

Objections to Bristow NDP Regulation 16

Alison & Ivor Stemp and children

Objections to:

Regulation 16 plan stage

**Bridstow Parish Council Neighbourhood Development Plan (NDP),
submitted to Herefordshire Council on 21 January 2021.**

The consultation runs from 3 February 2021 to 17 March 2021.

The NDP for the Parish of Bridstow proposes that the bulk of the housing development is focussed around the Buckcastle Hill area of Bridstow. This area already has planning permission for 8 houses on the site at Littlefields, almost directly opposite one of the proposed sites at Cotterells Farm. The two sites together would constitute a major development. The proposed site at Oaklands would also back onto the other side of the Littlefields development further creating a major development in this area.

The whole of this area still falls within the AONB and the Cotterells site is grade 2 farm land, currently providing very good grazing land.

These developments represent a 65% increase in housing in this area, which is not only out of proportion but would locate the new houses and the people living in them at the greatest distance from the Bridstow village core and 'hub' of school, hall and church and in the case of the Cotterells site outside of the existing settlement boundary.

This increase in housing density in the Buckcastle Hill area is at odds with the NDP's own favoured Option 2 (para 3.41)

BR1 states:

Development should not harm the character or scenic beauty of the landscape, its wildlife or cultural heritage of the Wye Valley AONB and these should be conserved and enhanced. Planning permission will be refused for major development unless there is a proven public interest, no viable alternative sites are available to accommodate this development elsewhere, and its environmental effects can be mitigated to a satisfactory degree.

There are no exceptional circumstances, as outlined in **National Policy Planning Framework (NPPF), para 172**, to suggest this major development of this area is necessary. Indeed the current plan proposes an excess of the housing target for Bridstow. All the proposed sites on Buckcastle hill could be removed and the Parish housing target would still be met.

The suggestion in Para 8.21 of the Bridstow NDP that proposed development at the Cotterells should include “a signature building reflecting a gatehouse should be provided at the entrance to the development” also demonstrates that the development would be wholly out of keeping with the rural character of the village of Bridstow and this AONB

It is well recognised that the highways safety in this area is extremely problematic.

BR12 states:

Proposals will not lead to a significant increase in the volume of traffic travelling through villages within the Parish or on roads that do not have sufficient capacity.

It also states

A transport assessment will be required in accordance with policy BR12 to assess the impacts of development on the highway and mitigation be identified if required. It should show, in particular, that any impact, on the narrow section of highway by Rock Cottage, including after any mitigation measures, will not be classed as severe.

The plan itself acknowledges the following issues:

- this area is not served by any footpath along its roads
- residents of both Claytons and Buckcastle Hill travelling towards Ross-on-Wye must negotiate a narrow pinch point in the Hoarwithy Road just to the south of Pool Mill Bridge where poor visibility makes it particularly dangerous for pedestrians
- the amount of traffic travelling along the Hoarwithy Road coupled with increased on-
- street parking at Buckcastle Hill
- increasing vehicle and pedestrian safety at the road narrowing on the C1261 by Rock Cottage
- the absence of safe and convenient footways and cycle provision between the various settlements, including to the Primary School and Parish Hall, especially at Pool Mill Bridge, and leading to Ross-on-Wye

- although the area of flood risk associated with Wells Brook has a limited direct effect upon residential properties, it does have the potential to restrict access from the A49 to houses along the Hoarwithy Road and Buckcastle, as well as to the Claytons area past Poolmill

The NDP Public Consultation Draft April 2019 considered on pages 96ff 'Land at Cotterell's Farm' (Bk4). In its '**Impact on Highway Safety**' (p.97), it states: "The site sits outside of the 30mph speed limit. As the site therefore falls within the 60mph zone, sight lines of 215 m in either direction would be necessary to comply with HC's standards and this could not be achieved."

The site at Foxdale also had previous planning refused due to issues with line of sight.

In conclusion

- The Bridstow NDP has included a disproportionately large number of new houses in the Buckcastle Hill area which would constitute a 'major development' and does not comply with National Policy and should not have been included in the Bridstow NDP
- Two of the proposed sites fail on Highway Safety grounds because of the lack of the necessary sight lines.
- The proposed housing exceeds the required housing targets for the Parish
- The proposed development at the Cotterell's Farm site is out of keeping with a rural area within the AONB
- It is not necessary to change the use of the grade 2 farmland at the Cotterells site to housing
- Highways safety on the road leading to the Buckcastle Hill area is already a significant issue and no transport assessment has been undertaken. This road will already have to absorb the impact of additional traffic from housing developments in other surrounding villages as well the additional houses already granted planning in this area. There are no real options for mitigation to counteract the existing issues already acknowledged in the NDP even without this increase in traffic

Alison and Ivor Stemp (and children)

16-03-2021

Latham, James

From: Alex Atock
Sent: 08 March 2021 09:26
To: Neighbourhood Planning Team
Subject: Regulation 16 Bridstow NDP

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir,

My wife and I lived in REDACTED. During this time we found the area quiet and peaceful, although through traffic had gradually increased over the time that we were in residence. This tended to upset the tranquillity of the village. We know and are still in contact with many in the area and are distressed to have heard from several of plans to build a large number of new houses in this quiet village. We consider that:

- it is totally inappropriate to build so many houses so far from the village core;
- the Cotterell's Farm land, which we had been told by the owners would not be built upon and which is very good farmland as well as being outside the present settlement boundary of the village;
- building a group of 8 houses on that field together with 8 opposite on the Littlefields site is totally out of keeping with the village nature. In addition, it is against the expressed wishes of the community in the initial consultation when people said a very clear 'No' to larger groupings of houses.

In conclusion, we consider it to be wrong to build behind other houses in a way that is intrusive of their privacy and this would apply both to the Cotterell's Farm land and also the Foxdale site. To proceed with this development will turn Bridstow into a virtual suburb of Ross on Wye, to its detriment.

We respectfully request that this development does not proceed.

Thank you.

Yours faithfully,

Alex Atock



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Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 17 March 2021 19:11
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Address	
Postcode	
First name	Alexandra
Last name	Bubb
Which plan are you commenting on?	Bridstow neighbourhood development plan
Comment type	Objection
Your comments	<p>I would like to object to the regulation 16 Bridstow ndp I am surprised that such a large number of new properties in such a small radius has been proposed as at the moment there are roughly 20 houses along the route proposed, 26 new houses will over double the amount already here. There will be approximately another 90 vehicles travelling along an already very busy narrow lane that also floods. I feel that there are more suitable sites that the number could be used. Yours sincerely alexandra bubb</p>

Objections to the Bridstow NDP Regulation 16

My name: ANTHONY PRIDDIS

My address:

What follows are my **OBJECTIONS TO**

Regulation 16 plan stage

**Bridstow Parish Council Neighbourhood Development Plan (NDP),
submitted to Herefordshire Council on 21 January 2021.**

The consultation runs from 3 February 2021 to 17 March 2021.

1. OBJECTION IN PRINCIPLE TO PROPOSED DEVELOPMENT AT COTTERELL'S FARM

The NDP includes within it plans to develop 'Land at Cotterell's Farm' (para 8.21). The land in question is 1 hectare and the Parish Settlement Boundary has been re-drawn so as to include it. The land is open farmland which slopes away (northwards) from the Hoarwithy Road down towards Cotterell's Farm itself.

I object in principle to this proposal because it clearly does not comply with National Policy. My objections are for the following reasons:

- Firstly, a development of 1 hectare is, by definition, a '**major development**' (see The Town and Country Planning (Development Management Procedure) (England) Order 2015 para 2.– (1) "Interpretations...")
- Secondly, the **National Policy Planning Framework (NPPF), para 172**, says: "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues... The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest." (my underlining)
- The whole of the Bridstow area is within an AONB (para 2.22).
- The NDP itself recognises (para 6.2) that "It is national policy for planning permission for major development within these areas (i.e. AONBs) to be refused". (See also para 3.5).
- The Bridstow NDP makes no claim that its proposal for a 'major development' is in 'exceptional circumstances' and clearly it is not.
- The Bridstow Housing Target is for a minimum of 57 houses and the NDP provides an estimated total of 74 (para 8.25) so there is no case to be made that the proposal for

‘some 8 dwellings’ on Cotterell’s Farm are even needed, let alone that this constitutes ‘exceptional circumstances’ nor that they are ‘in the public interest’.

The Proposal for this ‘major development’ of the site at Cotterell’s Farm should clearly not have found its way into the NDP and should be withdrawn as it is neither sound nor complies with national policy.

2. HIGHWAY SAFETY OBJECTIONS TO THE PROPOSAL FOR DEVELOPMENT AT COTTERELL’S FARM

The NDP Public Consultation Draft April 2019 considered on pages 96ff ‘Land at Cotterell’s Farm’ (Bk4). In its ‘**Impact on Highway Safety**’ (p.97), it states: “The site sits outside of the 30mph speed limit. As the site therefore falls within the 60mph zone, sight lines of 215 m in either direction would be necessary to comply with HC’s standards and this could not be achieved.”

3. LANDSCAPE OBJECTIONS TO THE PROPOSAL FOR DEVELOPMENT AT COTTERELL’S FARM

The NDP states in para 8.21 that the “location and site configuration have been determined in order to mitigate effect upon the landscape...The need for significant areas of landscaping and buffers within the site is expected to reduce the developable area available. Specific measures will be required to address the effect upon the landscape and the character and setting of the settlement, in accordance with policy BR4.”

In other words, it is acknowledged from the outset that this development would need significant work done to mitigate the effects it will have upon the landscape precisely because the development will not be in keeping and will be at risk of not fulfilling BR4.

The best way of ‘mitigating’ is not to build in the first place.

Any plans which from the outset acknowledge that they are going to have to involve ‘buffers...to protect the residential amenity of neighbouring properties’ should never be started in an AONB and on virgin farmland. If a development is appropriate, then it should not need mitigation, protection, mitigation or buffers (which sound like ‘tokenism’: What does it mean in reality? Of what do buffers consist? How big are they? How many? Who owns them? What protection do they have for future years? Who maintains them?) The best buffer is not to build in close proximity to other houses.

The fact that ‘buffers’ are even proposed is an admission that these proposals do not comply with Policy BR10. See para 6.11 (c) which states: “New housing development, including extensions should respect local distinctiveness and fit coherently in the locality...ensuring that new developments do not adversely affect the amenity, privacy or aspects of adjacent properties.”

4. FARMLAND OBJECTIONS TO THE COTTERELL’S FARM SITE

This farmland is Grade 2 (i.e. Very Good) and currently used for grazing sheep. It has never been within the settlement boundary of the village. Para 3.32 of the NDP states: “The need to protect good quality agricultural land is recognised as important for the retention of the

existing pattern of land use and to support farming and other associated agricultural enterprises.” It is neither right nor necessary to take this field out of farm use for new housing.

5. OBJECTIONS TO THE COTTERELL’S FARM SITE BECAUSE OF ITS DISTANCE FROM THE VILLAGE CORE

As stated above (4), the Cotterell’s Farm field has always been outside the village itself and any houses put on this land would not be a cohesive part of the village but peripheral to it. Furthermore, they would be at the greatest distance of any houses in Bridstow from the core amenities and community buildings of the village, namely the school, hall and church. This is at variance with the NDP’s stated intention in 4.2.6:

“To strengthen community identity and cohesion, and its health and well-being through:

1. c) Seeking measures that would place the village school and village hall at the core of the community.”

6. OBJECTIONS TO THE COTTERELL’S FARM SITE’S VISIBILITY

The Hoarwithy Road rises up from Pool Mill on its way towards Sellack, and the Cotterell’s Farm field is at the top of the hill. It is the highest and most visible land in Bridstow. It can be seen from some miles away. Therefore, any development on it would damage the landscape.

Any redrawing of settlement boundaries needs to take into account landscape considerations and “would be contrary to the protection of the AONB required by national policy unless detailed visual impact analysis has been undertaken.” (Quote from Independent Examiner for Brampton Abbots and Foy NDP: Liz Beth BA (Hons) MA Dip Design in the Built Environment MRTPI)

‘Visual impact analysis’ has not been undertaken so this proposal does not comply with the national policy and is not sound in this regard either.

Plans to build on the field below Foxdale in 2014 were rightly rejected. This field at Cotterell’s Farm is an even more sensitive site than that one and should also be rejected.

7. OBJECTIONS TO THE CHARACTER OF THE PROPOSED DEVELOPMENT AT COTTERELL’S FARM

Para 8.21 of the Bridstow NDP says of this proposed development “a signature building reflecting a gatehouse should be provided at the entrance to the development”. This serves to underline the point that the development would be wholly out of keeping with the rural

character of the village of Bridstow and this AONB. What is being proposed is more like a suburban gated community than an integral part of a Herefordshire village.

New development needs to “preserve and enhance the scenic beauty of the AONB and its setting”. The NPPF places great weight on this and the NDP proposal fails to do so.

Para 2.2 of the NDP has already acknowledged that: “Previous attempts to accommodate development pressures have resulted in an uncharacteristic nucleated or clustered settlement pattern. This pattern is considered capable of accommodating only limited new development with that in villages and hamlets needing to be modest in size to preserve settlement character.” Despite this recognition, the proposed developments in the Buckcastle Hill area of Bridstow would give two developments totalling 16 houses or more in a sweep round with only a road separating one group of 8 from the others. These 16 houses would certainly be ‘an uncharacteristic nucleated or clustered settlement pattern’ and should never be permitted. If they had been put forward as a single proposal, rather than as two proposals, they would not even have been considered.

8. OBJECTIONS TO SO MANY NEW HOUSES BEING PROPOSED IN BUCKCASTLE HILL AREA

The NDP identifies there being 40 houses in the Buckcastle Hill area (para 3.17). The NDP proposal (para 8.25) is for 26 new houses in this one area i.e. a 65% increase. This is vastly out of proportion and also would locate the new houses and the people living in them at the greatest distance from the Bridstow village core and ‘hub’ of school, hall and church.

A 65% increase in housing density in the Buckcastle Hill area is at odds with the NDP’s own favoured Option 2 (para 3.41) which is “identifying a number of smaller sites that would be in keeping with the scale of development within Wilton and the 3 main settlements in Bridstow”.

Also, the Littlefields site, for which there is already planning permission for 8 houses, is separated only by the Hoarwithy Road from the start of the proposed Cotterell’s Farm development. They may be ‘listed’ as two separate developments, but together would form a continuous sweep of 16 houses, which is clearly at variance with the desire to seek a ‘number of smaller sites’.

9. CONCLUSIONS

1. The proposal to build a ‘major development’ on the Cotterell’s Farm is not sound and does not comply with National Policy and should never have been included in the Bridstow NDP.
2. The Cotterell’s Farm site proposals also fail on Highway Safety grounds because of the lack of the necessary sight lines.
3. The Cotterell’s Farm site proposals do not meet Policy BR4.
4. It is neither right nor necessary to remove the Grade 2 Very Good Farmland at Cotterell’s farm out of farming use for houses.
5. To propose building at the furthest distance from the core of Bridstow village does not meet the NDP stated intention of “strengthening community identity and cohesion”.
6. No visual impact analysis has been undertaken to justify the proposed extension of the existing settlement boundary, and so the proposal does not comply for this reason either with national policy.

7. The character of the proposed development at the Cotterell's Farm site does not comply with the National Policy Planning Framework.
8. The Bridstow NDP has included a disproportionately and unacceptably large number of new houses in the Buckcastle Hill settlement area. The Bridstow NDP makes provision for 17 more houses than are required. The proposals for houses to be built at
 - the Cotterell's Farm site ('some 8 dwellings')
 - land adjacent to Foxdale ('a minimum contribution of 3 dwellings')
 - land adjacent to Oaklands ('a contribution of 5 dwellings')should all be removed from the NDP. The Bridstow Housing Target of 57 houses can be met without any of these 16. The Bridstow Housing Target without them would still be 58 (and also still leave 10 new houses in the Buckcastle Hill area which constitutes a 25% increase on what is currently there).
Therefore, do not include these three sites. They are not needed and the Cotterell's Farm one especially does not comply with national policy.

Anthony Priddis

25th February 2021

Latham, James

From: Turner, Andrew
Sent: 09 March 2021 12:03
To: Neighbourhood Planning Team
Subject: RE: Bridstow Regulation 16 submission neighbourhood development plan consultation

RE: Bridstow 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 proposed housing site allocations identified for new housing development (*Policy BR15*) as outlined in brown the Bridstow (Baunntree) and Bridstow (Buckcastle Hill) Policies map.

Policy BR15: Housing Sites in Bridstow Village:

'Bridstow Policies Map (Bannuttree)'

- i) Land amounting to around 0.45 hectares at Bridruthin, Bannuttree.
 - A review of Ordnance survey historical plans indicate the proposed site appears to have had no previous historic potentially contaminative uses.
- ii) Land amounting to around 0.4 hectares at the Old Vicarage, Bannuttree.
 - 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

'Bridstow Policies Map (Buckcastle Hill)'

- iii) Land amounting to around 0.8 hectares at Oaklands, Buckcastle Hill.
 - A review of Ordnance survey historical plans indicate the proposed site appears to have had no previous historic potentially contaminative uses.
- iv) Land amounting to around 0.4 hectares at Foxdale, Buckcastle Hill.
 - A review of Ordnance survey historical plans indicate the proposed site appears to have had no previous historic potentially contaminative uses.
- v) Land amounting to around 1 hectare at Cotterell's Farm, Buckcastle Hill.

- A review of Ordnance survey historical plans indicate a Builder's Yard site for was situated immediately adjacent to the south of the allocated site.
It is possible that unforeseen contamination may be present at the above mentioned site. Consideration should be given to the possibility of encountering contamination as a result of its former use and specialist advice be sought should any be encountered during the development.

I would recommend that any proposed sites in future NDPs are labelled in maps with clear IDs to help with referencing and identification.

General comments:

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

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

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

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

Kind regards

Andrew

Herefordshire.gov.uk

Andrew Turner
Technical Officer (Air, Land & Water Protection)
Economy and Place Directorate,
Direct Tel: 01432 260159
Email: aturner@herefordshire.gov.uk



The Coal
Authority



200 Lichfield Lane
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Mansfield
Nottinghamshire
NG18 4RG

Tel: 01623 637 119 (Planning Enquiries)

Email: planningconsultation@coal.gov.uk

Web: www.gov.uk/coalauthority

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

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

17 February 2021

Dear Neighbourhood Planning and Strategic Planning teams

Bridstow Neighbourhood Development 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

From: Dave Colman
Sent: 09 March 2021 12:24
To: Neighbourhood Planning Team
Subject: Comments on Bridstow Neighbourhood development plan.
Attachments: Bridstow Neighbourhood Plan Response 9 Mar sheet.pdf

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi,
Please find attached my comments on the Bridstow neighbourhood development plan.
Thanks,
Dave Colman

Sent from [Mail](#) for Windows 10

Comments on specific policies

Policy and/or Paragraph No	Comments and/or suggested changes
<p>Page 11 Paragraph 2.21</p>	<p>This paragraph says “No areas of derelict land have been identified or areas of land suitable for regeneration” but according to the Herefordshire call for land HLAA/449/001, the “Land east of the A49” is brownfield land, and is available for development. (https://www.herefordshire.gov.uk/download/downloads/id/2557/bridstow.pdf) There are already houses in this area, so why is it not promoted for small-scale development, given Herefordshire council’s stated aim for brownfield development wherever possible. (in appendix 1, page 75)</p>
<p>Page 14 Paragraph 3.11</p>	<p>There is a statement the “it is important that the settings of the parish’s settlements and important landscape and heritage features are conserved or enhanced where appropriate from all directions along the major highways, other roads and footpaths through the Parish”. Why is this important, and who decided it is more important than other deciding factors. This statement seems to be scene-setting for later, where being visible from the road is more significant than having development crammed almost into residents’ back gardens.</p>
<p>Page 14 Paragraph 3.12</p>	<p>“61% of respondents indicated they would like the NDP to include settlement boundaries for settlements”. The plan seems to lean on this factor pretty substantially, so it is important to know what people actually voted for. How was the question actually posed? Did the respondents clearly understand that it would mean restriction of the potential for development to their immediate vicinity? It is, in effect, a change in policy from the traditional developments which are sparse developments, along the roads, particularly on Buckcastle hill.</p>
<p>Page 14 Paragraph 3.13</p>	<p>There is a mention of the visual gap between Wilton and Bridstow. Why should there be a need or requirement for a visual gap? There are two concentrated settlements in the area of Wilton and Bannuttree Lane, why not join up the two settlements? The fields between are not particularly notable or typical. As paragraph 3.15 alludes to, there is already a connection at the southern corner of the Bannuttree lane development.</p>
<p>Page 15 Paragraph 3.15</p>	<p>“Accessibility is a constraint, and this includes poor junctions onto both the A49 and A40”. There is an opportunity to improve the junction onto the A49 and reduce the likelihood of accidents by moving the junction toward the A40/A49 roundabout, as described later in the plan, BT3C, but this seems to have been dismissed due to local objection, and the possibility of highways agency objection. But as can be seen by the current large scale developments on the east of Ross, changes to major roads such as the A40 are possible.</p>

<p>Page 20 Paragraph 3.32</p>	<p>“The need to protect good quality agricultural land is recognised as important”. Only a small piece of land is particularly good quality according to section 2.21. None of the proposed developments would use up much land, compared with the amount of agricultural land available in the Bridstow area.</p>
<p>Page 21 paragraph 3.36</p>	<p>“young people in the Parish experience is the lack of footpaths, and the fact that they feel the roads are unsafe for walking or cycling”. No allowance seems to have been made for this, in the proposed development. School children currently walk past the Rock cottage pinch points, and the proposed most favoured developments are likely to add more traffic and more children into this risky area</p>
<p>Page 21 Paragraph 3.42</p>	<p>“Residents were strongly opposed to this approach and no suitable and available options were considered to provide sufficient public benefits to outweigh objections to ‘major development’ that would result, as required by NPPF paragraph 172”. Which residents objected? Would it be residents next to the proposed developments, even though the proposed ones were similar to the existing ones?</p>
<p>Page 21 Paragraph 3.43</p>	<p>“Spreading housing provision across the settlements areas in scale with their character and size offers a fair distribution between them and places less pressure upon the local environment, allowing better integration of new residents into the respective communities.” Some areas have no proposed developments, (e.g. the Bannuttree lane area, REDACTED) However, Buckcastle hill seems to have been targeted specifically for multiple developments even though those proposed developments don’t match the existing wayside cottage style of the Buckcastle hill area.</p>
<p>Page 21 paragraph 3.44</p>	<p>“no suitable site for this became available at the end of the site search process” For Bridstow, the area behind the school and close to the school would seem to be a suitable site.</p>

<p>Page 22 Paragraph 4.2.c</p>	<p>“Preserving the landscape and natural settings of the settlements that comprise Bridstow, in particular by maintaining the landscape that separates them from Ross-on-Wye and Wilton”. How did the separation become a core requirement? The southern end of Bannuttree Lane already touches Wilton.</p>
<p>Page 28 Policy BR4 d</p>	<p>“Ensure that proposals do not visually diminish the openness of the Strategic Green Gap between Bridstow and Wilton” Where did the concept of a “Strategic Green Gap” come from? Establishing this requirement seems to be goal of an author. “alien urban appearance” No-one is proposing an alien urban landscape, just a few houses on otherwise unattractive fields on both sides of the a49, and an improvement to the road junction.</p>
<p>Page 38 Paragraph 8.3</p>	<p>“Wilton Castle, an important Scheduled Ancient Monument that contributes significantly to views of the Wye valley AONB from Ross-on-Wye” Wilton castle is a private property with no public access and no particular concession should be made to it. Who has decided that it is important? It might be seen from the Prospect, (although this is difficult for most of the year due to the large trees surrounding the castle) but no development is likely to interrupt that view, because of the flood plane.</p>
<p>Page 40 Paragraph 8.11</p>	<p>“..extensions to encompass three housing allocations“ Why have development boundaries been changed to accommodate three housing allocations. What is the point in the boundaries if they are changed to accommodate the allocations? “Specific provision is made to ensure its character is retained”. The character of Buckcastle hill is wayside cottages. The proposed developments are not of this type.</p>
<p>Page 44 Paragraph 8.20</p>	<p>“Measures may be required to protect land further to the east on the opposite side of the existing track from development” who decides whether these measures are required?</p>

<p>General comments</p>	
<p>The Plan does not reflect the original requirement for a 64/36 split between Bridstow and Wilton. The plan restricts development by development boundaries. Who decided where these would be placed? There should be a statement of interest by the authors. This statement would not have to list the names, maybe just the area in which they live, and their particular interest.</p>	

Thank you

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 16 March 2021 10:43
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Address	
Postcode	
First name	Dave
Last name	Payne
Which plan are you commenting on?	Bridstow Neighbourhood Development Plan
Comment type	Objection
Your comments	<p>Whilst I would generally support considered and proportionate development I feel I have to object to the plan in its current form due to, what would seem, disproportionate development within the Buckcastle Hill area of the village when compared with the overall area covered by the plan. The plan would see a comparatively large number of new houses to be built away from what is considered by many to be the village centre and amenities i.e. by the school, church and local shop (Petrol Filling Station) at Wilton; surely development would be better suited to be "local" to the scant amenities we have in the village rather than spreading them to the outskirts. In the current times we need to see development is sustainable, not just in good building practice but also reducing vehicular movements and encouraging walking and cycling, other than words there is little in the way of proposals to achieve these stated council aims. These aims would be easier to achieve by making development closer to these amenities. I also have concerns that the "developments" should be in keeping with the local aesthetic - no gated communities, homes should be low rise and should be in keeping with the councils stated aims of maintaining the village feel not an urban landscape. With the proposed developments in the Buckcastle Hill area comes the additional traffic that would be generated on the local roads during construction and after occupation, all these</p>

developments are off a road that is currently designated at 30 miles per hour, has no foot paths or even verges that can be walked upon; I personally walk this road at least twice a day as do many local residents and currently vehicular users seem to think that they are out of the village and the hill is the point to accelerate away from the village doing 40/50/60 miles an hour having no respect for the local residents who have to use the road for pedestrian purposes - catching the bus, walking the dog etc and these plans will only make matters worse. I accept that developments will happen but serious consideration needs to be given to traffic management at all times (during construction and after occupation) when considering each individual site. In summary, I accept some development needs to happen but as stated above it needs to be proportionate and in keeping with the area; 26 new homes in the Buckcastle Hill area off the Hoarwithy Road is disproportionate.

Latham, James

From: Ryan Norman <Ryan.Norman@dwrcymru.com>
Sent: 17 March 2021 08:53
To: Neighbourhood Planning Team
Subject: {Disarmed} RE: Bridstow Regulation 16 submission neighbourhood development plan consultation
Attachments: DCWW consultation response - Bridstow NDP - December 2019.pdf

This message originated from outside of Herefordshire Council or Hoople. Please 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 provided representation at the Regulation 14 stage – attached for info. We have nothing further to add at the current time, other than the fact that the reinforcement scheme at Lower Cleeve WWTW has now taken place.

Please let me know if you require further info.

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

E: developer.services@dwrcymru.com

Bridstow Neighbourhood Development Plan

FAO Mrs Pat Newton - Clerk

Sent via email

16th December 2019

Dear Mrs Newton

REGULATION 14 PUBLIC CONSULTATION ON BRIDSTOW NEIGHBOURHOOD DEVELOPMENT PLAN, DECEMBER 2019

I refer to the above consultation that is currently underway. Welsh Water appreciates the opportunity to comment and we offer the following representation:

Given that the Neighbourhood Development Plan (NDP) has been prepared in accordance with the Adopted Herefordshire Local Plan Core Strategy we are supportive of the aims, objectives and policies set out.

We are particularly welcoming of the inclusion of Policy BR8 (sewage infrastructure). This policy provides the assurance that unless there is sufficient capacity at the Lower Cleeve Wastewater Treatment Works (WwTW), development will be delayed until it becomes available with developers able to fund the works.

However, we can advise that we are currently undertaking a reinforcement scheme at Lower Cleeve WwTW within our current Capital Investment Programme (AMP6 – 2015-2020), which is due for completion by 31st March 2020. As such, we are currently requesting that Herefordshire Council include a Grampian style planning condition on any new development within the WwTW catchment to restrict communication to the public sewerage network until this date.

On completion of this reinforcement scheme, there will be no issue in the WwTW accommodating the foul-only flows from the growth proposed in the NDP.

There are no specific issues anticipated with either the public sewerage or water supply networks in serving the proposed allocations, though some level of offsite mains/sewers may be required in certain instances in order to connect to the existing networks.

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

Yours sincerely,

Ryan Norman
Lead Forward Plans Officer
Developer Services

Latham, James

From: edward price on behalf of edward price
Sent: 16 March 2021 21:20
To: Neighbourhood Planning Team
Subject: Bridstow (including Wilton) Neighbourhood Plan Reg 16 comment.
Attachments: Bridstow comment.pdf

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Edward Price

Ref land at Wilton Lane, Wilton, Ross on Wye.

Wilton boundary.

Bridstow plan as submitted at reg 16 does not provide for an appropriate level of new housing in the village of Wilton and the suggested boundary appears to have been drawn such as to deliberately exclude the available land to the South West of Wilton Lane and at a time when Herefordshire as a whole is failing to provide sufficient housing (further impacted by recent decisions now taken about the route of the city bypass) is thus contrary to the spirit and purpose of the plan.

Though the shape of the site subdivision at W1 Wilton lane was considered to be incongruous , it does not follow that an alternative simple linear subdivision parallel to the lane and constrained to be in line with Bannutree Lane is incapable of providing nine 2 and 3 bedroom houses (where there is currently a Local area imbalance) at the higher density suggested in the plan process and which it has now been demonstrated is the limit the highway is easily capable of accommodating.

Such a design additionally utilising a carefully designed row of garage/home offices in part of the available space adjacent to the A40 to create an acoustic shadow, is capable of meeting all the legal amenity requirements.

The appeal relating to the previous planning application did not in fact confirm any material objections relating to drainage/flooding, noise/air quality or highways safety, an outcome that is at odds with the provenly inaccurate SHLAA which should thus carry no weight in this assessment.

However it did signal the need for a detailed design to appropriately respect the historic visual aspect as seen from the river in conjunction with the bridge and adjacent buildings. Following such process there is no reason this modified site could not improve upon the existing C20th century frontage and thus combined with simpler, but more effective landscaping improve the setting of the heritage assets.

Enjoying a south westerly aspect it is ideal for a zero carbon build of such smaller houses and by incorporating a capacity for home working and electric vehicle charging could achieve several of the requirements identified in the AONB management plan for the provision of a type of housing that is greatly needed.



Historic England

Mrs Pat Newton
Bridstow Parish Council

Direct Dial: 0121 625 6887

Our ref: PL00631883

3 March 2021

Dear Mrs Newton

BRIDSTOW NEIGHBOURHOOD PLAN - REGULATION 16 CONSULTATION.

Historic England has no adverse comments to make upon the Submission Neighbourhood Plan which we feel takes a suitably proportionate approach to the main historic environment issues pertaining to Bridstow.

Our previous comments on the Regulation 14 Plan remain entirely relevant that is:

"We are pleased to note that the Plan evidence base is generally well informed by reference to the Herefordshire Historic Environment Record including the Herefordshire Landscape Character Assessment and we are supportive of both the content of the document and the vision and objectives set out in it. We commend the general emphasis given to the conservation of landscape character and the maintenance of local distinctiveness.

The commitment 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 is equally commendable. The recognition of the importance of Historic Farmsteads being sustainably and sensitively converted and of the need to take account of archaeological remains 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



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6888
HistoricEngland.org.uk



Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 12 March 2021 10:51
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Address	
Postcode	
First name	Ian
Last name	Jenkins
Which plan are you commenting on?	Bridstow Parish plan
Comment type	Objection
Your comments	<p>I commend the Parish council for all the hard work that is and has been involved in completing this plan. There is a huge amount of legislation to get to grips with. The general public/residents of any Parish are apprehensive of any plan that involves the building of additional housing especially in more rural villages where over the years infill has been allowed and to a large degree this being on a lane between existing property. However where building is proposed behind existing property the response by residents is extremely emotive. Their reason why people move to a rural setting is NOT to be surrounded by other property otherwise they would live in a town or the centre of a village. The proposed areas for development in Bridstow are all behind existing property and the landowners do not appear to be affected at all. My view is that there should not be any development BEHIND existing property but alongside where this is possible. If not then NO building should be allowed. It seems to be that as long as habitat and animals are not affected then the existing residents can put up with it. I cannot agree to this approach.</p>

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 16 March 2021 16:28
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Address	
Postcode	
First name	IRENE
Last name	MEREDITH
Which plan are you commenting on?	BRIDSTOW NDP REGULATION 16
Comment type	Objection
Your comments	<p>I refer you to the objection already lodged by neighbour, Anthony Priddis, on 25/2/2021. Having read the NDP, I find his objections are well researched, cogently argued and worthy of full support. It is not necessary to repeat all that he has clearly laid out and I have previously lodged objections to the development at 'Little Fields'. The potential development proposed in the 3 sites around the Buckcastle area would adversely impact the rural nature of the location and quality of life of the existing residents. I wish to draw attention to the following: 1) The land identified for potential development at The Cotterells Farm is rolling pastureland in an AONB. Recommendations in the NDP that requirements would be necessary to 'mitigate the effects' the development would have on the landscape clearly recognise that it would be detrimental to the rural landscape. This is not just viewed from the roadside but in all directions. 2) The identified development of 8 houses on the field, together with other developments proposed opposite at Little Fields and further down the hill, increase the number of dwellings in this rural area disproportionately and exceed the requirements required by the Bridstow Housing Target. 3) There are no amenities in this area to support the increase in population. Public transport is minimal so such developments would bring significant increase in the number of private cars and delivery vehicles accessing the Hoarwithy Road. The NDP recognises the dangers of</p>

this road ,particularly the narrowing as it approaches the A49 and the sharp bends prior to this point. Years ago planning for a one small bungalow for ageing family members was refused on this land. Extending the hamlet and increasing access onto the Hoarwithy Road were deemed inappropriate and cited by the Planning Authority in the reasons for refusal. These conditions have not changed, except the volume of traffic has increased, prompting the provision of 30mph signs further along the road but this limitation is largely ignored by through traffic. In summary, I concur with objections already covered in detail in the submission by Anthony Priddis and believe the proposed developments do not comply with national policy

Dear Sir

We would like to make the following points regarding the proposed development at Bidruthen on the above properties (ADDRESSES REDACTED) which we consider not to have been sufficiently highlighted in the Bridstow Parish NDP document.

Impact on highway safety

This item we strongly concur with but would like to emphasise the difficulties for pedestrians wishing to walk to Wilton or Ross or to get to the School, Church, or Village Hall where one has to cross the A49 trunk road

Item 2 Development of Footpath and access to the proposed Site

The poor access to the site is not adequately reflected in the NDP Document though it does state that a small part of Bidruthen's curtilage would be required. The present access is shown in the attached Photos Turning left out of this lane past Wye View would be difficult for a lorry because the lane at this point is a maximum of 5.5 meters wide and is immediately opposite Spring Bank.



View of paddock entrance at the side of Wye View View exiting the paddock towards Spring Bank

The impact of building an access road alongside Wye View would be very significant as this property is built within 4ft of the existing field access and is approximately 3 ft below the lane level. The rear entrance of the bungalow is on this side of the building and the oil tank is located at the rear of the garage. There would obviously be increased noise and air pollution suffered by the occupants of Wye View

Item 3 Impact on Amenity of residents

In the proposed plan put forward by the developers the access road to a turning area ran immediately behind these properties with the bungalows facing our properties. This is understandable because of the large oak trees at the western boundary of the paddock which must be kept in any development plan.. However this arrangement affects our security creating an easy rear access plus the maximum adverse effect on our privacy. Should any development be granted in this area, to mitigate the impact on privacy, there should be a height restriction limiting the properties to single story dwellings. Due to the proximity of any building, ideally they should be backing onto our properties.

John Chapman

Mike Tunnycliff

Fred Cook

11 MAR 2021

To: _____
Ack'd: _____ File: _____

BRIDSTOW NEIGHBOURHOOD PLAN
REGULATION 16

6th March 2021

Name: Julia Wilde

Address: [REDACTED]

As an original and former member of The Bridstow NDP Steering Group, I have studied the new NDP Draft Plan Reg 16 in detail, and I am very disappointed and concerned about several of the proposals submitted to the Herefordshire Council on 21 January 2021.

HISTORY

In 2013 several parishioners formed a Steering Group, representing all areas of the community to put together a sensitive NDP, with consultation and involvement of the public. We held regular Open Meetings, Open Days and encouraged residents to voice their opinions and requirements and published detailed minutes. Unfortunately none of these minutes are available on the website for the period from 2013 until May 2016. It was with regret Bridstow Parish Council decided to disband The Steering/Working Group and all its members in May 2018, and take over themselves.

During those five years we had worked hard and tirelessly to reach certain goals, that the parishioners had raised from a questionnaire in 2016 and at popular Open Days.

Some of the key points were:-

- a. All developments should be in small clusters with a maximum of 5 houses.
- b. Any landowners putting forward sites should provide information on plans, design, scale, and be available to the public.
- c. That all sites offered for development should be included in the draft plan.
- d] That a 'Core' around the school, village hall, and church could be identified and nearer to the facilities around Wilton.

CONCERNS

1. In the minutes of 15th April 2019 Meeting, the Parish Council assured the public that the Draft Plan Reg 14 would be the same as the Steering/Working Group had worked on previously i.e. same sites. An Open Session on this draft was open to the public on November 23rd 2019 for 4 hours. Out of 726 parishioners only 21 attended, We were asked to fill in a response sheet with comments. I and other parishioners who replied have never been informed as to the outcome of these responses and no information published on the website, despite reassurances from the Parish Council's minutes of 20th January 2020 : Item 6.

2. It is with concern that 'Public Participation' at meetings since the disbandment of the Steering/Working Group in 2018 has been predominantly 'NONE'. Due to the fact that questions from the public were made very restrictive during the Parish Council meetings. Parishioners have become disheartened and unfortunately lost interest from lack of information.

3. Communication from The Parish Council has been very poor about this new Draft Plan, no information on the website or email, and it was only through a vigilant neighbour we were informed about the submission to HCC. **The majority of parishioners are unaware of these proposals and therefore will be unable to comment.**

4. There is no provision for low cost homes or first time buyers. All developments are for large executive house and garages.

OBJECTIONS/COMMENTS to REGULATION 16.

1. Not all the 'call for land' sites have been included in the plan. Some were too readily dismissed since 2018.

I.e. Detailed plans from The Duchy for development on their land were produced [which is a large proportion of the parish]. This included a sympathetic development around Wilton, and included extra car parking for the C of E Bridstow School, footpaths for children, and a safe access to the church [all very important criteria from residents in the questionnaire]. There was an open public presentation for this Plan.

Wilton Cottages – a **brownfield site**. This particular site had previously received planning permission for a car park and conversion of the barn on the site into a restaurant.

2. A significant area of Buckcastle has boundaries of '**Area of Special Character**' BR17 Buckcastle Hill Polices Map. This is a new development in the plan. On what criteria was it decided to outline this area? The whole area is within the AONB already.

3. **BR11 d]; Traffic Measures within the Parish.**

.....'to improve road safety' at the narrow section of the C1261 by Rock Cottage is going to be very difficult as a house is already being built on the apex of this corner. Unless land is compulsory purchased to widen this point it will never be achieved. We have lived in our house for 48 years and the Parish Council/ Highways have up to date never solved this ongoing issue.

4. **Policy BR9: Sustainable Design c]**

This statement cannot be achieved with reference to houses being built in the Buckcastle area, due to the distance from any infrastructure and lack of any pedestrian friendly environment to local facilities.

5. The redrawing of the settlement boundary in the Buckcastle area has been extended to its furthest distance from 'The Core' of the village. 'The Core' that parishioners wished to be enhanced in the questionnaire.

6. The draft plan is seeking to put 26 new houses along the C1261. The road has a pattern of about 24 'way side' small dwellings fronting onto the road from the A49 to The Nook at the furthest end. In our life time of living here for 48 years only individual infills of low rise dwellings have been added all of which have discreetly fitted into the landscape.

Now 26 large executive houses are planned for this road.

16 proposed by the NDP draft - Cotterells -8, Foxdale-3, Oaklands-5

Planning permission obtained - Littlefields-8, foxdale-1, Woodfields-1 Total 10

Plus Planning permission being sought - Foxdale -3

This makes a total of 29 houses. Over 100% increase in this area. This is way out of proportion with the rest of the parish, and we as residents would be heavily penalised, buy such an increase in density.

7. Cotterells Farm

a] This proposal of land and houses for development has been increased since the last draft plan in November 2019 which was available to the parishioners. We have not been informed of this change of plan and nor is it recorded in any minuets.

In a document 'Meeting Housing Need and Site Assessment Report' March 2019 : 4.11, it is stated 'The Parish Council authorised discussions..... with the landowners'.

I understand from the landowners of Cotterells Farm that they deny any knowledge of this new site being put forward for 8 houses on their land.

b] The development is right next door to farm buildings on a working small farm. Green pasture land is being destroyed and altering the character of the countryside and landscape around this area, which has meant so much recently to local residents especially in this time of the covid pandemic, for our wellbeing and exercise.

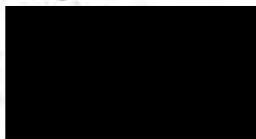
CONCLUSION

This I feel is a poorly conceived NDP Plan from The Parish Council, and has not adhered to the initial and important issues that parishioners expressed at the beginning of this NDP plan in 2013. It has taken nearly 8 years to reach this stage and unfortunately the priority in the last few years seems to have produced a plan that will only provide HCC with enough houses to satisfy their Housing Target. **This has been done without enough consultation or information easily available to the community.**

This has left the parishioners disheartened and sufficiently contentious as to be likely defeated at the Referendum Stage.

Yours Sincerely

Julia Wilde



P.S. I enclose a map that was available to all parishioners at our Open Day in 2016, where residents were invited to put stickers where they would prefer housing development. Red stickers for unsuitable development and green for acceptable development.

As is evident from the consensus of opinion the majority of development is near good infrastructure and facilities, i.e. around Wilton and the school. Residents were aware of not developing where the roads are narrow and dangerous and not easily accessible to facilities.

The Draft Plan seems to have ignored all these observations.



Objections to the Bridstow NDP Regulation 16

Name: KATHY PRIDDIS

Address:

**Bridstow Parish Council Neighbourhood Development Plan (NDP)
Regulation 16
submitted to Herefordshire Council on 21 January 2021.
Consultation dates 3rd February - 17th March 2021.**

The Parish Settlement Boundary in the NDP has been re-drawn to accommodate plans to develop 1 hectare of LAND AT COTTERELL'S FARM (para 8.21) for housing. This site is open farmland with a downward slope stretching north from Hoarwithy Road towards the Farm.

OBJECTIONS IN PRINCIPLE

I object to this proposal, *or any modified proposal on the same site*, because it fundamentally conflicts with National Policy. My reasons are set out below:

A. THE PROPOSAL IS FOR NEW HOUSING WITHIN AN AONB

1a. The National Policy Planning Framework, para 172, states: **Great weight should be given to conserving and enhancing landscape and scenic beauty in... Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues...**

The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development (see below at B) other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.

NB The whole of the Bridstow area is within an AONB (para 2.22).

1b. The Government guidelines in *'Understand the role of Natural England... when managing AONBs in England'* (updated 2018) state that: **Before an area becomes an AONB it must meet the 'natural beauty criterion'. This could be a combination of factors, such as:**

- **landscape quality, either natural or man-made**
- **scenic quality**
- **relative wildness, such as distance from housing or having few roads**
- **relative tranquillity, where natural sounds such as streams or birdsong are predominant**
- **natural heritage features**

B. OBJECTIONS TO THE SIZE OF THE PROPOSAL WITHIN THE AONB

A development of 1 hectare is, by definition, a 'major development' (cf. The Town and Country Planning (Development Management Procedure) (England) Order 2015 para 2.– (1) "Interpretations...")

- The NDP itself recognises (para 6.2) that **It is national policy for planning permission for major development within these areas (i.e. AONBs) to be refused.**
- The Bridstow NDP gives no evidence that its proposal for a 'major development' fulfils either 'exceptional circumstances' or 'the public interest'.

C. OBJECTIONS TO THE INFLATED NUMBER OF NEW HOUSES PROPOSED IN BUCKCASTLE HILL AREA

The Bridstow Housing Target is for a minimum of 57 houses. The NDP provides an estimated total of 74 (para 8.25). Therefore no case can be made that the proposed "some 8 dwellings on Cotterell's Farm", *or in fact any number of dwellings on that site*, are necessary.

D. HIGHWAY SAFETY OBJECTIONS

The NDP Public Consultation Draft April 2019 considered on pages 96ff 'Land at Cotterell's Farm' (Bk4). In its 'Impact on Highway Safety' (p.97), it states:

The site sits outside of the 30mph speed limit. As the site therefore falls within the 60mph zone, sight lines of 215 m in either direction would be necessary to comply with HC's standards and this could not be achieved.

The Hoarwithy Road is an historic link road between Hereford and the A49 near Ross, serving numerous villages.

- The traffic from the Hereford direction enters the 30-mph area after the proposed site, at which point the lane becomes an increasingly narrow and steep downward-sloping hill, reducing to less than 3.0 metres wide between houses, making it impossible for two vehicles to pass each other.
- The road is subject to heavy farm traffic, with 2 dangerous bends at Pool Mill.
- There is no pavement access at all to the village school from the Cotterell's Farm site until the top of the Hoarwithy Road where it meets the A49.
- There is limited on-road parking at the school and limited spaces at the village hall car park.

E. LANDSCAPE OBJECTIONS

1. The NDP (para 8.21) states that **the location and site configuration have been determined in order to mitigate effect upon the landscape...The need for significant areas of landscaping and buffers (cf 2 below) within the site is expected to reduce the developable area available. Specific measures will be required to address the effect upon the landscape and the character and setting of the settlement, in accordance with policy BR4.**

In other words, it is openly acknowledged that mitigation work to safeguard the landscape would be necessary precisely because the development will not be in harmony with the character of nearby dwellings and therefore cannot fulfil BR4.

2. **Buffers.**

- Any plans which admit the need for buffers to protect the residential amenity of neighbouring properties should never be initiated in an AONB nor on virgin farmland.
- No evidence is identified regarding the nature of these buffers, or their height, scale, proximity to existing dwellings, ownership or future maintenance.
- A development not in close proximity to other houses would not require mitigation: cf Policy BR10 para 6.11 (c) states: **New housing development, including**

extensions should respect local distinctiveness and fit coherently in the locality... ensuring that new developments do not adversely affect the amenity, privacy or aspects of adjacent properties.

D. OBJECTIONS TO THE INFLATED NUMBER OF NEW HOUSES PROPOSED IN BUCKCASTLE HILL AREA

1. The NDP identifies 40 houses in the Buckcastle Hill area (para 3.17).

The NDP proposal for this one area (para 8.25) is for 26 new houses which is a disproportionate increase of 65%. I.e.17 more houses than necessary and conflicts with the NDP favoured Option 2 (para 3.41) which is **identifying a number of smaller sites that would be in keeping with the scale of development within Wilton and the 3 main settlements in Bridstow.**

2. The Littlefields site of 8 proposed houses is adjacent to the proposed Cotterell's Farm development for 'some' 8 houses, with only the narrow Hoarwithy Road between them. Any joined-up thinking (and planning) would immediately demonstrate that this creates a sub-hamlet of at least 16 houses, which is clearly at variance with the avowed intention to seek 'a number of smaller sites'.

4. The proposed plan would locate the new houses and their inhabitants at the greatest distance of any houses in Bridstow from the amenities and community buildings of the village school, hall and church. (*cf D above, para 2 - pavements*) Any houses put on this land would therefore not be a coherent part of Bridstow village.

5. The suggestion in para 8.21 of **a signature building reflecting a gatehouse at the entrance to the development** underlines the above point (4) in that what is being proposed resembles a separate 'gated' community, isolated from the rest of the village and out of character with it.

E. ENVIRONMENTAL OBJECTIONS TO THE COTTERELL'S FARM SITE

1. This farmland, which is currently used for grazing, was never within the settlement boundary of the village. Para 3.32 of the NDP states: **The need to protect good quality agricultural land is recognised as important for the retention of the existing pattern of land use and to support farming and other associated agricultural enterprises.**

2. The Cotterell's Farm site is a wide hilltop with Grade 2 (Very Good) quality soil. Seven years ago the owner of the farm told us that he had crossed the whole field on foot and only found one stone. In recent years the local area has seen significantly heavy and repeated rainfalls, with four such storms in the 2019/20 season, measuring between 50 and 100mm falling onto already saturated land and resulting in widespread run-off and flooding. (*Department for Environment, Food & Rural Affairs 2020*). In relation to the surrounding area the Cotterell's site is high, therefore it should be preserved exclusively for agriculture, especially growing food.

This is strongly evidenced by the work of Sir James Bevan, Head of the Environmental Agency, who recently told the annual conference of the Association of British Insurers that **"extreme flooding in UK indicates urgent need for change. Much higher sea levels will... make much of our land surface uninhabitable or unusable. In recent years several of the 'reasonable worst case scenarios' which the EA has responded to have**

happened in the UK, with more extreme weather and flooding." Bevan urged politicians to take action to reduce emissions and adapt to the 'inevitable' impacts of the climate emergency.

"That is why our thinking needs to change faster than the climate and why our response needs to match the scale of the challenge. The net effects will collapse ecosystems, slash crop yields, take out the infrastructure that our civilisation depends on, and destroy the basis of the modern economy and modern society."

In November 2021 the UK is hosting the Cop26 climate change conference in Glasgow, with delegates and climate experts attending from around the world. Their aim is to drive action forward on adapting to the impacts of the climate crisis, reduce emissions and protect and restore nature.

The NDP should abide by this vision for the good of all, especially by preserving already proven farmland.

CONCLUSIONS

- All the Objections above clearly demonstrate that it would not be beneficial to the community to build new housing on this farmland, nor numerically necessary.
- This Proposal should never have found its way into the NDP and should be withdrawn. It is badly thought through and against National Policy.

Kathy Priddis

February 2021

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 15 March 2021 08:27
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Address	
Postcode	
First name	Michelle
Last name	Mcdonald
Which plan are you commenting on?	Bridstow neighbourhood
Comment type	Objection
Your comments	<p>I would like to make the following comments on the Bridstow Regulation 16 stage plan. I believe the intention to build 26 new houses within a mile radius of each other in this small area of the hoarwithy road out numbering the existing properties in this rural area is indefensible and disproportionate. Bridstow is a rural village in an aonb and this plan is turning a small area into a housing estate. There are no amenities in this immediate vicinity, no pavements and a dangerous pinch point to get to the A49. I also believe that with reference to the Oaklands plot in particular, to build behind existing road frontage properties is completely irresponsible and lacks imagination and planning. I can't help but wonder why more plots weren't identified nearer to the few amenities Bridstow has surely this would be common sense. Yours sincerely Mrs M Mcdonald</p>

Mr Mrs Alalami

17 March 2021

**Neighbourhood Planning Team,
Planning Services
BY EMAIL**

OBJECTION to

Regulation 16 plan stage

Bridstow Parish Council Neighbourhood Development Plan submitted to Herefordshire Council on 21st January 2021.

Dear Sir/Madam,

We would like to question the need for any further housing at all in the Buckcastle Hill area. The number of dwellings requested by Herefordshire Council was initially 57. During the period 2011 to 2018, 20 dwellings were given planning permission, leaving a requirement of 37. **Taking away the 8 dwellings recently given permission for at Littlefields** (omitted from the above plan), together with 25 given as Windfall and part of an agreement with Ross-on-Wye Council (Table 1, pg 47 Bridstow Neighbourhood Development Plan), we see very little need for the huge number of proposed dwellings at The Cotterells, Oaklands, and Foxdale (a total of 16 dwellings). In addition, the suggestion that 74 dwellings give flexibility to the plan, is disproportionately excessive and unnecessary when we can see just an extra 4 dwellings are needed.

The original proposed quota by Herefordshire Council was 35 dwellings in Bridstow and 20 in Wilton. If there are clear reasons why you cannot develop further in Wilton, by grouping the quota for the whole parish it leaves a disproportionate quota to be found in Bridstow. We respectfully suggest that the quota requirement of Herefordshire Council should be reduced for this parish to reflect the reduced total area available.

Drawing attention now to the developments proposed at Buckcastle Hill, these proposals in this NDP will undoubtedly change the nature of this part of Bridstow to that of a substantial housing estate, with many more houses than this area should absorb. In addition, these developments would be detrimental to this designated AONB. The subsequent noise and light pollution, together with increased traffic, will overwhelm and drown the existing character and amenity and have a long term, detrimental impact on Bridstow as a whole.

In section 3.5 of the Bridstow Neighborhood Development Plan November 2020 it states:

“The fact that the whole of the Parish falls within the Wye Valley AONB means that considerable weight is to be given to conserving and enhancing its landscape and scenic beauty, in that it is an area that should have the highest status of protection. This should also include the conservation of its wildlife and cultural heritage. In this regard, major development should be refused unless there are exceptional circumstances where it can be demonstrated to be in the public interest.”

We can see no evidence that development in Bridstow is required due to exceptional circumstances.

It has been repeatedly pointed out in response to numerous planning applications in this area, that the road running through Buckcastle Hill does not have the capacity to safely cope with the increase of traffic that these proposals will cause. The centre of Bridstow Village, where Bridstow Primary School, Village Hall, and church are located, are quite far and not safely accessible by foot from this area. We note that in section 3.21 of the NDP, the council will, “...encourage more walking and cycling to school and reduce the numbers of short distance car journeys.” This target will not be achievable if the developments in Buckcastle Hill go ahead. This fact, together with the absence of all other usual community facilities, means it cannot be escaped that vehicles will be a requirement for any new dwellings in the area. Specific points of concern are as follows:

- The road is a narrow, rural road which is *already* subject to high volumes of traffic it was not intended for.
- There are no pavements and few places in which to create pavements.
- There are areas of road which are not wide enough for two large cars to pass each other, never mind the regular large farm vehicles that move up and down this road.
- The road has a speed limit of 30 mph but vehicles often drive above that limit and on many occasions excessively so.
- The risk of injury to pedestrians and cyclists using this road is already high, and it would increase substantially with the proposed developments.

All these issues have been raised before in many previous planning applications, and unsuitable roads are mentioned as a reason for rejection of those applications. We would ask the Council to review the objections made to planning applications around the Claytons area, and Foxdales. There are many points to consider but we draw your attention to a proposal rejected in part because *“By virtue of its rural nature, the local highway network is not conducive to improvements to provide safe and convenient routes for pedestrians and cyclists and the introduction of additional traffic.”* The same concerns apply to the entire Buckcastle Hill area and therefore these development proposals should also be rejected.

In conclusion, we question the need for any further development at all, and in any event believe that the Buckcastle Hill area is not fit as a site for the NDP.

Yours faithfully

Mr Mrs Alalami

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

05 March 2021

Dear Sir

Draft Bridstow NDP: Regulation 16 Consultation

I am resident of the parish and writing to comment on the Bridstow NDP Regulation 16 consultation.

I note firstly that this consultation has not been widely publicised within the parish, which is a failing of the Parish Council. I would urge the consultation to be extended following proper publicity.

While some of the draft NDP seems reasonable, there are a number of points that need to be addressed and rectified.

1. Objection to Proposed Developments in Buckcastle Hill, especially at Cotterell's Farm

Size and placement of development sites

The results of the residents' questionnaire show clearly that people of the parish want to have developments of limited single plot residential homes (66% of respondents) or small groups of 2 to 4 dwellings (66%). This was endorsed by the Parish Council a couple of years ago at a meeting of the Working Group, in which they stated no sites should be more than 5 houses. Further, this has been reiterated constantly over the years that the NDP has been in development.

Therefore, the NDP should not put forward developments of more than 5 houses.

The size of the proposed development at Cotterell's Farm falls under the definition of a major development, but this is not acknowledged. The whole of Bridstow is in an AONB, and a major development should not be endorsed, as there are no exceptional circumstances to support it.

Especially when taken in consideration with the development site across the road (Greenfields), this represents:

- A very large development
- On the fringes of the village
- Completely out of keeping with the current housing pattern (which is mainly linear, following the road frontage).

Incredibly, it is described that this site would have “a signature building reflecting a gatehouse” at the entrance to the development. This illustrates very clearly that the development would be completely out of keeping with the character of the village and this AONB, particularly in the context of Buckcastle Hill, which is surrounded by farmland. We do not want a suburban gated community spoiling the character of this village.

Therefore, the NDP should take out the site at Cotterell’s Farm.

Road safety

Road safety is an important issue throughout the whole of the parish, with many narrow lanes and tight corners, as well as busy main roads bisecting the parish. The draft NDP itself acknowledges “Residents of both Claytons and Buckcastle Hill travelling towards Ross-on-Wye must negotiate a narrow pinch point in the Hoarwithy Road just to the south of Pool Mill Bridge where poor visibility makes it particularly dangerous for pedestrians”. In fact, the whole of the road from Buckcastle Hill through to the A49 has a number of dangerous pinch points and corners, with no footpath. It is dangerous for pedestrians and cars alike, with numerous problems, especially when buses and lorries are trying to pass.

Astonishingly, the draft NDP is proposing a large number of houses up Buckcastle Hill, which will drive up the number of cars at least 3-fold (considering that each new house will have at least 2 cars). This is irresponsible and will make it even more dangerous for parents to walk their children to school (Bristow Primary School), or for older children to walk safely on their own to the bus stop (for the secondary school).

In particular, the site at Cotterell’s Farm falls outside of the 30 mph limit and access to / from the site would be extremely dangerous.

Therefore, the NDP should take out the site at Cotterell’s Farm and give consideration to decreases the houses at other sites in Buckcastle Hill.

2. Objection to Area of Special Character (Buckcastle Hill)

There is nothing in the draft NDP to explain why this has been designated as an Area of Special Character. In fact, many other parts of Bridstow could be considered an area of special character for different reasons. Why is this area deemed special?

3. Wilton

The draft NDP is imbalanced in the proposal for developments in Wilton vs. Bridstow. In fact, a number of sites had been put forward in the past for Wilton, including a brownfield site that has good accessibility to footpaths and the town of Ross. This site is relatively close to the A49. However, it could be well designed to minimize traffic noise etc. and would make a suitable site for 5 starter homes. An attractive, illustrated proposal was submitted to the Working Group a few years ago, which was agreed at the time to be a good proposal. This should be reintroduced back in the NDP.

4. Response to Youth Forum Views

The draft NDP contains no actions in response to the Youth Forum data. The authors of the NDP state that the Forum was held, but they offer nothing in response to the requests that were made by the young people of this parish. This needs to be addressed.

5. Response to Bridstow CE Primary School Views

The draft NDP contains no actions in response to the school's comments, eg, requesting solutions / improvements to parking for parents collecting their children (currently it is very dangerous parking down the road) and on the creation of a path linking the school to the church (so children do not have to walk down a dangerous road for church celebrations). This needs to be addressed, particularly in light of the proposed development for houses along this road, which will increase traffic and make it even more dangerous for children and their parents.

6. Other Aspects of the NDP

When the NDP process was initiated, the people of the parish were encouraged that the NDP would help address a number of issues in the village. One of the main problems that people wanted to be addressed was the lack of footpaths. These would help parents walk children to school, and encourage use and enjoyment of the countryside. The NDP needs to have a clear policy specifically for footpaths, with all developments obliged to contribute to the footpath network in the parish.

Yours sincerely

Nicola La Grue

Our Ref: MV/ 15B901605

17 March 2021



Herefordshire Council
neighbourhoodplanning@herefordshire.gov.uk
via email only

Dear Sir / Madam

**Bridstow Neighbourhood Plan Regulation 16 Consultation
February – March 2021
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document 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, so it can reach homes and businesses.

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.

Response

We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning their networks.

Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.



To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.

We would be grateful if you could add our details shown below to your consultation database, if they are not already included:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

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

Spencer Jefferies, Town Planner

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

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

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

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:

Avison Young (UK) Limited registered in England and Wales number 6382509.
Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS



- National Grid's Plant Protection team: 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: 17 March 2021
Our ref: 346181



Herefordshire Council
neighbourhoodplanning@herefordshire.gov.uk

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

T 0300 060 3900

BY EMAIL ONLY

Dear Mr. Latham,

Planning consultation: Bridstow Neighbourhood Development Plan - Regulation 16

Thank you for your consultation on the above.

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.

Habitat Regulations Assessment – Stage 1 Screening

Natural England notes that your authority, as competent authority under the provisions of the Habitats Regulations, has screened the proposal to check for the likelihood of significant effects.

Your assessment concludes that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur, either alone or in combination. This conclusion has been drawn having regard for the measures built into the proposal that seek to avoid all potential impacts.

On the basis of information provided, Natural England's advice is that this proposed development may contain (or require) measures intended to avoid or reduce the likely harmful effects on a European site, which cannot be taken into account when determining whether or not a plan or project is likely to have a significant effect on a site and requires an appropriate assessment (following the *People Over Wind* ruling by the Court of Justice of the European Union).

For this reason, we advise that on the basis of the information supplied that the application may have a likely significant effect on the site. These measures therefore need to be formally checked and confirmed by your Authority, as the competent authority, via an appropriate assessment, in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended). These measures, and any additional measures that can avoid or reduce any likely harmful effects, can be considered as part of the appropriate assessment, to determine whether a plan or project will have an adverse effect on the integrity of the European site.

Natural England advises that it is a matter for your Authority to decide whether an appropriate assessment of this proposal is necessary in light of the *People Over Wind* ruling. In accordance with the Conservation of Habitats and Species Regulations 2017 (as amended), Natural England must be consulted on any appropriate assessment your Authority may decide to make.

We note that the HRA has screened out likely significant effects, concluding that allocations are not near a watercourse and the scale of growth not having an appreciable effect. Natural England do not agree with this conclusion.

The Neighbourhood Plan is allocating for a certain number of houses within the Bridstow area and appears to be connecting to mains drainage, in the form of Lower Cleeve Waste Water Treatment Works. The sewage treatment works and waste water will eventually discharge to the River Wye SAC. Therefore, there is an environmental pathway here to be considered between the proposed development and the watercourse, which would result in a likely significant effect on the River Wye SAC. The Plan also has a reliance on Policy SD4 of the adopted Core Strategy, to make development acceptable, which is also considered a form of mitigation.

It is recommended that this be assessed at Appropriate Assessment stage, to show how the above mentioned works can adequately mitigate the proposed development.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 281 (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Yours sincerely

Rebecca Underdown
Planning for a Better Environment Team



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

Your ref:
Our ref:
Email: Sarah.faulkner@nfu.org.uk
Direct line: 01952 400500
Date: 11/03/2021

Dear Sir,

Bridstow Neighbourhood Development Plan Consultation – NFU Response

The West Midlands NFU welcomes the opportunity to comment on the Bridstow Neighbourhood Development Plan. The West Midlands NFU represents approximately 5400 Farmers and Growers across the West Midlands region and over 50,000 farmers and growers nationally. In Herefordshire we represent over 1000 farmers and landowners. Our response is given below along with some key priorities.

As you will be aware the farming community continues to face formidable challenges with increasing regulation, volatile markets and fluctuating farming returns. In response to these challenges farmers have had to consider the resources available to them and look at new ways of developing their businesses so that they can grow and remain competitive. This might include the need for modern agricultural buildings either to meet regulations or to change the use of existing buildings in order to respond to changing market demand.

Our vision for the area is:

Bridstow is a sustainable rural community that is underpinned by an innovative rural economy, and thriving farming and food industry, which is profitable and supports viable livelihoods, underpins sustainable and healthier communities and enhances the environmental assets that are vital to the counties prosperity.

Food production is a key priority for economic growth both nationally and is vitally important in a rural area such as Bridstow. Therefore for the farming community the vision above can be achieved by the following themes:

1. Strengthening our farming businesses to help them build profitability and respond to new opportunities

2. To create thriving localities that meet the needs of their communities, businesses and their environment.
3. Realising the value of the region's environmental assets

In addition we would see some of the key priorities for farms to include (not in order of priority):

1. The ability for the next generation to take on management of farms and to support this through the provision of affordable housing to allow succession.
2. Develop farming enterprises that can meet the challenges of food security through modernising and becoming more efficient
3. Diversifying farming enterprises to meet new opportunities such as, *inter alia*, business units or tourism.
4. Developing renewable energy which meets the needs of the farm and are appropriate to the location and renewable resources available.
5. Access to high speed broadband and mobile phone coverage.

Diversification is in line with National Planning Policy Framework (NPPF) that provides that local authorities should support development that enables farmers to become more competitive and sustainable and diversify into new opportunities. A key message within the NPPF is the need for economic growth, paragraph 80 states that "*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.*"

Bridstow neighbourhood plan has the opportunity to help support farms diversify and create new employment and income opportunities for the area. These will range from the provision of business units through to farm shops.

The NPPF also covers "*Supporting a prosperous rural economy*". Paragraph 83 states that "*Planning policies and decisions should enable:*

- a) *the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;*
- b) *the development and diversification of agricultural and other land-based rural businesses;*

c) sustainable rural tourism and leisure developments which respect the character of the countryside”

Paragraph. 84 goes on to state that *“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport).*

The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”

In the NPPF the government makes a number of very important statements related to the development of renewable energy. Paragraph 151 states that *“To help increase the use and supply of renewable and low carbon energy and heat, plans should:*

a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts)

b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and

c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.”

Renewable energy represents an important opportunity for farms to reduce their energy bills and also to create revenue that can help support farming activity. We understand that this can be a contentious issue within communities as has been highlighted by the government with the policy it has introduced for requiring areas to be identified for wind development in local or neighbourhood plans such as yours. Some of our members will be looking to erect wind turbines for electricity to be used on farm at a very small scale. We ask that you consider the issue of scale and how you can support our farmers.

Succession within farming businesses is often critical to their ongoing sustainability. This will often require the need for additional housing to enable the next generation to take over the farming enterprise and to allow the current generation to take a less involved role. We ask that the neighbourhood plan supports farms to build new housing.

To help guide any work we have developed some principles which we believe will help Bridstow shape any activity in the area. These are:

- Food security is a crucial issue for now and the future and any actions must ensure that we do not compromise our ability to feed ourselves
- We should look to increase farm productivity and decrease impact on the environment.
- The achievement of sustainable development in rural areas through the integration of environmental, social and economic objectives.
- Meet the needs of a diverse rural population and ensure equality of opportunity.
- Maintain and enhance the areas natural asset base.
- Farmers and landowners should always be consulted and listened to with regard to developing the area.
- Support sustainable growth in the rural economy.
- Sustainable farming will support the wider community.
- Not one system of farming is the answer and all should be supported for maximum benefit to society and the environment
- Encourage links between rural areas and urban centres.

Many thanks for the opportunity to respond to this consultation and we hope that these comments are helpful and will be taken into account.

Yours faithfully

Sarah Faulkner
Regional Environment Adviser

Latham, James

From: HALL, Jo (NHS HEREFORDSHIRE AND WORCESTERSHIRE CCG) <jo.hall@nhs.net>
Sent: 17 March 2021 18:30
To: Neighbourhood Planning Team
Subject: FW: Bridstow Regulation 16 submission neighbourhood development plan consultation

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Thank you for notifying Herefordshire & Worcestershire Clinical Commissioning Group (CCG) of the consultation on Bridstow Parish Council's Regulation 16 Neighbourhood Development Plan

Herefordshire & Worcestershire CCG has no direct comment on the plan, but welcome the policy promoting improved broadband and telecommunications infrastructure which is of benefit to the provision of healthcare into rural communities.

Jo Hall
Primary Care Commissioning Manager
NHS Herefordshire and Worcestershire
Clinical Commissioning Group
Email: jo.hall@nhs.net, team: hw.primarycare@nhs.net
Mobile: 07843 505097

Normal working days: Tuesday, Wednesday, Thursday

Our ref: SGL/782/001

Date: 09 March 2021

Herefordshire Council
NDP Team
Council Offices
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HR1 2ZB



Singleton Court Business Park
Wonastow Road
Monmouth
NP25 5JA

Telephone: 01600 714140
Fax: 01600 716744
Website: www.powellsrural.co.uk

Dear Sir/Madam,

Land West of Land Acre, Bridstow, Ross on Wye – Regulation 16 NDP Consultation Formal Representations

Further to the ongoing Regulation 16 NDP consultation, Powells have been instructed on behalf of their client Mr Webb to prepare and submit the enclosed submissions to the consultation.

In short summary, our client's land has been excluded from the proposed settlement boundary revision, when its inclusion is clearly logical. The proposed allocation of land to the north of our clients land is actually on a higher elevation and is clearly considered acceptable for residential development. We ask the NDP team request a variation to the draft NDP to include our clients land hatched in blue within Appendix 1 to the enclosed report within the settlement boundary. We also ask the NDP team to seek a policy wording change to require the proposed allocation off Banutree Lane to include vehicle and pedestrian access from the proposed allocation south of Banutree Lane into our clients land to safeguard its future development.

Yours sincerely,

Stuart Leaver BSc (Hons) MSc MRICS FAAV

Associate Director

For and on behalf of Powells Chartered Surveyors, Land & Estate Agents

Email: stuart.leaver@powellsrural.co.uk

Mobile: 07912 091480

Encs: NDP Representations



Planning & Compulsory Purchase Act 2004
Formal Consultation Response

Relating to

**The Bridstow Parish Council Regulation 16 Neighborhood
Development Plan Consultation**

On behalf of

Mr T Webb
ADDRESS REDACTED

Prepared by

Powells Chartered Surveyors
Singleton Court Business Park
Wonastow Road
Monmouth
NP25 5JA

March 2021



Foreword

Powells as Chartered Surveyors, Development Agents and Land Promoters act for a landowning client within the Bridstow Parish Area with development land interests. We believe the NDP is drafted to prevent sustainable development from being delivered on our clients property, materially harms Herefordshire Councils ability to meet its objectives under the Core Strategy and disregards material factors such as Housing Land Supply. We believe the plan policies should be subject to the proposed variations within Table 1 to this report and the settlement boundary should be adjusted to include our clients property as per Appendix 1 to this report.

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1. Introduction

1.1. Powells have undertaken an assessment of the draft NDP and below we set out our required revisions to the policy in order to achieve the Parish' policy objectives, without creating a barrier to development. It is important that Herefordshire Council NDP team and future Planning Inspector fully consider our proposed policy revisions in order to ensure the proposed Regulation 16 NDP does not conflict with the policy objectives of the Core Strategy. We believe as it stands, the wording of the draft is in conflict with the Core Strategy and National Planning Policy Framework. By making the below changes in policy wording, this reduces the conflict between the NDP as a subordinate document to the Core Strategy and NPPF.

2. The National Planning Policy Framework (NPPF)

2.1. Paragraph 68 of the NPPF states:

2.1.1. *“small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly. To promote the development of a good mix of sites local planning authorities should:*

2.1.2. *a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;*

2.1.3. *b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;*

2.1.4. *c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; a*

2.1.5. *d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.*

2.2. Paragraph 78 actively encourages the siting of dwellings where it will support local services and enhance local vitality. Local services in the context of Bridstow being school, and associated facilities within adjoining Wilton.

2.3. Paragraph 79 is not entirely relevant where considering the allocation of housing sites, or where the Core Strategy policy RA2 confirms development within or adjacent to a settlement is applies to the site in question. In that instance, such a site would only be considered open

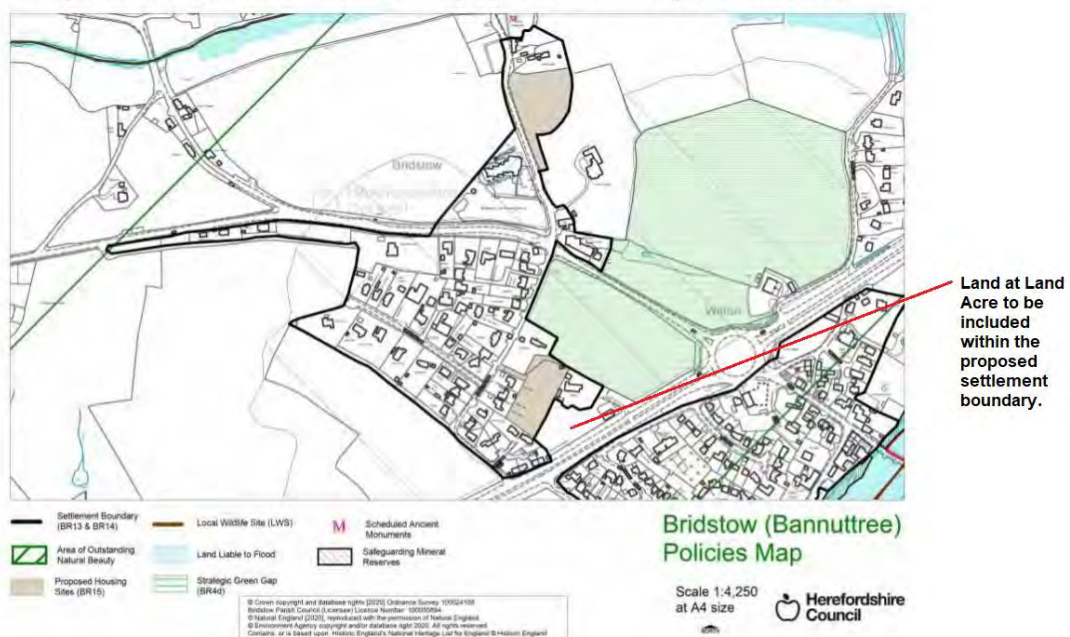
countryside where it does not meet the policy criteria of RA2. The NDP cannot seek to conflict with the Core Strategy.

3. **Regulation 16 NDP Policy**

3.1. We believe that the NDP should seek to align with the specific wording of paragraph 68(c) of the NPPF and therefore enclose Land Acre within the village settlement boundary for Windfall development. Failing this the NDP should expressly state the land at 'Land Acre' should be considered suitable for a windfall site for residential development for market housing in line with policy RA2 (i.e not only housing under policy RA3 of the Core Strategy as the NDP is encouraging on windfall sites). The NDP policy should go as far as stating that the adjoining proposed allocation to the north would require a provision in its design to require suitable vehicle and pedestrian access into the land at Land Acre as edged and identified on the plan in **Appendix 1** as being land hatched in blue.

3.2. The easiest and most straightforward option would be to include the property Land Acre within the proposed settlement boundary for the village, and make a policy provision to require an access way to be incorporated between the proposed Bridstow allocation south of Banutree Lane, into the land at Landacre as edged and hatched in blue on the plan forming **Appendix 1** to this document. We believe this provision should be incorporated into Policy BR14 (Housing Development in Bridstow). We set out a schedule of proposed revisions to the NDP policy in **Table 1** below.

Map 3: Bridstow Policies Map (Bannuttree) (Not to scale)



4. Herefordshire Core Strategy Policy RA2

4.1. The Herefordshire Core Strategy Policy RA2 sets out the LPA's policy position in respect of Housing in Settlements outside Hereford and the market towns. The policy position is as follows:

Policy RA2 – Housing in settlements outside Hereford and the market towns.

To maintain and strengthen locally sustainable communities across the rural parts of Herefordshire, sustainable housing growth will be supported in or adjacent to those settlements identified in Figures 4.14 and 4.15. This will enable development that has the ability to bolster existing service provision, improve facilities and infrastructure and meet the needs of the communities concerned.

The minimum growth target in each rural Housing Market Area will be used to inform the level of housing development to be delivered in the various settlements set out in Figures 4.14 and 4.15. Neighbourhood Development Plans will allocate land for new housing or otherwise demonstrate delivery to provide levels of housing to meet the various targets, by indicating levels of suitable and available capacity.

Housing proposals will be permitted where the following criteria are met:

1. Their design and layout should reflect the size, role and function of each settlement and be located within or adjacent to the main built up area. In relation to smaller settlements identified in fig 4.15 proposals will be expected to demonstrate particular attention to the form, layout, character and setting of the site and its location in that settlement and/or they result in development that contributes to or is essential to the social well-being of the settlement concerned;
2. Their locations make best and full use of suitable brownfield sites wherever possible;
3. They result in the development of high quality, sustainable schemes which are appropriate to their context and make a positive contribution to the surrounding environment and its landscape setting; and
4. They result in the delivery of schemes that generate the size, type, tenure and range of housing that is required in particular settlements, reflecting local demand.

Specific proposals for the delivery of local need housing will be particularly supported where they meet an identified need and their long-term retention as local needs housing is secured as such.

4.2. Policy RA2 clearly states NDP's WILL BE REQUIRED to allocate suitable land for housing to meet the relevant targets. The relevant target for the Ross on Wye Housing Market Area (HMA) is 14% growth during the plan period. The policy places a MINIMUM growth target on each HMA. Any proposal to develop NDP policy which would prevent the open delivery of housing where it complies with RA2 would conflict with the Core Strategy, especially where that land is within the curtilage of an existing residential property. **Our proposed revision to proposed draft policy BR14 below in Table 1 would align NDP policy with the Core Strategy and the NPPF.**

5. Housing Land Supply (5yhls)

5.1. The recently published LPA 5yhls figure within their Annual Monitoring Report (AMR) demonstrates a figure of 3.9 years of supply. The policies relating to the delivery of housing in the authority area are therefore considered out of date and carry less weight. An NDP will not lose its material weight until the LPA's 5yhls is 3 years or less, or where the NDP is older than 2 years from adoption and the LPA has less than a 5yhls. The fact the LPA are failing to deliver sufficient housing is a material consideration in the planning balance under Paragraph 11(d) of the NPPF. A copy of the AMR is appended to this report and shall be provided to an Inspector at submission stage. We believe adopting the NDP without adopting our proposed

changes within **Table 1** and our settlement boundary plan attached to **Appendix 1** would essentially mean the NDP does not comply with the Core Strategy or the NPPF.

6. **Government White Paper (WP)**

- 6.1. Fundamental are the possible changes to the planning system contained in the White Paper, 'Planning for the Future' published in August 2020. This proposed a major change to Local Plans and to Development Management. The WP is the subject of consultation until 29th October after which further information is expected. It has generated much comment and debate.
- 6.2. We believe the housing need for Herefordshire generally will significantly increase as a result of any adoption of WP housing need policy proposals. As such, the LPA needs to ensure NDPs do not impose restrictions on the LPA's ability to deliver housing.

7. **Conclusion**

7.1. *As it stands, we consider the following to be the case:*

7.1.1. *We consider the Bridstow Parish Council draft NDP proposed settlement boundary and related policies to be unsound because of being inconsistent with the Core Strategy and the NPPF. Land has been excluded to the south of the settlement, north of the A40 at Land Acre, which must be included within the revised settlement boundary.*

7.1.2. *Our proposed revisions to NDP policy are marked below in **Table 1** and proposed revision to the Bridstow settlement boundary on the plan in **Appendix 1** would assist with making the proposed policy more sound and in line with the Core Strategy and NPPF.*

7.1.3. *Herefordshire Council is failing to deliver the required number of dwellings in the Authority Area and the south of the county needs to take up the lack of delivery in the north of the county. The LPA need to maximise opportunities within the existing settlement.*

7.1.4. *Herefordshire Council 5yHls issue is exacerbated by NDP's which are too restrictive and conflicting with policy RA2 and the Core Strategy generally and as such are damaging the Councils ability to deliver the required numbers of housing to meet its HMA targets.*

7.1.5. *The UK Government White Paper is material to the development of the NDP, and with a likely increase in Objectively Assessed Need (OAN) through a Core Strategy review the NDP needs to create flexibility in the plan to accommodate an increased housing need and minimum target.*

7.1.6. *We do not consider that the current Regulation 16 draft NDP should progress to Examination stage until our proposed revisions in **Table 1** and **Appendix 1** have been made.*

TABLE 1 – PROPOSED REVISIONS TO DRAFT NDP POLICY WORDING

(Red text demarks proposed policy revisions or deletions)

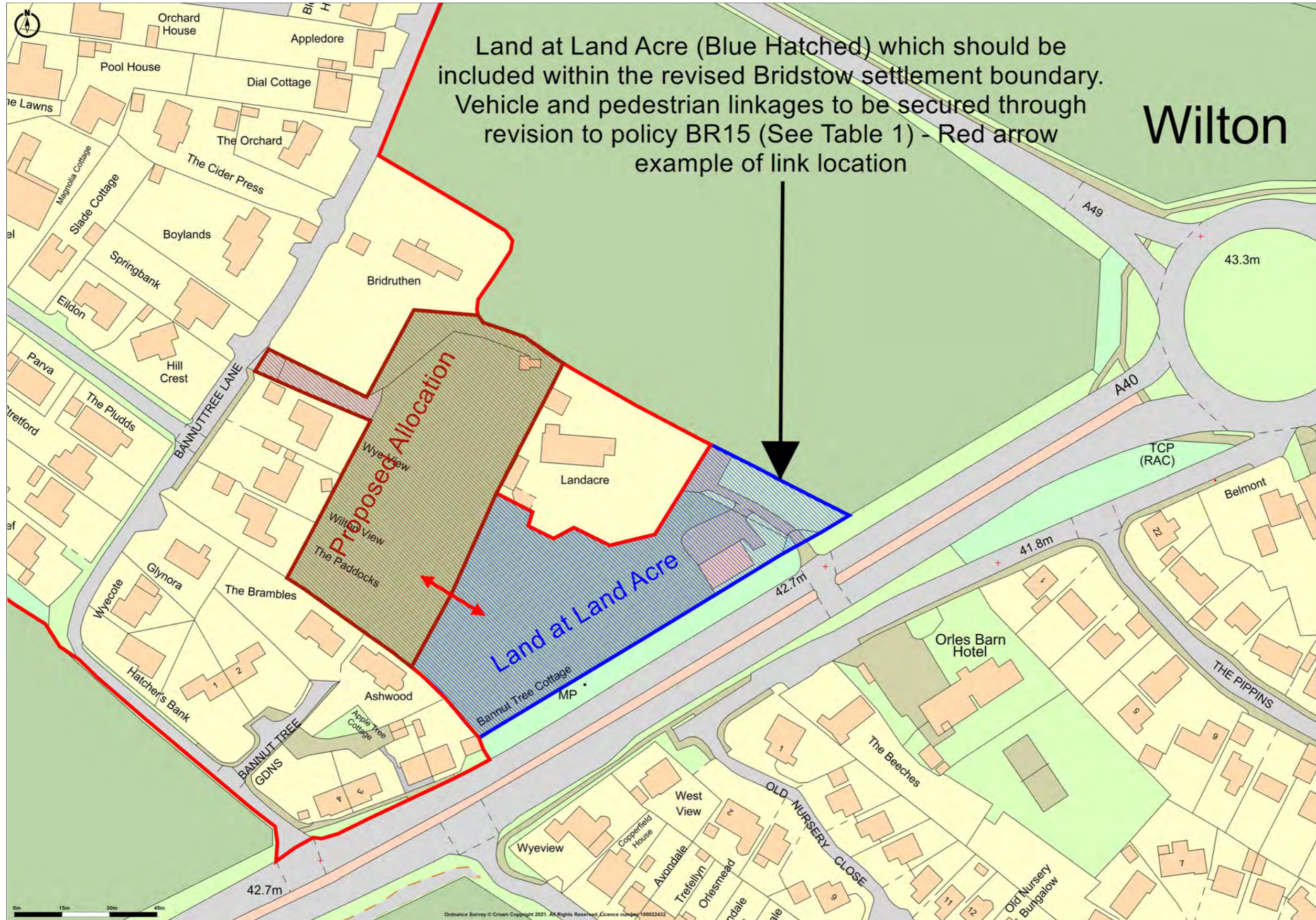
<i>Policy Ref</i>	<i>Policy Name</i>	<i>Policy Wording & Proposed Changes</i>
<i>Policy BR2</i>	Development Strategy	<p>The settlements of Wilton and Bridstow will be the focus for development within the Parish. The level and extent of development will meet the required level of proportional housing growth within the Ross on Wye HMA overall while ensuring this occurs within local environmental capacities and other constraints. Limited smallscale employment opportunities will be promoted through enabling appropriate forms of rural enterprise. In all instances there will be an emphasis on protecting the landscape quality, beauty, character and features of the Wye Valley AONB. There will also be emphasis on protecting high grade agricultural land. The accommodation of development to meet the needs of the Parish and contribute to County requirements will be based upon the following approach:</p> <p>a) A settlement boundary is defined for Wilton within which new housing and other appropriate forms of development may take place. The settlement’s local distinctiveness will be retained, and the character and appearance of its Conservation Area will be conserved or enhanced.</p> <p>b) Development boundaries are defined for the areas comprising Bridstow, including Buckcastle Hill, Claytons and Bannuttree. Within these, small sites are allocated for development and infilling may take place where it retains the scale, character and local distinctiveness of the areas concerned. The settlement will continue to accommodate community facilities serving the Parish. In Bridstow particularly where land is allocated and clearly provides the logical point of access to further adjoining parcels of land for further small scale development provision should be made in any design to provide vehicle and pedestrian linkage between the sites to safeguard future delivery of suitable housing sites.</p> <p>c) Housing development outside of the settlement or development boundaries identified above should be exceptional and located in accordance with relevant policies in Herefordshire Local Plan Core Strategy, in particular but not exclusively Policy RA3, and where necessary the more detailed policies in this Neighbourhood Plan. The countryside will continue to accommodate economic development and particularly that associated with agricultural, tourism and other rural enterprises where these reflect the scale and nature of the landscape within which they sit, protect local amenity and can be accommodated on the road network.</p>
<i>Policy BR6</i>	Enhancement of the Natural Environment	<p>New development should conserve natural assets in accordance with the requirements of Herefordshire Local Plan Core Strategy Policy LD2. Developers should ensure there is a net gain to biodiversity by, where possible and appropriate, enhancing the distinctiveness, condition and extent of ecological corridors along the River Wye, Wells Brook and the tributary to that Brook. Other measures to improve connectivity within the</p>

		local ecological network will be sought through creating, retaining and enhancing important natural habitats and features such as tree cover, ponds, orchards and hedgerows where practical to do so . There should be a net gain in biodiversity, and the loss of any features, where absolutely necessary , shall be offset through full but proportionate compensatory measures.
<i>Policy BR8</i>	Sewerage and Sewage Infrastructure	In respect of development seeking to connection to mains sewer , should there be a temporary lack of capacity at Ross Lower Cleeve WwTWs development upon sites may need to be delayed until such time as works are carried out to provide sufficient sewage treatment capacity. Developers may contribute towards remedial works to the WwTWs in order to expedite any under-capacity and to advance their proposals more swiftly. Development sites with non mains drainage solutions will be permitted but should comply with policy SD4 of the Herefordshire Core Strategy.
<i>Policy BR14</i>	Housing Development in Bridstow	Development boundaries are defined for Bridstow shown on Bridstow Village Policies Maps comprising the areas of Bannuttree, Buckcastle Hill and Claytons. Sensitive Infilling within these boundaries and on small sites identified for development shown on Bridstow Policies Maps will be supported. Within the development boundaries housing development, including alterations and extensions to existing dwellings, will be permitted where it meets the following criteria: a) Dwellings shall be of a scale, massing, density and layout compatible with the character, size and form of the area of the settlement defined by the development boundary within which they are located and should not adversely affect the amenity of adjacent properties. b) In relation to the Area of Special Character at Buckcastle Hill, regard should be had to policy BR16. c) Development shall avoid limit the loss of important features such as trees, hedgerows, or significant frontage gaps that contribute to the character of the village where possible. Where natural features are lost, appropriate and proportionate compensatory measures shall be included within any proposal. d) Development shall seek to limit any adversely affect on important heritage assets within the village, including their settings. e) There should be safe access for vehicles, and parking arrangements should not detract from the village street scene but be an integral part of the overall design.
<i>Policy BR15</i>	Housing Sites in Bridstow Village	The following areas of land are identified on Bridstow Village Policies Map where new housing development may take place, provided they meet the requirements set out in relevant design and detailed policies within this plan:

		<p>i) Land amounting to around 0.45 hectares at Bridruthin, Bannuttree. (Should be revised to include the blue hatched land to the west of Land Acre as well as one larger allocation as per plan in Appendix 1).</p> <p>ii) Land amounting to around 0.4 hectares at the Old Vicarage, Bannuttree.</p> <p>iii) Land amounting to around 0.8 hectares at Oaklands, Buckcastle Hill.</p> <p>iv) Land amounting to around 0.4 hectares at Foxdale, Buckcastle Hill.</p> <p>v) Land amounting to around 1 hectare at Cotterell’s Farm, Buckcastle Hill.</p> <p>Land at Bridruthin, Bannuttree</p> <p>8.17 This site sits along the south side of Bannuttree Lane and is surrounded by development along most of its other boundaries. A relatively narrow field entrance provides access to a rectangular site sitting behind a number of other properties along the lane. The following requirements would reduce the effects of its development upon neighbouring properties and the setting of this part of Bridstow in accordance with policies in this NDP:</p> <ul style="list-style-type: none"> • A low-rise, low-density development, preferably of bungalows, would protect the residential amenity of neighbouring properties and be expected to generate limited traffic at peak hours. • To comply with policy BR10(c), a noise assessment should inform layout and housing design to minimise the effect of noise from the A40 upon dwellings. • A high-quality landscape scheme would ensure the development fits sensitively into the settlement and protect views from important vantage points in Ross-on-Wye in accordance with policy BR4. • A transport assessment will be required in accordance with policy BR12 to assess the impacts of development on the highway and mitigation be identified if required. • The development should be served by an access road to meet Herefordshire Council’s Highways Design Guide for New Developments. • A contribution of up to 8 dwellings towards the required level of proportional growth is expected from the development of this site. • Provision should be made in any site layout design to provide for access into the land at Land Acre to the south of the allocation for vehicle and pedestrian purposes into Land Acre to safeguard its future development potential through the NDP period.
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<i>Policy BR21</i>	Protection of Local Green Space and Areas of Open Space	<p>a) Land either side of Wilton Road abutting the River Wye identified on Wilton Village Policies Map and registered as 'village green' is designated as Local Green Space. Development that would result in the loss of openness of the area, or the loss or diminution of its use, quality as open space, or characteristics, including in association with adjacent development, will not be supported other than in very special circumstances. Policy proposed for deletion because this land is an open arable field with no public access. The land is not a village green and could provide a suitable site for development in the future.</p> <p>b) b) Areas of open space to be protected through Herefordshire Local Plan Core Strategy Policy OS3 include:</p> <ul style="list-style-type: none"> i) Amenity Open Space within the centre of Claytons Estate. ii) Amenity Open Space in the south-east corner of Ashe Green.

APPENDIX 1
REVISED PROPOSED SETTLEMENT BOUNDARY REVISION TO INCLUDE LAND AT 'LAND ACRE'



Land at Land Acre (Blue Hatched) which should be included within the revised Bridstow settlement boundary. Vehicle and pedestrian linkages to be secured through revision to policy BR15 (See Table 1) - Red arrow example of link location

Wilton

Appendix 2

HCC 2019 Annual Monitoring Report

Five Year Housing Land Supply (2020 - 2025)

Annual Position Statement at 1 April 2020

September 2020

5 Year Housing Land Supply Position Statement 2020

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1.0 Introduction

- 1.1 This Statement sets out an assessment of the housing land supply position in Herefordshire taking into account the requirements of the National Planning Policy Framework (NPPF) at 1st April 2020.
- 1.2 With the government's aim of achieving faster delivery of new homes, a new approach to the method of calculating five year supply was set out in national planning policy and guidance last year. The context to the updated national framework, as has been repeatedly cited by Government, is to address the severe issues of housing undersupply and affordability prevalent across the country. It is of no surprise therefore that there have been substantial policy changes relating to the delivery of housing and the more effective use of land. Changes in policy are intended to ensure homes are actually built.
- 1.3 The approach to engagement on this supply paper is explained in the relevant sections within this document.

2.0 Planning Policy

National Planning Policy Framework (NPPF)

- 2.1 The NPPF indicates that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years supply of housing against their housing requirements set out in adopted strategic policies or against the local housing need where the strategic policies are more than five years old (paragraph 73). The supply of specific deliverable sites should in addition include a buffer:
- 5% to ensure choice and competition in the market for land; or
 - 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
 - 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply¹.
- 2.2 Paragraph 75 sets out that to maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. This will be assessed by the Secretary of State in the *Housing Delivery Test* which is explained later.
- 2.3 NPPF Paragraph 11 sets out the presumption in favour of sustainable development for both plan making and decision taking. Paragraph 11d states 'where there are no

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

relevant development plan policies, or the policies which are most important for determining the application are out-of-date this means granting permission’.

- 2.4 Not being able to demonstrate a five year supply of housing land continues to be associated with policies that are ‘out of date’. This is clarified by Footnote 7 of the NPPF ‘where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73); ...or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years’ then granting permission is expected to be granted for sustainable development.
- 2.5 In emphasising the importance of the presumption in favour of sustainable development the NPPF is clear that the housing land supply position will need to be balanced against other factors in the development plan and/or NPPF which could result in the refusal of planning permission or restriction in development. Footnote 6 associated with paragraph 11 of the NPPF is helpful in stipulating those areas that the NPPF has in mind where development should be restricted. Such areas relevant to Herefordshire include:
- habitats sites (and those sites listed in paragraph 176²) and/or designated as Sites of Special Scientific Interest
 - irreplaceable habitats
 - land designated as Local Green Space
 - land designated as an Area of Outstanding Natural Beauty
 - land affected by designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63³)
 - land at risk of flooding
- 2.6 The latest NPPF contains an amended definition of ‘**deliverable**⁴’ sites. To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:
- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

² a) potential Special Protection Areas and possible Special Areas of Conservation;

b) listed or proposed Ramsar sites (see NPPF footnote 59); and

c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

³ Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

⁴ NPPF pg.66.

- b) where a site has outline planning permission for major development⁵); has been allocated in a development plan; has a grant of permission in principle; or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

2.7 The recent case of *East Northamptonshire Council v Secretary of State for Housing, Communities and Local Government*. Case Number: CO/917/2020⁶ set about establishing more precisely, what should be considered a deliverable site. This was the result of an appeal decision by a planning inspector whereby the council's 5 year housing land supply was lowered from 6.03 years to just 4.28 years. The case put forward by the council sought to emphasise that the correct test is whether there is a realistic prospect of housing being delivered on a site within five years. It was argued that the inspector should have gone on to consider whether sites which did not fall within one of the specific listed categories were "deliverable anyway".

2.8 The Secretary of State conceded that "the proper interpretation of the definition is that any site which can be shown to be "available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site will meet the definition"...". The examples given (in the NPPF glossary) are not exhaustive of all the categories of sites which are capable of meeting that definition. Whether a site does or does not meet the definition is a matter of planning judgement on the evidence available." This approach will be applied in the supply set out in this paper.

2.9 Once a 5 year housing land paper is drafted, it then needs to meet the requirements of paragraph 74 as this provides a new mechanism to allow a local planning authority to demonstrate a five year supply of housing sites. However it is worth noting this applies to more recently adopted plans as explained at paragraph 2.9 below.

2.10 'A five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan, or in a subsequent annual position statement which:

- a) has been produced through engagement with developers and others with an impact on delivery;
- b) considered by the Secretary of State; and
- c) incorporates the recommendations of the Secretary of State where the position on specific sites cannot be agreed during the engagement process.

⁵⁵ NPPF definition:- **Major development:** For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m² or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

⁶ *East Northamptonshire Council v Secretary of State for Housing, Communities and Local Government*. Case Number: CO/917/2020 <https://cached.offlinehbpl.hbpl.co.uk/NewsAttachments/RLP/CO009192020.pdf>

- 2.11 Footnote 38 of the NPPF states that ‘... a plan adopted between 1 May and 31 October will be considered ‘recently adopted’ until 31 October of the following year; and a plan adopted between 1 November and 30 April will be considered recently adopted until 31 October in the same year. Therefore only those Local Plans adopted in this timeframe will be considered acceptable for submission of their ‘Five Year Housing Land Supply Annual Position Statement’ to the Planning Inspectorate. Herefordshire Council’s Local Plan Core Strategy was adopted in October 2015 under the 2012 NPPF Framework and is therefore not suitable for submission. However, this supply paper has been approached as closely as possible to reflect the guidance.

The Housing Delivery Test

- 2.12 The NPPF states that “the Housing Delivery Test measures net additional dwellings provided in a local authority area against the homes required, using national statistics and local authority data. The Housing Delivery Test is carried out by Central Government and the Secretary of State will publish the test results for each local authority in England every November”. The results for 2019 were delayed and published in February 2020.
- 2.13 The ‘presumption in favour of sustainable development’ at paragraph 11 states that that the presumption will apply where housing delivery is below 75% of the requirement; in line with the Housing Delivery Test. There are transitional arrangements in place until the 75% target is applied. Paragraph 215 of the NPPF sets out these requirements:
- a) November 2018 - If delivery falls below 25% of housing required over the previous three years;
 - b) November 2019 - Indicate that delivery was below 45% of housing required over the previous three years;
 - c) November 2020 and in subsequent years - Indicate that delivery was below 75% of housing required over the previous three years.
- 2.14 Regardless of passing the test, paragraph 75 of the NPPF states that where delivery falls below the above figures or if delivery falls below 95% over three years from 2020 then authorities are required to prepare an *action plan* to assess the causes of under-delivery and identify actions to increase delivery. In addition to maintaining a deliverable 5 year housing land supply, the Housing Delivery Test imposes a major incentive to process housing applications as swiftly as possible and work with developers to speed up implementation and delivery.
- 2.15 Whereas five-year supply tries to forecast what will be built in the future, the Housing Delivery Test looks at what has actually been delivered. Where targets have been missed over the last three-years, a variety of consequences will apply depending on the severity of the shortfall.

2.16 The Housing Delivery Test result for Herefordshire was 80% for 2019⁷. Therefore as the result is less than 95% delivery rate, the Housing Delivery Test action plan for 2020 will be published shortly to address under delivery. In addition, as set out in paragraph 2.1 above there is a requirement to add an additional 20% on to the requirement as housing delivery in the County has fallen below 85% of the target for the past three years. Note that the housing completion rate for 2019-20 has increased considerably, is the highest recorded over the Core Strategy period and has resulted in the backlog being reduced. This is expected to be reflected in the Housing Delivery Test results for 2020.

Planning Practice Guidance (PPG)

2.17 The PPG Guidance was updated 13 Sept 2018 and again 22 July 2019. Local Planning Authorities are expected to be more transparent with regard to the information that is set out in the 5 year supply. Commentary on site progress including reasons for slow/fast rates of activity as well as build out rates are expected to be set out.

2.18 The following highlights the recent changes:

- Local Planning Authorities can have their Five Year Supply position confirmed by the Planning Inspectorate as long as they have a recently adopted Plan in line with Footnote 38 of the NPPF. Herefordshire Council does not have a recently adopted Plan in this case.
- The authority should engage with the typical stakeholders such as developers, landowners, land promoters and even utility providers.
- The authority needs to seek agreement on sites and the level of delivery.
- Authorities may wish to set up an assessment and delivery group which can assist authorities to not only identify any delivery issues but also help to find solutions to address them.

Site information required

2.19 Assessments need to be realistic and made publicly available in an accessible format as soon as they have been completed. As set out in the updated PPG paragraph 14, assessments will be expected to include:

- for sites with detailed planning permission, details of numbers of homes under construction and completed each year; and where delivery has either exceeded or not progressed as expected, a commentary indicating the reasons for acceleration or delays to commencement on site or effects on build out rates;
- for small sites, details of their current planning status and record of completions and homes under construction by site;
- for sites with outline consent or allocated in adopted plans (or with permission in principle identified on Part 2 of brownfield land registers, and where included in the 5

⁷ The result for 2018 was 74%

year housing land supply), information and clear evidence that there will be housing completions on site within 5 years, including current planning status, timescales and progress towards detailed permission;

- permissions granted for windfall development by year and how this compares with the windfall allowance;
- details of demolitions and planned demolitions which will have an impact on net completions;
- total net completions from the plan base date by year (broken down into types of development e.g. affordable housing); and
- the 5 year housing land supply calculation clearly indicating buffers and shortfalls and the number of years of supply.

2.20 The majority of the above actions have been addressed in this Annual Position Statement. Any remaining information such as affordable housing completions will be set out in the Council's most up to date Authority Monitoring Report (AMR).

Development Plan Position

2.21 The Herefordshire Local Plan - Core Strategy was adopted by Herefordshire Council on 16 October 2015. However the Council has now begun to update the Core Strategy in order to plan for a longer timescale up to 2041.

2.22 As a result of the lack of a five year supply the council issued an *Interim Statement* in *September 2016* setting out its position as a result of not having a five year land supply. Going forward the Council will be updating its Housing Delivery Action Plan to address the under delivery.

2.23 To date there has been good progress with the uptake of Neighbourhood Development Plans (NDPs) across the county. All Made Plans form part of the statutory development plan for the relevant parish area in conjunction with the Core Strategy. Further information on NDPs and their progress and contribution in the supply can be found at paragraph 4.42.

2.24 As the NPPF requires an annual update to the five year supply position of each local authority, this statement simply sets out the annual position at April 2020.

Neighbourhood planning and housing land supply policy guidance

2.25 Neighbourhood Plans support the strategic policies contained within local plans. The policies and allocations within Neighbourhood Plans provide an important source of housing supply.

2.26 Paragraph 14 of the revised NPPF (2019) refers to paragraph 11d whereby it states in situations where the presumption applies ...'where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date', it is expected that permission is granted unless there are other material matters. Therefore the presumption applies to applications involving the provision of housing, the adverse impact of allowing development that

conflicts with the neighborhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:

- a) The neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;
- b) The neighborhood plan contains policies and allocations to meet its identified housing requirement;
- c) The local planning authority has at least a three year supply of deliverable housing sites (against its five year housing supply requirements, including the appropriate buffer as set out in paragraph 73); and
- d) The local planning authority's housing delivery was at least 45% of that required over the previous three years.

3.0 Additional housing land supply matters

Impact of raised levels of phosphate within the River Lugg catchment (part of the River Wye Special Area of Conservation) upon residential developments

- 3.1 In Herefordshire, the River Wye and its tributaries are recognised as being of international importance for their unique character and wildlife, requiring the highest level of protection, management, enhancement and, where appropriate, restoration. Herefordshire Council as the 'competent authority' under the Habitats Regulations, (The Conservation of Habitats and Species Regulations 2017) is legally required to assess the potential impacts of projects and plans, on internationally important sites which include the River Wye SAC (Special Area of Conservation).
- 3.2 The River Lugg is a tributary of the River Wye and forms part of the designated site covering predominantly the north of the Herefordshire administrative area⁸. A list of parishes within the River Lugg hydrological catchment can be found at Appendix 6. The River Lugg is currently failing its conservation targets of phosphate levels as a result of water pollution from both 'point' source; in particular sewage outlets and 'diffuse' sources; agricultural run-off. In light of the Dutch Case⁹ developments which cannot demonstrate within a Habitat Regulation Assessment that they will not affect the integrity of the River Wye or have a likely significant effect' are unlikely to be acceptable.
- 3.3 See latest '*Position Statement*' with regard to development in the River Lugg catchment¹⁰. The elevated levels of phosphates within the SAC is currently preventing the approval of developments which could release any additional

⁸ Map of River (Special Area of Conservation) Lugg catchment

https://www.herefordshire.gov.uk/download/downloads/id/20536/map_showing_river_wye_and_river_lugg_sac_catchment_area_in_herefordshire.pdf

⁹ Dutch Case Cooperatie Mobilisatie handed down in November 2018 by the Court of Justice of the European Union (Joined Cases C-293/17 and C-294/17) (known as the Dutch Case)

<http://curia.europa.eu/juris/liste.jsf?num=C-293/17&language=en>

¹⁰ Current Development in the River Lugg Catchment

https://www.herefordshire.gov.uk/downloads/download/2039/development_in_the_river_lugg_catchment

phosphates into the River Lugg. Only where development proposals are able to meet a number of criteria which provide certainty that the development will not increase the level of phosphate within the River can such developments be permitted at this time. This has resulted in a significant number of planning applications being undetermined and others where conditions applied to planning permissions are not able to be discharged until the issue is resolved.

- 3.4 To address the issue, the River Wye Nutrient Management Plan¹¹ (NMP) is being updated with a series of actions to address the phosphate issue. The NMP is a partnership project developed to reduce phosphate levels in the Wye catchment, including the River Lugg, to below the target level by 2027 in line with the Water Framework Directive. The NMP is managed by the Nutrient Management Board (NMB), which includes amongst its members Herefordshire Council, Powys Council, Natural England, Natural Resources Wales, the Environment Agency, Dwr Cymru Welsh Water, the Wye and Usk Foundation, National Farmers' Union and the County Land and Business Association.
- 3.5 It is intended that the range of new actions being advanced through the NMP will look to provide sufficient certainty to demonstrate that new residential development will be nutrient neutral or will provide betterment. The revised set of actions being developed by the NMB can be viewed below¹².
- 3.6 As part of this work, the council are actively looking to develop solutions with plans for the creation of a series of integrated wetlands in the Lugg catchment area. A *Memorandum of Understanding* entitled 'River Wye Special Area of Conservation, Phosphate Neutral Development¹³ - Interim Measures' is being developed with key partners, including to reach agreement on the steps to be taken. The council is also preparing to commission an 'Interim Plan' which will demonstrate how the council will proceed with the design, planning applications, land acquisition and development of Integrated wetlands to ensure new development can be demonstrated to be phosphate neutral or provide betterment, therefore allowing development to come forward.
- 3.7 These wetlands will effectively absorb the phosphates produced from new housing developments by natural processes thereby eliminating additional phosphate pollutants into the river. The installation of the wetlands is expected to provide betterment for all sites in the Lugg catchment rather than being specific to individual sites. The Council has resolved to provide funding for new integrated wetlands¹⁴. This decision sets out a clear and comprehensive framework for their provision by addressing funding, legal, land acquisition and operational aspects. The report

¹¹ NMP <https://www.gov.uk/government/publications/nutrient-management-plan-river-wye>

¹² NMP Board July 2020 Additional Actions Added
https://www.herefordshire.gov.uk/downloads/download/102/nutrient_management_plan

¹³ The MoU is made between the following parties: Environment Agency (EA), Natural England (NE), Herefordshire Council (HC) and Welsh Water (WW)

¹⁴ Integrated Wetlands key decision 10th August 2020
<https://councillors.herefordshire.gov.uk/mgIssueHistoryHome.aspx?Id=50033896&Opt=0>

indicates that scientific certainty does not necessarily require any wetlands to be operational, but rather to be sufficiently advanced. It is recognised by the Nutrient Management Board that the construction of wetlands is an interim measure. A series of longer term measures are also being progressed.

- 3.8 The council has committed some £2 million in funding from the New Homes Bonus for the project. In addition a bid for £1 million funding from the Local Economic Partnership has been made, although this has yet to be confirmed. In addition the Council understand that there are private sector proposals for the development of integrated wetlands which are also being developed to enable the release of housing development.
- 3.9 It is anticipated that these actions will provide sufficient certainty to allow new housing developments in the Lugg catchment to be permitted early in 2021. However, in recognition of the complexity of this issue and potential difficulties in demonstrating the level of certainty required, the five year supply calculation in this paper has assumed a longer two year delay should be applied to impacted developments. Therefore, appropriate discounting has been applied on impacted sites identified in Appendix 2. This is addressed further on in the section on discounting in section 4 of this report.

2020 Approach to site survey work during the Covid 19 restrictions

- 3.10 There was an unprecedented national lockdown from 23rd March 2020 when the UK and many other countries across the world placed heavy restrictions on the movements of people due to the Covid 19 pandemic. This included the closure of businesses, retail, leisure outlets and schools for varying lengths of time dependant on activity. This led to limited rights to travel only for essential journeys by key workers. Therefore the usual approach to on site surveying by planning officers was required to be revised. A predominately desktop approach was used and information was gathered in the following ways to determine progress on sites with planning permission.
- Assessing building control records (commencements & completion records) to determine what stage a development had reached.
 - In house council mapping of new dwellings on sites with permission
 - Local estate agent/surveyors websites for information on sites
 - Local knowledge of areas and sites
 - Contacting agents and house builders for latest information with some being furloughed during that time period.
 - Search of applications for discharge of conditions depending on the type of condition could help to show stage of progress.
 - Checking with Development Management colleagues to determine local and working knowledge of sites.
 - Depending on the date of planning permission and conditions at the time (from February 2020 until May 2020), there was a judgement on the likelihood of a site commencing based on the locations of severe flooding in many parts

of the county during February 2020 and with the lockdown following soon after at the end of March. February – May 2020 was a difficult time for construction across the county due to these issues.

- It was only towards the middle of June when officers were eventually able to carry out site visits. A check was made on any sites under construction from last year where there was no desk base evidence that this sites had been completed. This was to establish whether they had been completed during the survey year. This was a useful exercise as many of the sites were in fact completed and not still under construction.

Covid 19 and its effect on the construction industry in Herefordshire

- 3.11 In the main, the construction industry was out of action, from 23 March until 11 May 2020 for a seven-week period. This had varying effects on the industry. Like many businesses, risk assessments were required to be put in place which would have temporarily delayed work on sites due to rearrangements for workers. Building materials were low in stock due to the cessation of work of many suppliers as only essential businesses were operating. Due to new health and safety measures, sites are required to have limits on the number of trades working within each house which may have slowed down operations. However, based on communication with house builders and developers they have been adapting reasonably well as rates are expected to continue as planned. Therefore on the whole, the temporary lockdown will have a minimal impact on the 5 year supply so no allowances have been made as a result of this.

4.0 Calculating the Housing Land position

Core Strategy housing target and trajectory

- 4.1 The NPPF states that strategic policies should be informed by a local housing needs assessment conducted using the standard method in national planning guidance (paragraph 60). As the Herefordshire Core Strategy was adopted nearly four years ago its housing targets are still considered to be up to date. The Core Strategy covers the period 2011-31 and provides for a minimum **16,500 homes** between 2011 and 2031.
- 4.2 This report therefore provides an assessment of the housing land supply against the Core Strategy targets. Policies SS2 and SS3 of the Core Strategy set out the Council's strategy to secure the delivery of a minimum of 16,500 homes in Herefordshire between 2011 and 2031. In respect of a housing target for Herefordshire the expectation is that the highest rate of housing completions will be towards the latter end of the plan period.
- 4.3 The Core Strategy indicative trajectory suggests that in the early years of the plan anticipated delivery rates will be lower but as the housing market improves and key infrastructure is provided, delivery rates will increase. The anticipated Core Strategy trajectory from 2011–2031 is set out in Figure 1. The stepped target is a basis for monitoring and assessing land supply (including the five year housing land supply)

throughout the plan period and a detailed annualised trajectory is provided in Appendix 5).

Figure 1. Overall Core Strategy housing trajectory

	2011-16	2016-21	2021-26	2026-31	Average per annum
Core Strategy	600	850	900	950	825
Totals	3000	4250	4500	4750	16500

Definition of a dwelling

4.4 For the purposes of this exercise it is necessary to define what a dwelling is for it to be included in the supply count. [The Town and Country Planning \(Fees for Applications, Deemed Applications, Requests and Site Visits\) \(England\) Regulations 2012](#) defines it as follows - "a building which is used as a single private dwelling house and for no other purpose" where 'building' is interpreted as per the [Town and Country Planning Act 1990](#). The Planning Portal's definition is helpful in setting it out: A dwelling is a self-contained building or part of a building used as residential accommodation, and usually housing a single household.

4.5 For the purposes of this position statement a dwelling is a:

- house
- bungalow
- flat/apartment
- maisonette
- converted farm building
- replacement dwelling
- permanent house situated in the open countryside with an agricultural tie by means of a planning condition or obligation.
- separate annex/granny annex which can be clearly used as a separate unit (own main door, no shared facilities, no restrictive planning conditions)
- house in multiple occupation for up to 6 persons (one dwelling)
- park home as part of a site of similar homes, or individual residential caravans for permanent use all year round by residents

4.6 It does not include:

- dwellings with conditional restrictions on occupancy during the year or in connection with temporary employment
- temporary static caravans/mobile homes annexes with access via the main house or shared facilities.

- student accommodation, care home accommodation or communal accommodation as this does not form part of the original Core Strategy housing requirement and therefore cannot be said to be meeting its target¹⁵.
- holiday homes

5.0 Methodology and components of the supply

5.1 In assessing the components of the 5-year housing supply position in Herefordshire the contents of the NPPF and NPPG have been considered.

In assessing the 5-year supply position the following elements have been considered:

1. Sites with planning permissions include sites with full planning permission, sites with outline permission, hybrid¹⁶ applications and sites currently under construction as at 1 April 2020.
2. Sites which have received a resolution to grant planning permission between 31 March 2019 and 1 April 2020. There are also some sites with awaiting completion of Section 106 agreements from previous years which have been included in the assessment
3. Sites with prior approval for permitted development rights which would create a dwelling, Certificate of Lawful Existing Use or Development (CLEUD) since the start of the plan period and sites with permission in principle,
4. The contribution that Core Strategy strategic housing proposals can make to the five year supply.
5. A windfall site allowance. The Council has made no allowance for windfalls in the first three years in order to avoid double counting with existing commitments. As such there would be a windfall calculation for years 4 & 5.
6. An assessment of the realistic number of dwellings which are likely to be delivered through neighbourhood development plans over the five year period.

Other factors are also considered against the calculation of five year supply and these relate to:

7. Past housing completions at the time of calculation.
8. The shortfall against plan targets during the same period. Comparisons are made against the indicative trajectory.
9. It is acknowledged that Herefordshire should be considered as a 20% authority as there has been an under-provision in the previous three years which has been less than 85% delivery on completion rates as per NPPF Footnote 39.

The section below explains how each of these factors has been taken into account.

¹⁵ The inclusion of such accommodation in the supply will be reviewed next year as the Core Strategy target will not be in use due to it being replaced by the standard method calculation.

¹⁶ seeks outline planning permission for one part and full planning permission for another part of the same site

Sites with planning permission

- 5.2 Sites with full or reserved matters permission which are considered to be deliverable can contribute to housing supply. The NPPF includes a definition of *deliverable*. It confirms that sites with detailed planning permission or sites which are not a major housing development (less than 10 dwellings) should be included unless there is clear evidence to indicate they will not be developed. In this report sites have been assessed to determine if any are experiencing delays. Where problems have been identified discounts have been applied.
- 5.3 Sites with outline permission which are considered to be deliverable can still contribute to housing supply. However, the NPPF requires more evidence to demonstrate that the site is expected to be delivered in order to be included in the supply. This is particularly the case on sites accommodating 10 or more dwellings. The standard lead in times allows an additional period for such sites to obtain full planning permission and discharge conditions as required. An assessment of all sites in this category has been carried out and discounting has been applied where inactivity exists. Communications with development management officers, agents, house builders and developers have been undertaken to establish a picture of the progress being made. Sites which have been shown to be progressing through activities such as: land sales; reserved matters applications; discharge/variation of conditions; and housebuilder involvement are considered to be making progress through the system. Where there has been inactivity or site progress has not been made then a partial or complete discount of the site has been applied.
- 5.4 Sites which were due to expire between 23 - 31 March 2020 have the ability to have an extension of time by the Government¹⁷ through the Business and Planning Act (20 July 2020) therefore the expiry dates on these sites were amended and taken into account within the figures as it has been assumed that they may apply for an extension. There were just two sites in total both in Hereford.
- 5.5 Sites that are under construction are considered to be deliverable and such sites continue to deliver completions. Such sites are making steady progress and evidence suggests that they will continue to do so.

Additional supply contributions from other types of permissions

- 5.6 Included in the commitments, is a certificate of lawfulness (CLEUD) decision P142613/U at Lea Villa, Lea. This was a historic permission dating back to 1969 for use of land for the siting of 52 caravans for residential purposes and occupied by persons of 50 years of age and over. The CLEUD is allowing the intensification of the site. The actual number of additional park homes is not set out in the application but

¹⁷ Gov.UK Press Release https://www.gov.uk/government/news/new-plans-to-get-britain-building-in-coronavirus-recovery?utm_source=54854b02-b444-40b8-9639-2530955c296c&utm_medium=email&utm_campaign=govuk-notifications&utm_content=immediate

after investigation, the plan is for an additional 18 more homes. 13 park homes have been sited and completed in 2018 whilst another 5 have not yet started.

- 5.7 Similarly, a planning decision for a CLEUD (160813) on Yew Tree Residential Park, Peterstow allows for additional siting of mobile homes. The CLEUD is not specific about the number of mobile homes but it is estimated that the site has capacity for a minimum of 10 homes. 2 of these homes have been completed in 2020 with 6 not started.
- 5.8 Permission in Principle (PIP) is an alternative way of obtaining planning consent for housing led development. It separates the consideration of the principle of planning permission from the technical detail of the permission, and so is split into two stages. There is one such permission in the supply located at Richards Castle 191749/TD5. The principle of development on the site has already been established, not only through the grant of Permission in Principle, but also given that the site is allocated for housing in the NDP. The Technical Details Consent (TDC) for the housing element of the scheme was been approved January 2020.
- 5.9 Certain types of development are granted planning permission by national legislation without the need to submit a planning application. This is known as 'Permitted Development'. In order to be eligible for these permitted development rights, each 'Class' specified in the legislation has associated limitations and conditions that proposals must comply with.
- 5.10 One such condition on certain classes of permitted development is the need to submit an application to the Local Planning Authority to determine if its 'Prior Approval' will be required. This allows the Local Planning Authority to consider the proposals, their likely impacts in regard to certain factors (e.g. transport and highways) and how these may be mitigated. Generally in this county they tend to be Class Q type developments which is the conversion of an agricultural building to a dwelling house. There are a small number of these permission types within the commitment list for example P192257/PA4. Notably, under Class Q (a) & Class Q (b) if any, must be completed within a period of 3 years starting with the date of the permission. Appendix 1 lists all commitment sites with planning permission at 1 April 2020.

Figure 2a. Commitments (before discount)

Commitments	2019/20
Not started	4668
Under construction	692
Total (Gross)	5360
Total (net)	5166

Commitment sites discounts and considerations

- 5.11 In line with the requirements of the NPPF and PPG a more detailed assessment of sites has taken place. Some of the larger sites may still have further applications, land assembly and purchases to complete before commencement on site can begin

therefore their ability to contribute fully to the supply has been considered and discounts and adjustments have been applied where necessary. All outline permissions capable of accommodating 10 or more dwellings have been assessed to determine their deliverability. A combination of contact with the Council's Development Management team as well as agents, and the house builders associated with the sites has been used to determine how much these sites will contribute to the supply.

5.12 The **phosphates** issue in the catchment of the River Lugg is summarised elsewhere in this report and is acknowledged to have implications for a number of impacted sites. All sites with permission in the Lugg catchment¹⁸ have been assessed to consider whether they should be included as part of the five year supply. Sites which are due to expire beyond two years from July 2020 are included, (subject to other constraints). This is based on available knowledge at the time of drafting in July 2020 as the phosphate issue is expected to be resolved by then, see section 2 of this report.

- Sites with outline permission expiring within two years (by July 2020) have had appropriate discounts applied, as the phosphate issue is not expected to be resolved to allow them to come forward before then.
- All sites with full permission (including those with capacity for 10 or less) approved with pre-commencement conditions, pertaining to acceptable drainage plan requirements have also been discounted if they expire in the next two years. A list of these discounted sites can be found in Appendix 2.

5.13 Where sites with full planning permission are known to have some other factors causing delays to delivery they have also been discounted in part or full where necessary. Full details of the discounted sites can be seen in Appendix 2 including the reasons for discounting and retention of sites as part of the supply are also set out. Discounting has been considered and applied to certain sites with:

- full planning permission
- full planning permission on sites situated in the Lugg catchment with Phosphate issues
- outline planning permission
- and sites with a resolution to grant planning permission, see para 4.11 below.

Sites with a resolution to grant planning permission

5.14 All sites which have been to planning committee and have achieved a resolution to grant permission between 31 March 2019 and 1 April 2020 have been considered as part of the supply. There are also sites from previous years which are still awaiting a section 106 sign off which are also assessed for their potential to contribute to the five year supply. They too have been assessed and discounted where necessary. As these sites currently have no expiry date but due to their location in the Lugg catchment, the sign off of the Section 106 legal agreement is preventing further

¹⁸ Map of River (Special Area of Conservation) Lugg catchment
https://www.herefordshire.gov.uk/download/downloads/id/20536/map_showing_river_wye_and_river_lugg_sac_catchment_area_in_herefordshire.pdf

progress. However, they still have potential to come forward beyond the two year expected timeframe subject to a solution to the phosphate issue being achieved. All of these sites are also set out in Appendix 2.

Figure 2b indicates the commitments once all of the above discounts have been applied.

Figure 2b Commitment figures (post discounting)

A total of **4427** is the final commitment figure that will contribute to the supply.

Commitments (net)	2019/20	Discounted	Sub Total
Total commitments (net)	5166		
Dwellings on Resolution to grant permission sites	101		
Commitments and resolution to grant permission sites	5267		5267
Discounted full permissions		305	
Discounted full permissions (sites with capacity <10 units) Lugg catchment		56	
Discounted outline permissions		429	
Discounted resolution to grant permission sites		50	
Total discounted			840
All commitment sites after discounting			4427

Strategic urban extensions

- 5.15 The Core Strategy strategic housing proposals have the potential to make a significant contribution to the overall housing land supply over the plan period. They were vigorously examined as part of the Core Strategy examination in public. Detailed discussions with developers, agents and landowners have been progressing on a regular and productive basis and as outlined in the following sections.
- 5.16 Projected out-turns on these sites have been assumed at levels currently advised by the in house planning officers to establish lead in times for each decision milestone. This has also been balanced against the views of the relevant applicants or agents associated with each site. Estimations on commencement and build out rates have been advised by the development industry during June/July 2020. Figure 4 sets out the projected annual build rate for each of the strategic sites. However, given the size of these sites and the potential for more than one house-builder to be active on site at any one time, there is potential for a significant increase in the levels of delivery should there be a further increase in market demand for housing in the area. The

delivery of strategic site allocations will be a key focus as these will make a substantial contribution to housing delivery in the longer-term.

- 5.17 Two of the urban extension sites within the Core Strategy now have planning permission following two separate Planning Committee meetings. Holmer West (150478) in Hereford achieved a planning permission for 460 dwellings in August 2016 with a section 106 agreement signed 19 May 2017. Phase 1 for 88 dwellings is complete and the Phase 2 application (182712) for 221 dwellings is well underway. The site is making good progress and has been accounted for in the commitments at Appendix 1.
- 5.18 In March 2018, land at Hildersley in Ross on Wye (150930) achieved outline planning permission for 212 dwellings and is currently for sale. There is housebuilder interest in the site. Due to the land not having a reserved matters permission a cautious approach has been taken as to its potential delivery and this is accounted for in the discounted sites at Appendix 2.

Hereford western urban expansion, Three Elms

- 5.19 Three Elms is principally in the ownership of the Church Commissioners who provide active support for the development proposed. An outline planning application (162920) was validated in September 2016. Smaller areas of land to the south of the expansion area are covered by options to Taylor Wimpey. Development at Three Elms is subject to planning policy requirements for a range of social, transport and environmental infrastructure. The range and scale of matters to be addressed is generally typical for a scheme of this nature. Flood risk considerations are addressed in the policy.
- 5.20 Policy HD5 as currently drafted requires the development to make contributions to Hereford transportation improvements (infrastructure and sustainable transport measures), and to deliver land and infrastructure to facilitate the construction of the adjoining phase of the Hereford Bypass. The Council is currently undertaking a review¹⁹ of both the South Wye Transport Package and the Hereford Transport Package (HTP), which includes the bypass. As a result, work and studies on the new road infrastructure has paused. Therefore, the applicant of any proposal for the Western Urban Expansion (Three Elms) will need to demonstrate that their development would not cause unacceptable impacts upon the existing road network. Transport modelling is underway to investigate network capabilities with the additional housing.
- 5.21 Due to concerns raised by neighbouring food and drink industries regarding the impact of the development upon their water supply, further investigations were required. These are now complete and are being reviewed by the Environment Agency and Natural England. The council is awaiting the results of this work and a review of the masterplan to take into account drainage and landscape may be

¹⁹ Hereford Transport Package & South Wye Transport Package
<http://councillors.herefordshire.gov.uk/ieDecisionDetails.aspx?ID=6200>

required. In light of the above changes, revised plans for the Three Elms site are being prepared and are expected to be resubmitted in the near future.

- 5.22 As a result of these additional investigations commencement on the site is not expected until October 2022 with delivery of 35 dwellings in year 4 (2023/24) and 75 dwellings in year 5 (2024/25) giving a total of 110 dwellings in the five year period.

Hereford southern expansion, Lower Bullingham

- 5.23 Lower Bullingham is controlled by a single developer (Bloor Homes). Significant technical work undertaken by the developer has been discussed with the Council and other stakeholders. A hybrid application (194402) was submitted in December 2019. This is an outline application for the whole site but phase 1 of the development is identified in the same level of detail as a full or reserved matters application. This will allow commencement on site with phase 1 whilst remaining phases are agreed. This is to expedite the process of delivery on such a large site. It will also allow the developers to respond to the market with regard to house types in later phases.
- 5.24 The developer anticipates a comprehensive scheme coming forward for planning approval for 1,300 dwellings and other uses in line with the Core Strategy policy HD6. The principal site access will be onto the B4399 (Rotherwas Access Road).
- 5.25 The development of Lower Bullingham is subject to planning policy requirements for social, transport and environmental infrastructure. The range and scale of matters to be addressed is generally typical for a scheme of this nature. Flood risk considerations are addressed in the policy.
- 5.26 Policy HD6 requires the development to make contributions to Hereford transportation improvements (infrastructure and sustainable transport measures). However, as set out above regarding the strategic site at Three Elms, the pause and review decision affects this site in a similar way. The outcome of the pause & review has yet to be set out in terms of how it will affect the site coming forward as a whole for it to be compliant with policy HD6. However, as this site already has a housebuilder on board it is expected to have less delay in delivering the site once a decision has been made. The site is expected to commence delivery of phase 1 in 2022/23, with 40 dwellings programmed to be completed in the initial year following site preparation and continuing with 50 dwellings per annum thereafter, yielding a total 140 dwellings in the five year period.

Hereford, City Centre development

- 5.27 The Core Strategy identifies the city centre as providing 800 houses over the plan period. This area is not an SUE as such but more of a strategic policy priority to be delivered as part of a co-ordinated redevelopment with the majority of those new houses to be delivered within the urban village, a policy area; formed by a conglomeration of underutilised sites located to the north of the river bounded by the railway line to the north. The remainder is comprised of individual planning

permissions across the policy area. The policy area of HD2 is situated in the centre of Hereford, see Appendix 7 for map of the area covered by HD2.

- 5.28 The new Link Road traverses across Merton Meadow from Commercial Road to Edgar Street and opens up previously land locked sites for development. Other than the Link Road, which is complete, delivery of housing in the city centre is not dependent on the delivery of any other strategic infrastructure, and applications for housing schemes are regularly coming forward. Welsh Water are fully engaged in discussions on the improvements required to the water and sewerage infrastructure. Contributions towards additional educational needs would be expected to come forward as part of this development.
- 5.29 The completion rate to date in this area is 372 dwellings²⁰ since 2011. This completion figure set against the target for delivery of 800 dwellings shows that approximately, a further 430 dwellings should be delivered to meet the Core Strategy growth targets for this area. In addition, commitments within this area amount to 188 dwellings yet to come forward. Based on recent year's performance, the build out has been revised down as it is more reflective of delivery rates in the area over the past nine years. Therefore a rate 40 dwellings per annum for years 4 and 5 is forecast to avoid double counting with current permissions. This is also the anticipated rate without any duplication with the windfall allowance. The council is working alongside its strategic partners, to deliver redevelopment of the land it owns in and around the city centre, particularly within the area close to the link road known as Station Approach. Three sites have been identified with capacity for 140 units as well as units for the assisted living. Flood mitigation work is required to release this land. Homes England will be supporting the council and its partners with increased financial help to include infrastructure grants and this will include the Registered Providers. There will be joint development agreements on strategic land purchases as well as capacity support for the council. Figure 3 below outlines the current rate of commitment and completions for this area. Appendix 1 contains a list of all the HD2 commitments and Appendix 4 for the completions in this area of Hereford.

Figure 3. HD2 City Centre progress

City Centre HD2	Completions (net)	Commitments (net)
2011-2019	239	188
2020	133	
Total to date	372	

²⁰ The completion and commitment figure has already been incorporated into figures above to avoid double counting.

Bromyard, Hardwick Bank

- 5.30 The Core Strategy strategic urban extension site in the town is in the controlling interest of Bovis Homes. A planning application (163932) was submitted in April 2017 for up to 500 homes which is 250 dwellings more than the urban extension identified in the Core Strategy.
- 5.31 Contributions towards additional educational needs, a new park, or any other identified infrastructure requirements will be provided for as part of any planning permission and associated s.106 agreement. Discussions with Welsh Water are ongoing to identify a suitable potable water source and additional infrastructure may be needed to deliver this. These discussions are at an early stage in identifying deliverable solutions. Active transport links and improvements to footways, cycleways, crossing facilities and bus stops will be provided as part of the Hardwick Bank development.
- 5.32 The site is currently being considered by the District Valuer to determine any viability issues. The site is also affected by the phosphates issue as it is located in the River Lugg hydrological catchment and this will cause a delay to bringing the site forward. Although the phosphate issue prevents the site coming forward in the short term. The matters relating to water supply and waste water pose potential longer delays as there is a need for infrastructure according to Welsh Water. How this is addressed has yet to be set out. Therefore in this year's supply the contribution from Hardwick Bank is 0 due to lack of evidence.

Ledbury, Viaduct Site

- 5.33 A planning application (171532) for up to 625 homes was submitted in April 2017 together with an Environmental Statement. The application was refused by Planning Committee 11 December 2019 on highways access and conservation grounds. An appeal was lodged and commenced by virtual inquiry on 13th July 2020 but the inquiry did not finish as planned and will be resuming on 22 September 2020. Herefordshire Council withdrew its reasons for refusal shortly after the planning committee decision was made and therefore provided only summary information relating to the 5 year housing land supply going forward into the inquiry. Ledbury Town Council provided evidence as a Rule 6 party. The application has also been called in by the Secretary of State who will review the Planning Inspector's report.
- 5.34 An allowance for the canal forms part of the strategic site. The intention is for this land to be transferred to the Canal Trust as part of a future planning permission. The Section 106 agreement is in drafts heads of terms. According to the applicant who is a housebuilder, pending on the outcome of the decision, if the appeal is allowed by the Secretary of State, then development could commence on site in October 2021 with delivery in year 3 of 36 dwellings and 50 dwellings in each year 4 and 5. The site is expected to yield a total 136 dwellings in the five-year period. If the appeal is dismissed and a new application is required there could be a further delay of one year in bringing this site forward which would reduce the yield on the site to 86 dwellings for the five-year period.

Leominster Southern Expansion

5.35 Policy LO2 sets out a number of planning policy requirements for a range of social, transport and environmental infrastructure. A critical element of this is the provision of a link road from east to west at the southern limit of the urban extension to serve the new development. The likeliest section of the site to provide for early release of land would be on the eastern side of the site on Hereford Road. The Council is currently looking at a timetable to bring the site and the road forward. However due to the site's progress to date it is not expected to deliver in the short term and is more likely to be in the medium term future.

Figure 4. Strategic Urban Extension Sites build out rate at April 2020

Strategic location	Estimated Core Strategy site capacity	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	Sub total
Hereford							
Hereford, Three Elms	1000				35	75	110
Hereford, Lower Bullingham	1000			40	50	50	140
Hereford, City Centre Urban Village	800 (-372)				40	40	80
	Remainder to be delivered = 428						
Leominster							
Leominster, Southern expansion	1500	0	0	0	0	0	0
Bromyard							
Bromyard, Hardwick Bank	250	0	0	0	0	0	0
Ledbury							
Ledbury, Viaduct ²¹	625			36	50	50	136
Total	4803		0	76	175	215	466

²¹ Note: This Strategic site has been subject to a recent refusal of planning permission which is currently the subject of an appeal. The yield suggested in the table is based on discussions with the developer and should the appeal be dismissed the build out rates in the table would be at risk as a further planning application would need to be submitted.

Windfall assessment

- 5.36 Windfall sites are those that have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available. Herefordshire is a predominantly rural county and experiences a number of windfalls that also come forward on greenfield land. The Revised NPPF states at paragraph 70, 'Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends'. In her report regarding the soundness of the Core Strategy the Inspector indicated in paragraph 50 that the Core Strategy's windfall allowance *"is justified by figures from past monitoring reports showing a consistent level of windfalls throughout the county over many years."*
- 5.37 The SHLAA is an assessment of the likely total numbers of new houses that could be achieved on sites with potential to deliver 5 or more dwellings. Historically, larger windfall sites have not formed a major part of the housing supply. Therefore it was decided to continue to focus this assessment on the smaller windfall sites as they have a stronger pattern of occurrence. The historic performance of windfall sites accommodating four or less dwellings was assessed as these sites would not be identified through SHLAA. Historic windfall completions are detailed in the table below.
- 5.38 The evidence in Figure 5 however indicates that on average 197 dwellings come forward per annum on sites with capacity for 4 or less dwellings. While the NPPF does not support the inclusion of garden land as windfall development, the Council believes there is clear evidence and policy support that supply from this source will continue and it is suggested there is additional flexibility for these sites to come forward. In Neighbourhood Development plans without specific site allocations, there are 28 which contain settlement boundaries and criteria based policies to allow for continuing growth within the settlement for these windfall developments.

Figure 5. Historic windfall completion rates

YEAR	Net Windfall Completions (all sites)	Net Windfall²² (site capacity 4 or less)
2004/05	454	297
2005/06	610	278
2006/07	552	243
2007/08	559	263
2008/09	449	191
2009/10	342	176
2010/11	267	158
2011/12	233	89
2012/13	137	57
2013/14	281	95
2014/15	647	303
2015/16	253	122
2016/17	347	128
2017/18	707	319
2018/19	583	238
2019/20	641	188
TOTAL	7062	3145

5.39 Windfall sites accommodating four or less dwellings provide about 40% of the total housing completions over the past ten years. The Council therefore considers it realistic and reasonable to expect 100 windfall units will be delivered per year over the next 5 years (in line with the windfall estimate set out in the Core Strategy). Based on past trends and the number of windfall sites that are currently either undetermined applications or at an advanced stage of preparation, this is considered to be a conservative estimate of what is likely to be delivered.

5.40 To avoid double counting, the Council has applied the windfall allowance within the housing trajectory from year 4 onwards only (2023/24 and 2024/25) to recognise the contribution small sites make to the housing land supply. This is because planning permissions lasts for 3 years and some of the existing housing commitments will already be windfall developments. As past windfall rates have been steady and more than reflect the current allowance there may be a potential review of the windfall rate next year.

²² These completions exclude residential garden land completions

Figure 6. Anticipated windfall

Windfall allowance for yrs. 4 & 5 is 100 dwellings pa	100	
Account for yrs. 4 & 5 in five year supply		200

Sites brought forward through Neighbourhood Development Plans

- 5.41 The Council has been proactive in working with local communities on the preparation of Neighbourhood Development Plans. There are currently 111 Neighbourhood Development Plans (NDPs) being prepared which covers all the market towns except Bromyard and over 87% of those rural settlements highlighted for growth. It is expected that they will take between 12 and 18 months to reach adoption. Once adopted, these NDPs will add local detail to the policies set within the Core Strategy, as required by national planning policy set within the NPPF, as well as playing a major part in the delivery of the level of housing required in the plan period. Paragraph 40 of the NPPG is clear that Neighbourhood plans should deliver against the *up to date evidence of housing needs*.
- 5.42 Housing delivery in the rural areas has historically been strong and has provided approximately half of development in the County. Housing allocations within rural areas are contained within neighbourhood development plans. As at 28 July 2020 there are 72 adopted/made NDPs and 6 further plans awaiting referendum. A further 8 plans have reached examination stage and 1 plan have reached submission (regulation 16). In addition a further 4 plans have reached draft plan stage (regulation 14). Therefore a total of 91 NDPs have material weight in planning decisions. 48 of these plans contain site allocations.
- 5.43 This estimate takes account of the progress made to date. Those more advanced NDPs include proposals for approximately 1538 dwellings which equates to 434 dwellings excluding those identified sites with planning permission. This includes Plans that are at Regulation 14, Regulation 16 post examination, those with scheduled referendums and those that are due to be Made or have been Made. The following build out rate anticipated for NDPs is based on the yield of allocations set out in current NDPs that have been adopted/made. This amounts to a 337 dwelling yield from all these allocations, see Appendix 3 for a list of these sites.
- 5.44 The parishes have provided confirmation of these sites coming forward through their knowledge of the sites and landowners. An analysis of planning interest on certain sites has also been included in the estimate. Due the early stages these sites are at in the planning process, they are not expected to come forward before two years and this is considered a reasonable approach with the phosphate issue. The estimate below is considered to be cautious as it only amounts to a fraction of the total allocations there are in the NDPs. Where issues have been identified with sites,

discounting has also been carried out and this is reflective of the discounting carried out earlier with the commitment sites.

Figure 7. Anticipated Neighbourhood Development Plan supply

	Year 1	Year 2	Year 3	Year 4	Year 5	Total
NDP allowance for yr2 - yr5			112	112	113	
Total						337

5.45 The table below sets out all the aforementioned deliverable sites with a sum total of **5430** deliverable dwellings.

Figure 8. Total deliverable sites

Deliverable (net)	Amount	Discount	Total
Total commitments	5166		
Total dwellings on Resolution to grant permission sites (net) discounted	101		
Total before discount	5267		
Commitments discount (full pp) large sites		305	
Commitments discount (full pp) small sites		56	
Commitments discount (outline permission)		429	
Resolution to grant permission sites discount		50	
Discount total		840	
Commitments post discount	4427		4427
Strategic Urban Extensions			466
Neighbourhood Plans allocations (without planning permission)	337		337
Windfall allowance for yrs. 4 & 5 in five year supply			200
Total deliverable sites			5430

Additional calculation factors

Past housing completions

- 5.46 Completions are monitored annually and are deducted from the overall target to establish progress. See Appendix 4 for a list of completions.

Figure 9. Completions compared with Core Strategy indicative trajectory

Year	Core Strategy year	Net requirements with stepped trajectory	Net Completions	Shortfall Difference
1	2011/2012	600	341	-259
2	2012/2013	600	201	-399
3	2013/2014	600	331	-269
4	2014/2015	600	774	174
5	2015/2016	600	327	-273
6	2016/2017	850	405	-445
7	2017/2018	850	776	-74
8	2018/2019	850	666	-184
9	2019/2020	850	904	54
	Total	6400	4725	-1675

Shortfall of housing supply from previous years

- 5.47 The shortfall is calculated from the start of the Plan period to the time of calculation (2011- 2020). The shortfall itself comprises the difference between the number of homes that should have been built in trajectory terms and those that have actually been built over this period. The Council's shortfall is 1675 when assessed against the indicative Core Strategy target as set out earlier in Figure 1.

Buffers

- 5.48 As set out earlier at para 2.1 the NPPF states that supply should include a buffer. Due to not having a 5 year housing land supply for the past three years and to improve the prospect of achieving the planned supply the council continues to apply the 20% buffer rather than the 5% or 10 % buffer to the housing requirement. The buffer is added after the shortfall in the calculation.
- 5.49 Taking into account all the variables set out above, Figure 10 provides a summary of how the five year supply is calculated. The table shows that with a stepped trajectory target and the shortfall being addressed over the forthcoming five years there is currently not a five year supply of housing land in the County.

5.50 2020 Five year supply result

Figure 10. Assessment against Core Strategy stepped trajectory

	Source	Homes	Notes
A	Core Strategy	16500	
	2011 – 2031		
B	Core Strategy requirement	6400	Using Trajectories: 600 dpa 2011-2016 (5yrs.) 850 dpa 2016-20120 (4 yrs.)
	1/4/2011 – 1/4/2020		
C	Homes Completed (net)	4725	Net reduction includes demolitions and conversions
	1/4/2011 – 31/3/2020 (past nine years)		
D	Requirement for next five years	4450	Using Trajectories 20/21 –21/22 850 pa (1 yrs.) 21/22 – 24/25 900 pa (4 yrs.)
E	Plus Residual Shortfall	1675	(over next five years as per NPPG)
F	Plus 20% buffer	1225	As recommended by Core Strategy Inspector and NPPF 2018
G	Total Requirement	7350	
H	<i>Annualised requirement</i>	1470	
I	Total Deliverable dwellings	5430	
J	Housing Supply	3.69 years	I / H

6.0 2020 Housing land supply for Herefordshire

- 6.1 When assessed against the Core Strategy, the current supply is **3.69 years**. Before any discounting of sites was carried out this year's permissions were just over 200 dwellings less than in 2019. Changes to the NPPF over the past two years has meant there is a requirement to be more rigorous with sites in terms of what is considered to be deliverable. Sites with permissions and allocations have been discounted where there is inactivity or lack of information on them coming forward through the planning process or being developed.
- 6.2 This year the progress of planning applications has been effected by the phosphate issue in the north of the county within the Lugg catchment. This is impacting on sites with planning permission as they cannot proceed until the issue is resolved. A total of 840 dwellings have been discounted from the housing supply for following detailed assessment, primarily due to the phosphate issue in the Lugg catchment.
- 6.3 There are sites within the Lugg catchment which have not been discounted as they are at the very early stages of planning. This includes some NDP Allocations where delivery is expected later in the five year period. The strategic site at Bromyard has also been impacted by the issue delaying delivery. The windfall allowance has also been reduced to acknowledge the impacts of the phosphate issue.
- 6.4 The pause and review decision on the Hereford Transport Packages may have implications on the progress of two strategic sites in Hereford at Three Elms and Lower Bullingham. This has resulted in an anticipated lower yield over the five-year period.
- 6.5 Other reasons for the discounting are set out in the appendices but phosphate issue has been a key reasons for the decline in the supply from 2019 where the supply was 4.05yrs to 3.69yrs in 2020.
- 6.6 However, Herefordshire has seen the highest number of completions since the start of the plan period in 2011, this is a clear indication of that the construction industry is very active within the county. This year's completions has helped to reduce the shortfall and will be reflected in the results of the national Housing Delivery Tests due for November and potentially impacting positively upon future five-year housing supply targets.

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



APPLICATION DETAILS

325492 /
Bridstow Parish
Susannah Burrage, Environmental Health Officer

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

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

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

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

Please can you respond by ..

Comments

Our comments are with reference to the potential impact on the amenity – in terms of noise, dust, odours or general nuisance to residential occupants that might arise as a result of any new development and also the impact that existing activities might have on the amenity of any new residential occupiers. Our key concern with regard to this Neighbourhood Plan are the road traffic noise impacts from the A40 and A49 which the plan does not address for future occupants. This is contrary to the Planning Practice Guidance for Noise which specifies that the acoustic environment must be taken into account in the design and layout of the site

Commenting on the overall policies of the plan we made the following recommendations for amendment. These have not been incorporated in the Reg 16 consultation document and are therefore repeated again.

Para 4: Vision and objectives

To accommodate new housing sensitively within and adjacent to the Parish's settlements, ensuring the types and sizes of dwellings meet local needs in particular. This would be by:

Additional paragraph

e) Ensuring that the acoustic environment is taken into account in the design and layout of the houses and site.

BR13 Wilton settlement boundary

Our department objects to the settlement boundary for Wilton which identifies the potential for residential land use abutting the A40 adjacent to the Castle Lodge Hotel. Noise is a significant constraint at this site and it is highly likely that potential residents would have to keep most of their windows closed all of the time to block out road traffic noise. The site would not provide for a good level of amenity for proposed occupants.

Should it be determined that this is the settlement boundary for Wilton we would recommend the following additional criteria:

g) New residential development should not be adversely impacted by road traffic noise.

Map 3: Bridstow Policies Map (Bannuttree)

As stated also in the Regulation 14 response our department also has objections regarding the proposed settlement site at far western end of the Bannutree Map 3 which is right up against the A49. There is a high risk of adverse impacts from road traffic noise at this location with no scope for sufficient noise mitigation.

Should it be determined that this is the settlement boundary for Bridstow Bannuttree we would recommend the following additional criteria:

f) New residential development should not be adversely impacted by road traffic noise.

Signed: Susannah Burrage

Date: 16 February 2021

Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment

From Herefordshire Council Strategic Planning Team

Name of NDP: Bridstow- Regulation 16 submission version

Date: 17/03/21

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
BR1- Sustainable Development	SS1	Y	
BR2- Development Strategy	SS2; RA2	Y	
BR3- Major Development within the Wye Valley AONB	SS6; LD1	Y	This aspect of protection may already be covered by the Wye Valley AONB Management Plan?
BR4- Conserving the Landscape and Scenic Beauty within the Wye Valley AONB	SS6; LD1	Y	
BR5- Protecting Heritage Assets	SS6; LD4	Y	Protection and enhancement of heritage assets and their settings should be applied in a manner that is appropriate to their significance.
BR6- Enhancement of the Natural Environment	SS6; LD2	Y	
BR7- Protection from Flood Risk	SD3	Y	
BR8- Sewerage and Sewage Infrastructure	SD4	Y	
BR9- Sustainable Design	SS7; SD1	Y	
BR10- Housing Design	SS6; LD1	Y	

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
and Appearance			
BR11- Traffic Measures within the Parish	SS4; MT1	Y	
BR12- Highway Design Requirements	SS4; MT1	Y/N	The resistance to the provision of street lighting presents a slight conflict with SD1, which states that new development should create safe and accessible environments, minimising opportunities for crime through the. There is a possibility that developments that come forward may create the need for this where necessary for safety and security reasons.
BR13- Housing Development in Wilton	RA2	Y	
BR14- Housing Development in Bridstow	RA2	Y	
BR15- Housing Sites in Bridstow Village	RA2	Y	*Site i has been submitted in recent call for sites, confirming continued availability/development intention.*
BR16- Housing Development within Buckcastle Hill Area of Special Character	RA2; LD1	Y	
BR17- Agricultural Diversification, Tourism and other Employment Opportunities	RA6; E4	Y	
BR18- Renewable and	SD2	Y	

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
Low Carbon Energy			
BR19- Polytunnel Proposals	N/A	Y	
BR20- Protection and Enhancement of Community Facilities	SC1	Y	
BR21- Protection of Local Green Space and Areas of Open Space	OS1; OS2; OS3	Y	
BR22- Contributions to Community Services, Youth Provision and Recreational Facilities	N/A	Y	
BR23- High Speed Broadband and Telecommunications	N/A	Y	

Latham, James

From: Withers, Simon
Sent: 10 February 2021 07:55
To: Neighbourhood Planning Team
Subject: Bridstow Regulation 16 submission neighbourhood development plan consultation

Hello NDP team

Some thoughts on the R16 document are set out below

- A quick reference guide to the polices and the page number at the front of the document would greatly assist officers in using the policy efficiently
- Just wanted to check that the capacity of the junction next to the school and which would serve the allocation north of the A49 at Bridstow has been checked out with Highways England?

In relation to specific policies:

BR1 (c) - can the PC clarify what is meant by housing that meets "local community need" it doesn't appear to be well defined and in his context would be a very subjective consideration

BR3 – will an Examiner accept a different definition of what constitutes major development given the NPPF defines this?

BR7 – is this adding anything in the context of established policy?

BR8 – again this policy is not really adding anything as WW will object/condition development where capacity is an issue

BR9 (a) – no reference to electric charging points?

BR18 – concerned about a dichotomy in wording of this policy – major development resisted, will only be accepted where it has public benefits AND do not adversely impact upon the AONB. I don't see any circumstances where a major renewables proposal will not have an adverse impact. If there is an acceptance that there is a public benefit would it not be better to say that its impact will be mitigated?

BR19 – by definition I would suspect that large scale polytunnel development will amount to major development so this policy is effectively objecting to the principle of polytunnel development by my reading

I hope these comments are helpful

Herefordshire.gov.uk

Simon Withers

Development Manager | Development Management
Economy and Place

Personal Contact Details:

@ Simon.Withers@herefordshire.gov.uk

Tel 01432 260612

Mail Development Management, Herefordshire Council, Plough Lane Offices, Plough Lane, Hereford, HR4 0LE



Latham, James

From: Victoria Piechowiak
Sent: 01 March 2021 11:14
To: Neighbourhood Planning Team
Subject: Regulation 16 Bridstow NDP

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

From: Victoria Piechowiak

I am writing to lodge my objections to the above Regulation 16 Bridstow NDP.

1. That the NDP has included too many proposed new houses in the Buckcastle Hill area, disproportionate to the rest of the village, and the increased amount would be out of keeping with a village settlement and an ANOB.
2. The proposals for 'gated entrance' to the Cottrells farm site, and the height and size of proposals for houses at Foxdale, are both totally out of keeping with the existing low rise village houses, and would give a 'suburban' look in a rural village.
3. The proposed sites, and the one adjacent to Oaklands cottages are all far from the hub of the village, which is nearer to Wilton where the school, village hall, church, and garage shop are located.
4. Additionally, if these plans were implemented, the amount of extra traffic generated on this already busy narrow road, would be substantially increased.

In conclusion, I feel that the Cotteralls Farm
And the other sites along the Hoarwithy road, at Oaklands Cottages and Foxdale, should be withdrawn from the Bridstow NDP on the grounds that a total of 26 new houses in the Buckcastle Hill area is disproportionate to the rest of the village, out of keeping in an area of ANOB and damaging to existing residents local amenity.

Yours sincerely
Victoria Piechowiak

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Bridstow Neighbourhood Plan.

Stage : Regulation 16

Name : William Wilde

Address:

02/03/2021

Comments and Objections.

Dear Sirs,

I wish to object to the NDP for Bridstow, Reg 16, latest planning proposal concerning land at Cotterell's Farm, Bridstow for a proposed 8 new house development:-

1. The area is designated nationally as an Area of Outstanding Beauty, and therefore any developments can only be proposed under 'exceptional circumstances'. What are these circumstances?
2. The field in question is classified as Grade 2 Agricultural Land and is currently farmed as pasture for livestock. Such land is outlawed for development under the national planning policy guidelines for the ANOB.
3. Planning permission already exists for 8 new large executive houses in the parkland immediately adjacent to this proposed site, literally across the road. 16 houses in one vicinity meets the criteria for description, as a 'housing estate'. The development of housing estates is contrary to National Planning Policy within the ANOB.
4. It is well known that the C1261 road has a highly dangerous width restriction at Rock Cottage, just below its junction with the main A49 trunk road. 16 new houses means an average of a further 25 vehicles using this already busy and dangerous road every day. Such extra traffic will render this road extremely unsafe.
5. The NDP for Bridstow has had to redraw and extend the village settlement boundary in order to accommodate for this proposal. Adjacent properties and landowners have not as yet been informed or contacted by Bridstow NDP for consultation on what will be a very contentious issue.
6. There are no pavements in this part of Bridstow, not even to the junction with the A49 Trunk Road. All journeys from the proposed site would have to be made by vehicle. It is a very long and dangerous way on foot to reach either school or church. Should the provision of pavements be required to meet Planning Regulations for such developments along this road, the area character will change from rural to suburban which is contrary to the wishes of the majority of villagers at a previous public meeting in 2014.
7. This draft proposal greatly increases the housing density in this part of Bridstow (along the C1261 road, Buckcastle area) to significantly change the whole character of the area to suburban from rural. Yet again contrary to national planning policy within the ANOB.

I understand the NDP for Bridstow has already identified sufficient land for development to meet their national housing need quota. Hopefully this letter of objection with its genuinely meaningful concerns and reasons, will add to other pleas to save this beautiful rural environment from being despoiled by developments such as this proposal in particular.

Yours sincerely,

W.E. Wilde