that this is too prescriptive and does not reflect the varied mix of materials and design found locally in Tarrington. For example, the properties on Church View are constructed of red brick, and therefore stone and timber would not reflect the design of the nearest properties. Whilst the Estate are not opposed to the use of good quality, locally sourced materials, that bed the development into its setting, the commercial reality and viability of the scheme must be taken into consideration.

The Estate has undertaken some cost comparisons, informed by a Quantity Surveyor. This is attached at Appendix I. These calculations demonstrate that a stone and timber scheme has the potential to add a significant cost increase to the construction of the 9 properties. A natural stone external wall with backing blocks costs approximately £200 per sqm. By comparison, a brick external wall is £60 per sqm. Taking this into account, based on an average 3 bed dwelling having a gross floor area of 138sqm, a stone built scheme would add an additional circa £190,000 to the development costs. Earned incomes in Herefordshire are generally lower than in most parts of England: if the new housing stock for Tarrington is to be available for local people then it should not be over-specified for the local market.



Herefordshire is not in the Cotswolds whether aesthetically or financially. Given the fact that the UK is facing economic uncertainty as a result of Covid-19, we feel that the design specifics should not be so rigorously controlled.

The Estate supports the requirement for a high-quality development that integrates with the existing vernacular and materiality of the Parish, and therefore suggest that this criteria be amended as follows:

*The choice of materials should reflect the local character, and consider the use of stone and timber where appropriate.*

- 4. Provision of linear hedgerow to the western and northern boundaries of the site and of strategic landscaping outside these boundaries which protects the rural character of public right of way TR3**

Estate Comment: The Estate objects to the need for such strategic landscaping outside the western and northern boundaries of the site

In response to application LPA ref:181943 the landscape officer (in comments dated 11<sup>th</sup> September 2018) supports and welcomed the reduced number of properties. In their comments it recommends revisions to the northern boundary to read as a linear hedgerow OR to introduce orchard planting (i.e. strategic landscaping). There is no reference or requirement in the landscape officer's comments with regards to the western boundary.

Within the Consultation Statement at page 26, the Parish Council acknowledges that these landscape measures are 'desirable' and therefore the criteria cannot make these a requirement.

The landscape masterplan for the current planning application produced by Portus and Witton (see Appendix 2) proposes new evergreen rich native tree and shrub planting to thicken the existing northern boundary with Brook House, as well as new native species hedgerow both around the proposed reduced development area and within the development site itself.



Figure 1: Proposed Landscape Masterplan

It is still the Estate's opinion, and that of their relevant professional advisors, that the landscape masterplan, and additional planting indicated, are appropriate to mitigate the landscape impact of the current proposed scheme.

The further request for hedgerow and tree planting to the western boundary has not been requested by the landscape officer. This is therefore deemed to be unnecessary. Furthermore, the landscape officer suggests hedgerow planting OR orchard (strategic) planting but not both.

The Estate's landscape architect advisors have confirmed that orchard planting, as referenced in paragraph 5.17, would add limited benefit to the visual effects of the proposed development. Orchard trees are typically spaced out to allow growth and as such would add minimal screening opportunities to the proposed development.

For this reason, the Estate considers that the landscaping details provided in the aforementioned landscaping masterplan and the reduction of the overall developable area is sufficient mitigation for the proposed development. Landscape design will be a matter for any future Reserved Matters application and therefore this can be further agreed with the Local Authority at a later point in time.

The current proposal does, however, seek to upgrade the existing public right of the way (TR3) to the west of the site. The council's PROW officer has confirmed that the potential to upgrade the surface of this PROW would be viewed favourably and

could provide a secondary pedestrian route for any pedestrian who does not want to walk along School Road.

The surface of this path is currently being discussed and reviewed. There is a need to find a solution that balances the requirements of the Council's highway department to have a surface material that is suitable for adoption, versus a surface material such as a Hoggin path which is more in keeping with the rural setting.



*Figure 2: Example of proposed Hoggin footpath surface*

This upgrade will improve connectivity with the site and village facilities to the north, including the Tarrington Arms and bus stops on the A438. Similarly, the upgrade will provide greater connectivity from the north of the village the Lady Emily Community Hall to the west of the site.

In summary of this point, it is considered that it should be made entirely clear that the landscape requirements set out in criteria 4 are aspirational, and details of additional landscaping will be agreed through the decision making process, to ensure that fair and proportionate mitigation measures are delivered.

- 5. Vehicular access is taken from School Road, with the existing hedgerow translocated to the rear of visibility splays unless an alternative frontage treatment is agreed.**

Estate Comment: Vehicular access to the site is taken from School Road as required by the above. It is agreed that this is the most suitable way to access the site. The details of the planting scheme shall be agreed as part of the detailed Reserved Matters planning application process. It is noted that the criteria would wish to see the translocation of the existing mature hedgerow. It should be noted that to

translocate a mature hedgerows such as this is not likely to be possible. Whilst the criteria invites an alternative landscape treatment to be agreed, we question the inclusion of this. We suggest the criteria be amended as follows:

*Vehicular access is to be taken from School Road with appropriate visibility splay retained. Details of the frontage and landscape treatment should be agreed with the LPA.*

6. **Safe and suitable access for all users is provided to village facilities and to assist integrated transport, to include:**
  - provision of a 2m wide footway along School Road between the watercourse in the east and The Vine in the west; and
  - upgrading of public right of way TR3 to provide access to the bus stops on the A438; and
  - consideration of the feasibility of providing a footway link by footbridge to the north, connecting to School Road.

Estate Comment: As set out in the Consultation Statement it is acknowledged that TARI3 designates highway grass verges as Local Green Spaces and therefore it is not deemed appropriate to formalise these footpaths through the provision of new surfaced paths.

Provision is made for safe roadside passage along the verge, the current safe means of passage for pedestrians within the village along School Road. The verges can be preserved and function as they do at present, offering off road pedestrian use. This is common place in rural villages and there is no requirement for hard standing in place of the grass. The increase in footfall anticipated as a result of the housing development is not going to harmfully impact the verges over and above the level of foot traffic that they currently experience.

The Estate supports the second bullet point above at reference 5 and discussions are ongoing regarding the upgrade works to TR3 and refuge areas.

However, the Estate objects to the inclusion of the third bullet point which is unnecessary., The existing proposed development of 9 dwellings is already subject to a number of criteria set out by the draft policy that will inevitably add to the cost of developing this site, for e.g. specific use of materials, additional landscaping over and above that required to mitigate the impact of the development. Considering the feasibility of a footbridge adds a further layer of cost to a future developer of what is a very modest scheme. The footbridge would incur further costs and potential complications from involving third party land. The deliverability of this is therefore unknown.

This criterion has been added without any consultation or dialogue with the Estate as to its feasibility and therefore it does not seem appropriate for this to be included within the draft policy at this late stage.

- 7. provision of a buffer zone within the east of the site which serves to protect the brook and bankside habitat, enable sustainable drainage and includes provision of a footway link to the north, connecting to School Road.**

Estate Comment: Whilst the application (reference I81943/O) as proposed seeks outline planning permission, an indicative site plan has been included to show how the site may be developed. The proposed plan (shown in Figure 1 and appended to this document) does not include a buffer zone to the east as it is considered that such an area would push development to the west of the site, on higher ground that would increase any perceived visual harm. That said, measures would be implemented that would guarantee the protection of the brook and bankside habitat and the development would seek to enhance the biodiversity of the area. The development as proposed includes the provision to upgrade the public right of way to the west of the site which will improve connectivity to the east and west bound bus stops on the A438.

### Policy TAR8 Summary

The Estate supports the proposed allocation of the site at School Road. However, it is considered that a number of the criteria as currently drafted have the potential to render the development unviable as a result of increasing development costs. The points of concern which are addressed within the above section and we would be grateful that these points be given due consideration during this part of this consultation process.

### Settlement Boundaries

We note that the TNP proposes to define village limits into which development should be steered (draft Policy TAR 6 on page 18). The proposed village limits includes the proposed developable area at School Road which covers an area of 0.65 ha. It is acknowledged that the proposed village limits very much reflects the area proposed for development as set out in the current planning application (reference I81943/O) and the Estate supports this important inclusion within the TNP.

### Summary

The above provides comments on behalf of The Stoke Edith Estate in response to the draft Tarrington Neighbourhood Plan. In summary:

- The Estate acknowledges the minimum need for new residential dwellings in the parish over the plan period. It should be clear that this is a minimum requirement.

- It is clear that a housing allocation is required to meet this identified need.
- The Estate supports the allocation of the site at School Road and agree that it is the only suitable location within the parish for accommodating housing development.
- For the avoidance of doubt, the housing allocation at School Road, as set out in Policy TAR8 should revert back to a minimum for 6 dwellings, rather than stating around 6 dwellings.
- There is no cap on sustainable development and no certainty that all of the current commitments will come forward.
- The site can accommodate a mix of dwellings required by the draft TNDP.
- The Estate supports the use of high quality materials that reflect the local area but consider that the specific reference to stone and timber should not be imposed.
- The Estate objects to the need for strategic landscaping outside the western and northern boundaries of the site. Consultation comments in response to the current planning application has not requested landscape works on the western boundary.
- A landscape masterplan has been prepared as part of the current planning application which confirms that sufficient landscaping can be provided within the proposed development site that can mitigate any perceived harm to the landscape setting.
- The current application proposes an upgrade to the existing PROW to the west of the site which will improve connectivity with the site and village facilities to the north including the Tarrington Arms and bus stops on the A438. Similarly, the upgrade will provide greater connectivity from the north of the village the Lady Emily Community Hall to the west of the site (page 20, paragraph 5.22).
- Translocating the hedge is not a viable option given the maturity of this hedgerow. The landscape treatment of the frontage of the site along School Road shall be agreed in consultation with the Council at Reserved Matters stage.
- Reference to the footbridge to the east of the site should not be introduced at this late stage of the plan process, and should be removed. The viability and deliverability of this foot link are unknown and uncertain.
- The Estate supports the inclusion of the site area within the proposed village limits.

The Stoke Edith Estate is committed to delivering a viable, high-quality residential development of an appropriate size at School Road, Tarrington. Commentary is provided on behalf of the Estate on the draft Tarrington Neighbourhood Plan and we trust these comments will be duly considered when the TNP is examined.

We trust that the above information shall be given due consideration as part of the emerging TNP. If required the landowner, Mr Rupert Foley, would be only too pleased discuss the above points further with the Parish Council and Neighbourhood Plan Team.

We look forward to hearing from you on these representations now submitted on the draft Tarrington Neighbourhood Plan.

Yours sincerely

**Kate Girling**

Senior Planner

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Enc. Appendix 1 Materials costings

Appendix 2 Landscape Masterplan



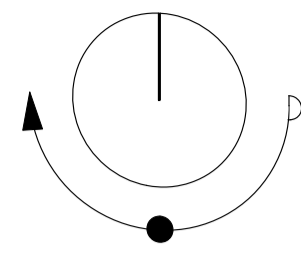
## APPENDIX 2 – MATERIALS COSTINGS

### **Stone external face to dwellings**

(Based on 3 bedroom detached house)

|   |                    |         | £                |
|---|--------------------|---------|------------------|
| Natural stone external wall area  | 138 m <sup>2</sup> | 175.00  | 24,150.00        |
| Backing blocks to stonework, 75mm thick                                   | 138 m <sup>2</sup> | 25.00   | 3,450.00         |
| sills   | 8 m                | 95.00   | 760.00           |
| lintels / arches  | 13 m               | 120.00  | 1,560.00         |
| <b>Less: comparative cost in brickwork</b>                                |                    |         |                  |
| Facing brick external wall area   | 138 m <sup>2</sup> | 60.00 - | 8,280.00         |
| sills   | 8 m                | 20.00 - | 160.00           |
| lintels / arches  | 13 m               | 35.00 - | 455.00           |
| Typical extra cost of stone outer face construction <u>(per dwelling)</u> |                    |         | <u>21,025.00</u> |





### Planting Schedule - Typical Species

**Mix A - Boundary Planting**  
An evergreen-rich mix of native trees and shrubs, planted at 1m centres

| %  | Species            | Common Name | Specification |
|----|--------------------|-------------|---------------|
| 10 | Cornus sanguinea   | (dogwood)   | 60-80cm high  |
| 60 | Crataegus monogyna | (hawthorn)  | 80-100cm high |
| 10 | Ilex aquifolium    | (holly)     | 60-80cm high  |
| 10 | Quercus ilex       | (holm oak)  | 80-100cm high |
| 10 | Taxus bacata       | (yew)       | 60-80cm high  |

**Mix B - Specimen Trees within Native Planting**

| Species        | Common Name         | Specification                             |
|----------------|---------------------|---|
| Acer campestre | (field maple)       | 10-12 cm girth, 3-3.5m high, Selected Std |
| Prunus avium   | (wild cherry)       | 10-12 cm girth, 3-3.5m high, Selected Std |
| Tilia cordata  | (small leaved lime) | 10-12 cm girth, 3-3.5m high, Selected Std |
| Quercus ilex   | (holm oak)          | 10-12 cm girth, 3-3.5m high, Selected Std |
| Quercus robur  | (pedunculate oak)   | 10-12 cm girth, 3-3.5m high, Selected Std |

**Mix C - Street Trees**

| Species                         | Common Name     | Specification                              |
|---------------------------------|-----------------|--|
| Betula pendula                  | (silver birch)  | 14-16 cm girth, 4-6m high, Extra Heavy Std |
| Carpinus betulus                | (hornbeam)      | 14-16 cm girth, 4-6m high, Extra Heavy Std |
| Malus Evereste                  | (crab apple)    | 14-16 cm girth, 4-6m high, Extra Heavy Std |
| Prunus x subhirtella Autumnalis | (autumn cherry) | 14-16 cm girth, 4-6m high, Extra Heavy Std |
| Sorbus aucuparia                | (mountain ash)  | 14-16 cm girth, 4-6m high, Extra Heavy Std |

**Mix D - Gardens Trees**

| Species         | Common Name    | Specification              |
|-----------------|----------------|----------------------------|
| Malus domestica | (eating apple) | 1.5-2m high, Half Standard |

**Mix E - Native Woodland Planting Mix**  
A native-species mix of trees and shrubs (at a ratio of 1:8):  
TREES: 1.2-1.5 m.ht. All trees to be random spaced at approx. 3m centres

| % | Tree Species     | Common Name       | Specification              |
|---|------------------|-------------------|----------------------------|
| 4 | Acer campestre   | (field maple)     | feathered, 1.2 - 1.5m high |
| 3 | Malus sylvestris | (wild crab)       | feathered, 1.2 - 1.5m high |
| 4 | Quercus robur    | (pedunculate oak) | feathered, 1.8 - 2.0m high |

**UNDERSTOREY SHRUBS:** Transplants randomly planted on a 1m grid

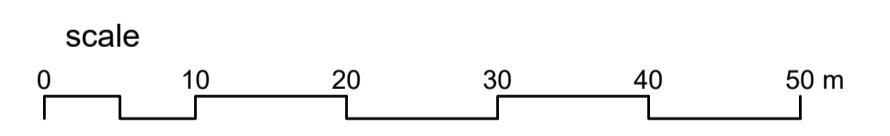
| %  | Tree Species     | Common Name    | Specification |
|----|------------------|----------------|---------------|
| 24 | Ilex aquifolium  | (holly)        | 60-80cm high  |
| 20 | Cornus sanguinea | (dogwood)      | 60-80cm high  |
| 20 | Corylus avellana | (hazel)        | 60-80cm high  |
| 10 | Rosa canina      | (dog rose)     | 60-80cm high  |
| 15 | Viburnum opulus  | (guelder rose) | 60-80cm high  |

**Mix F - Native Species Hedgerow**  
HEDGING: Transplants planted in double staggered rows @ 5 plants per metre

| %  | Species               | Common Name   | Specification |
|----|-----------------------|---------------|---------------|
| 10 | Acer campestre        | (field maple) | 80-100cm high |
| 10 | Corylus avellana      | (hazel)       | 80-100cm high |
| 60 | Crataegus monogyna    | (hawthorn)    | 80-100cm high |
| 10 | Ilex aquifolium       | (holly)       | 60-80cm high  |
| 5  | Lonicera periclymenum | (honeysuckle) | 60-80cm high  |
| 5  | Rosa canina           | (dog rose)    | 60-80cm high  |

**KEY**

- Proposed tree
- Proposed native hedge
- Existing trees & vegetation
- Grass
- Existing vegetation to be removed
- Existing contours (1m intervals)
- New native planting



**REVISIONS:**

| Rev   | Description                 | Date     |
|-------|-----------------------------|----------|
| Rev - | First Issue                 | 30.01.17 |
| Rev A | Amended drawing notes       | 01.03.17 |
| Rev B | Specimen Tree Mix B amended | 05.03.18 |
| Rev C | Revised housing layout      | 17.10.18 |
| Rev D | Tree planting amended       | 22.10.18 |
| Rev E | Proposed hedgerow extended  | 30.10.18 |

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|  |       |    |         |      |   |     |
|--|-------|----|---------|------|---|-----|
| client<br><b>Stoke Edith Estate</b>  |       |    |         |      |   |     |
| project<br><b>Land Adjacent to Church View, Tarrington</b>                               |       |    |         |      |   |     |
| title<br><b>Landscape Masterplan</b>   |       |    |         |      |   |     |
| © The contents of this drawing are the copyright of Portus + Whitton Landscape Ltd. 2017 |       |    |         |      |   |     |
| scale  | 1:500 | A1 | Jan '17 | 1470 | L | 1 E |
| date of issue<br><b>PLANNING ISSUE</b>   |       |    |         |      |   |     |



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

From Herefordshire Council Strategic Planning Team

Name of NDP: Tarrington- Regulation 16 submission draft

Date: 5/11/20

| <b>Draft Neighbourhood plan policy</b> | <b>Equivalent CS policy(ies) (if appropriate)</b> | <b>In general conformity (Y/N)</b> | <b>Comments</b>  |
|--|---|------------------------------------|--|
| Policy TAR1: Sustainable Tarrington    | SS1; SS6; OS2; SC1; LD1; LD2; LD3                 | Y                                  |  |
| Policy TAR2: Natural environment       | SS6; LD1; LD2; LD3; SD3; SD4                      | Y                                  | <p>Though not an issue of conformity as such, much of the criteria in this policy serve to echo its equivalent already in the Core Strategy. It does not supplement or tailor to address more localised issues unique to Tarrington.</p> <p>It could therefore be questioned whether its inclusion as currently drafted is strictly necessary, when equivalent policy in the Core Strategy covers the issues as effectively.</p> |
| Policy TAR3: Historic environment      | SS6; LD4  | Y                                  |  |
| Policy TAR4: Building design           | SS1; SS4; SS5; RA6; MT1; LD1; LD2; LD3; E1; SD1   | Y                                  | <p>See comment on TAR2.</p> <p>Policies of this type could be better tailored to the neighbourhood area by providing some examples of locally distinctive design features and/or materials that might be encouraged.</p>   |

|  |  |   |                      |
|--|--|---|----------------------|
| Policy TAR5: Housing delivery                  | SS2; RA2;<br>RA3; RA4;<br>RA5                  | Y |                      |
| Policy TAR6:<br>Settlement boundaries          | RA2; RA3;<br>RA4; RA5                          | Y |                      |
| Policy TAR7: Housing size, type and tenure     | H1; H3   | Y | See comment on TAR2. |
| Policy TAR8: Land at School Road, Tarrington   | SS4; SS6;<br>RA5; H3;<br>MT1; LD1;<br>LD3; SD3 | Y |                      |
| Policy TAR9:<br>Employment development         | SS5; RA5;<br>RA6; E2; E3                       | Y |                      |
| Policy TAR10:<br>Communications infrastructure | SS5; E1  | Y |                      |
| Policy TAR11:<br>Renewable energy              | SS6; SD2                                       | Y |                      |
| Policy TAR12:<br>Transport                     | SS4; MT1                                       | Y |                      |
| Policy TAR13: Local Green Space                | OS2  | Y |                      |
| Policy TAR14: Green infrastructure             | LD3  | Y |                      |
| Policy TAR15:<br>Community facilities          | SC1  | Y |                      |