

Aston Ingham Neighbourhood Development Plan

Response to Regulation 16 representations

Introduction

1. The Aston Ingham Neighbourhood Development Plan (NDP) was submitted by Aston Ingham Parish Council (the Qualifying Body, QB) to Herefordshire Council on 26 October 2022. A consultation in accordance with Regulation 16 was carried out by Herefordshire Council from 3 November to 15 December 2022. The NDP progressed to examination on 4 January 2023.
2. The QB has been given the opportunity to respond to representations made at the Regulation 16 stage. The QB wishes to respond to:
 - Representation by Mr. Stallard that land at Ellsmere should not be allocated for development in the NDP.
3. The QB's response to this representation is set out in the schedule overleaf. The opportunity to respond is appreciated. The QB has no comment to make on the other representations.

23rd January 2023

Responses by the QB to representation to the Aston Ingham Neighbourhood Development Plan Regulation 16 consultation

Abbreviations used

HC:	Herefordshire Council
LPCS:	Local Plan Core Strategy
NPPF:	National Planning Policy Framework
NDP:	Aston Ingham Neighbourhood Development Plan Submission Draft October 2022
NPPG:	National Planning Practice Guidance
PHI:	Priority Habitat Inventory
QB:	Qualifying Body (Aston Ingham Parish Council)

Summary of representations	QB response
<p>Representation by Mr. Stallard</p> <p>Land at Ellsmere should not be allocated for housing development because of its ecological interest as a lowland meadow, flood risk and lack of services, when there are other sites available at Aston Bank and elsewhere.</p>	<p>Land at Ellsmere is allocated by NDP policy AST5 for housing and open space, the outcome of a process which included a Call for Sites, an independent Housing Site Assessment, and public consultation. Details can be found in section 5 of the Consultation Statement. Mr. Stallard is the owner of a housing option site at Aston Bank that was not selected for allocation. Correspondence with Mr. Stallard is dealt with at para. 5.8 of the Consultation Statement. In respect of the points now made, the QB responds as follows:</p> <p>Ecological interest: Ellsmere is a Traditional Orchard PHI site, not a lowland meadow. Information provided by the Ellsmere landowner explains the agricultural regime which has been followed in recent years (Consultation Statement Appendix A). Policy AST5 balances enabling housing development to meet LPCS requirements with securing habitat conservation. This is an approach which has been taken elsewhere in Herefordshire (Bishopstone NDP). The policy provides for public open space on the eastern part of the site, where there are surviving orchard trees. This is to be managed to provide for the long-term conservation, restoration, and enhancement of the Traditional Orchard PHI. The policy also requires the ecological management of land within Flood Zones 2 and 3 on the western and northern boundaries of the field to maintain and enhance biodiversity, recognising that the site is part of a wider ecological network. The QB considers that policy AST5 appropriately serves to promote the conservation, restoration and enhancement of priority habitats and ecological networks as sought by NPPF para. 179b.</p>

Summary of representations	QB response
	<p>Flood risk: the draft site allocation policy included a criterion in respect of flood risk, which set out how the issue would be managed. This draft policy was refined following representations by HC and the Environment Agency at the Regulation 14 stage. The requirements for a Flood Risk Assessment were further specified; all development required to be in Flood Zone 1, and reference made to the future ecological management of land in Flood Zones 2 and 3. In their Regulation 16 response, the Environment Agency note the changes made. The QB considers that policy AST5 makes suitable provision for the management of flood risk affecting the site.</p> <p>Services: the Ellsmere Call for Sites submission confirms the site has access to gas and electricity. For potable water, Dŵr Cymru Welsh Water indicated at Regulation 14 that there are water supply issues within the area and that they will advise at the planning application stage as to whether the site can be served by a public water supply without the need to await regulatory investment. This factor has been referenced in the NDP at para. 5.11 to draw it to the attention of developers. For foul drainage, Severn Trent at Regulation 16 note capacity concerns in respect of their Wastewater Treatment Works adjacent to the site. They recommend early engagement on the timing of proposed development to allow sufficient time for assessment and improvement if required. The QB considers that a proportionate assessment of service availability has been made with no indication that the proposed development cannot be suitably serviced.</p> <p>Alternative sites: an assessment of potential housing sites at Aston Ingham has been undertaken in line with NPPG and County-level guidance and practice. It has included an appraisal of options and an assessment of individual sites against clearly identified criteria. The Housing Site Assessment assessed seven sites, recommending two (Ellsmere and Aston Bank) for further consideration including public consultation which was undertaken in September 2021. The outcome of the process was to allocate the Ellsmere site in the NDP. The QB considers that a demonstrably transparent, consistent, and equitable process has been followed with regards to site assessment and selection.</p>

Aston Ingham Parish Council
23rd January 2023