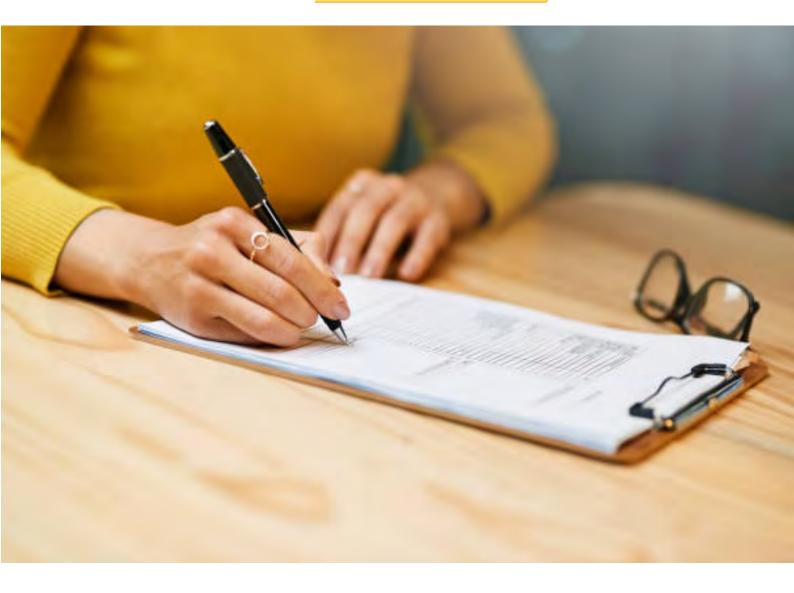
Herefordshire Council

Parish Council Questionnaire Results Local Plan 2021-2041

# February 2022





herefordshire.gov.uk

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# 1. Introduction

As part of the preparation of the Local Plan 2021-2041, there will be a series of consultations.

Ahead of the first consultation, the Council engaged with town and parish councils and their local communities to begin to understand the following:

- What parts the existing Core Strategy have or have not worked.
- What areas of planning policy are missing or could be improved.
- Whether the relationship between the county-wide policies and Neighbourhood Plans work or need to be improved.

A short questionnaire was sent out to provide some initial thoughts and help the Council in developing its future planning policies.

As part of preparing their responses, it was suggested that they may wish to engage with their local community.

Responding to this questionnaire was not intended to replace the need for specific comments from the Parish/Town Council to the forthcoming consultation on the spatial strategy and strategic options; however the comments gathered will inform ongoing work upon the Local Plan update.

# 2. The Consultation

A survey was sent to Herefordshire parish, town and city councils. The surveys can be viewed in the appendices.

The consultation ran from 11 October 2021 to the extended date of 31 January 2022.

# 3. Responses to the Consultation

In total, there were 52 responses to the survey.

As a result of analysis of responses, there are a number of key issues to consider in the preparation of the Plan.

The responses can be viewed in full in the Appendices.

# 4. What Happens Next?

All responses will be considered in the preparation of the Policy Options, which are due to be consulted on for 6 weeks, starting 4 April 2022. Further consultations will also take place. They include The Rural Settlement Hierarchy and Place Shaping Options, which will take place later in spring 2022.

Appendix 1

# Herefordshire Local Plan update – pre-consultation survey for Parish Councils

# **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

3. Are there any key planning policies that are missing from the current plan?

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

# **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

# Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

# Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

# Herefordshire Local Plan update – pre-consultation survey for Town Councils

# **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider have been successful or not? Please explain the reasons for your answer.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

3. Are there any key planning policies that are missing from the current plan?

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reasons for your answer.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

# Level of growth

1. Do you consider that the current housing targets for the city or town have helped to sustain its role as a service centre? Please explain the reasons for your answer.

2. What would you consider is required to improve or maintain its viability? Please explain the reasons for your answer.

3. Are there any constraints to new development in or around the city or town that would affect its ability to sustain future growth? Please explain the reasons for your answer.





# Herefordshire Local Plan update - pre-consultation survey

# **General Questions**

 What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

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3. Are there any key planning policies that are missing from the current plan?

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4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

Yes we think so.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

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### Current Core Strategy settlement hierarchy

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

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Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

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# Services and facilities

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What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

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# Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

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2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

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Thank you for taking the time to complete this survey.



# Herefordshire Local Plan update – pre-consultation survey

# **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

While many of the environmental policies themselves appear robust - eg SD1, SD3, SD4 (sustainable development, water resources, river water quality) - they are not widely applied and so have not delivered. Would suggest an overarching strategy bringing together policies to address biodiversity loss/net gain and climate change and clarity about the weight to be attached to these policies. At present, these policies are not well understood and are only rarely addressed in planning decisions.

RA6 - this policy requiring development is of appropriate scale, protects amenity of residents and prevents deterioration in water quality targets, is demonstrably a failure. In particular, the parish has seen a rapid growth in very large agricultural buildings with little regard paid to their impacts on water quality, local amenity or the landscape. More widely the rapid growth in the number of intensive poultry units and anaerobic digesters has had major adverse impacts on the environment and air and water and in particular across the county.

SS7 - addressing climate change - no evidence this policy understood or followed. Solar gain never considered and few new developments make provision for walking, cycling or public transport. Traffic generation and the carbon footprint of buildings and the activities they accommodate are rarely if ever addressed in planning decisions.

The policy also needs to be brought up to date, renewable energy is deemed to be an exceptional benefit where it is incorporated into new development, whereas it should be exceptional not to require it.

SD2 - renewable energy - needs to be tightened up to enable NDPs to exercise control over forms of renewable energy other than wind power and should address the adverse environmental impacts of such development on, for example, biodiversity, highways and air quality.

Policy LD4 (heritage) is not in accordance with NPPF and has failed to protect heritage assets (eg setting of Aymestrey church). It omits the NPPF presumption of refusal where there is harm to a designated heritage asset or its setting and fails to set out the statutory duty to "have special regard to the desirability of preserving the building or its setting."

Paras 1 & 4 of this policy create a presumption that heritage assets may be lost, whereas it should be clear that this is only acceptable in exceptional circumstances.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

As above. Clear the application of the above policies has failed to prevent a deterioration in biodiversity or result in an improvement in water quality.

Policy RA2 is no longer compliant with NPPF, which directs new development to sustainable locations and expects housing delivery to be achieved through larger sites.

NPPF Para. 73. The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).

The Core Strategy has failed to deliver affordable housing in areas that most need it. Paragraph 64 of the NPPF enables planning authorities to require affordable housing contributions from developments of 5 houses or even fewer and should be incorporated into a revised development plan.

This policy is likely to have delivered a significant number of affordable homes if it had been adopted with the Core Strategy in 2015. Instead, developers have deliberately opted for developments of 10 houses or fewer to avoid having to make affordable housing contributions.

3. Are there any key planning policies that are missing from the current plan?

Strategic policies required to address rural development with potential for significant impacts, such as intensive livestock units and renewable energy developments. These have the biggest impacts of any form of development in the county, including on landscape, highways, air, soil and water quality and need to be planned for.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

It is unclear what policies other than the delivery of residential development is devolved to NDPs.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Yes. It has supported refusal of planning applications that would have been in breach of the NDP.

# **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

It has enabled the granting of planning permission for a development that was strongly opposed by the parish council, local residents and Historic England and which, if implemented, will alter the character of the settlement in perpetuity.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

No. The settlement size is far too small, there is almost no public transport, very limited facilities and no services. Highway access to some of the settlements identified for growth, such as Leinthall Earls, is very poor. Where housing has been delivered in RA2 settlements it has often been large executive style homes and has failed to provide for local needs.

# Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

No. There has not been enough development to support the creation or retention of services. To the contrary, the village Post Office/shop was lost by the granting of planning permission allowing its conversion to a new dwelling, despite the business having been viable under the previous owner.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

Public Transport, schools/nursery, General Practitioner and dental services.

# Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Yes. Much of the land around the village is either within flood risk zone or areas vulnerable to surface water flooding. The parish is within a high quality landscape, with numerous heritage assets and good quality, though at risk, biodiversity.

The historic settlement pattern of Aymestrey village is tightly constrained and restricts scope for further development without harming its character.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

No. The settlement is too small. We have no services and almost no public transport.

Thank you for taking the time to complete this survey.

# Herefordshire Local Plan update – pre-consultation survey

# **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

MT1: Traffic Management: has proved to be a money wasting disaster. A second and/or third bridge with a complete outer ring road round the city should be considered.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

HR2 Rural exception sites: the policy needs to be more precisely documented to allow a property to be built on a rural site but not allow the site to develop into a larger one.

HR3: Need more 1 & 2-bed properties that are open market affordable to help people on to the property ladder and keep young people in the county.

SC1: Social & community facilities, partly funded by developer contribution, should not be left to be developed and run entirely by volunteers. HC should have more of an input.

SD2: Much greater emphasis on low carbon energy generation and better insulated houses.

SD3: Environmental quality needs to be improved – cleaner air and water. SD4: Better water quality: no sewage into rivers.

Better to rot all sewage in anaerobic digesters at the sewage works (never ending supply!) and use the methane produced to generate electricity. Capture the waste CO2 produced.

3. Are there any key planning policies that are missing from the current plan?

There is no policy for making alterations to a property without extending it.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

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4. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Yes, in that it slowed down the very rapid increase in housing in our group parish in the early stages of the plan period. To date, we have had approximately a 20% increase in housing stock since 2011. The vast majority of which have been built.

Policies in our plan have largely been respected by planning officers.

# Current Core Strategy settlement hierarchy

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

There has been an increase in the volume and speed of traffic with increased wear and tear on roads and pavements.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

It largely achieved the housing target required in some places but was found to be impossible in some rural areas so proportional growth is probably not the correct description.

Our parishes have achieved three times its affordable housing need but there has been a shortfall in open market affordable 1 & 2-bed properties that would help people on to the property ladder and keep young people in the county.

# Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

All existing services have been retained. Only new facility is a fish & chip shop.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

With a population of 2000, a medical centre with pharmacy would be valuable and would reduce travel.

Also, a full-time post office.

# Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Both schools are full. Electricity supply is shaky with frequent power cuts and the water pressure is variable. Mobile phone signals are poor.

Roads are overloaded. The A438 is very narrow with no scope for widening it. Restrictive bridge over the River Lugg – unsuitable for large vehicles and very dangerous for pedestrians.

There is no possibility for a safe continuous footway from one end of the group parish to the other.

A big improvement in infra-structure should precede any further development.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

No. We have already absorbed 160+ new properties alongside the original 837 – appox, 20% increase. We would like a pause, please!

Thank you for taking the time to complete this survey.



# Herefordshire Local Plan update – pre-consultation survey

# **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

Of the three key Policies in the Local Plan, Social Progress, Economic Prosperity and Environmental Quality as a rural parish we have been chiefly concerned with the strategies contained within H1,2,3 and 4, Social Progress.

We are satisfied that negotiations with the developers of the new houses built in the village identified in the Neighbourhood Plan ensured that the range and mix of housing types was appropriate and met the Local Plan policy in this regard. We have also been satisfied following the making of our Neighbourhood Development Plan that we have established a good working relationship with Planning Officers resulting in agreed decisions with the majority of new applications. Latterly, as a result of issues in the Lugg catchment area, applications for new dwellings are on hold pending a resolution of phosphate problems.

The parish is less happy with local issues concerning MT1, Traffic Management with TRO problems now outstanding in the parish for over three years. Hopefully this may soon be resolved but the parish has been effectively blocked from putting traffic management systems in place over the period of this Local Plan. We are equally concerned regarding the lack of local services and facilities as well as employment within the parish meaning that in this time of Climate management the community in general continues to rely on access to a car.

The Economic Prosperity policy has had little impact in the parish other than an increase in home working as a direct result of Covid. The community remains concerned about the quality and speeds of available wifi to support home working and commerce in general. Tourism and employment generally have taken a significant hit as a result of the pandemic and so it would be unreasonable to comment on this strategy in the circumstances and over which we have had no control.

The Environmental Quality Policy is a key strategy as far as this parish is concerned and in particular as we attempt to move towards zero carbon in 2030. We are particularly concerned about retaining and enhancing our local landscape and infrastructure in the face of new housing demand. We believe that the Local Plan so far has failed to deliver a quality water management strategy in the parish and that significant issues remain unresolved regarding flooding and poor waste management. As we have previously mentioned the Lugg river quality remains a significant problem. 2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

As a parish we have concerns, not so much with the policies themselves but rather more to do with their implementation and management. We have numerous examples of specialist agencies not communicating with one another and/or the local community and essentially working in isolation. We believe, if this is replicated across the county as a whole, this results in a complete waste of resources and therefore needs to be managed in a far more effective manner.

3. Are there any key planning policies that are missing from the current plan?

The current Local Plan is comprehensive, however it will require further review to manage the process of achieving zero carbon by 2030. This implies the need for significant changes in some aspects and strategies.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

We believe we have a comprehensive NDP with a broad range of policies still entirely relevant and at the right level. However we are aware that our plan is now over two years old and therefore a review process is being undertaken looking at existing policies, the need for new policies such as Climate, and additionally Settlement Boundaries to ensure the plan is now working efficiently and meeting the needs of the local community.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

We are satisfied that the majority of planning decisions in the Parish made over the last two years have followed the advice and proposals made at local level within the policies defined in the Neighbourhood Development Plan. Clearly in regard to Housing Development in the parish matters have been skewed as a result of phosphate issues in the Lugg catchment area.

# **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

The localised approach following the revised methodology with the objective of creating sustainable communities is an appropriate strategy providing the existing range of services can sustain the development, particularly in regard to local employment opportunities, minimising travel and minimum impact on existing infrastructure. This Parish at an early stage of the NDP created and approved a local housing development that meant the Parish actually exceeded the number of new dwellings required to meet Local Plan targets until 2031.

We are satisfied that new local housing has been carefully controlled to fit the intrinsic character of the village, to ensure it did not exacerbate local flooding problems and to not put existing infrastructure in difficulty. We are however concerned about the lack of local employment and the fact that additional housing has created a significant upturn in road traffic. Future housing development will need to address the impact on climate.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

We have been satisfied with the level of proportional growth identified in the RA2 Policy within the Local Plan and were particularly concerned to identify an appropriate site to develop a high quality sustainable site located within the main built up area in the village. We were equally concerned regarding a further significant housing application in the parish that was clearly demonstrated to be outside these parameters, that would have added to localised flooding problems, put unreasonable pressure on the parish infrastructure, and affected the local landscape. In the event this application was rejected after review on a number of counts .

# Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

Existing services to a large extent been retained having survived the lockdown. However the parish has lost its Post Office and this is a particular blow to the community. We do however now have a much improved mini supermarket located on the A417 and this is a considerable benefit to the parish, particularly our older residents. The parish would like to see further services provided in the medium to long term.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

The existing Parish Hall is currently full with business following the lockdown. However the building itself is showing signs of its age and no longer meets insulation or modern fuel efficiency standards. This is of major concern given the likely costs medium to long term.

If the parish is to meet Climate targets set by 2030 it will need to reduce car use significantly and introduce a far more efficient public transport system to and from the key employment areas. In addition the village will need to install car charging points to facilitate the switch to electric vehicles.

Ideally the parish should consider the development of a further retail facility located in the main village, together with a replacement post office. The primary school should be relocated to Bodenham Moor as the current location has no resident children and all children have to be transported to and from school, mainly by car.

SME's should be encouraged to sit alongside home working. These would provide local employment opportunities.

The church should consider the development of a secondary function to ensure its survival.

# Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Clearly one of the current constraints is the pollution in the Lugg leading to a hold on all housing development.

Both separate villages within the parish have particular concerns with flooding occurring on a regular basis and the identified and associated issues with the pumping station on the C1125.

The parish has met and exceeded its housing growth targets until 2031. The primary school is full and it is difficult to envisage any further development in its current location.

Lack of local employment and the resulting reliance on private cars together with a poor public transport system is a limiting factor.

Poor quality roads, many unclassified gives access concerns.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

We believe the parish has a sustainable community in its current state, and meets the housing growth targets through to 2031. Without improved service provision, improved local facilities and employment it is difficult to see how any further housing development could be visualised without impacting in a negative way on the local infrastructure.

Thank you for taking the time to complete this survey.



#### Herefordshire Local Plan update - pre-consultation survey

#### **General Questions**

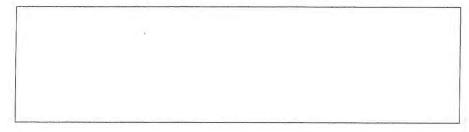
- 1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.
- POLICIES HAVE GENERALLY HAD LITTLE IMPACT ON LIFE IN BOTH PARISHES, FACILITIES & TRANSPORT NOT IMPROVED ETC.
- POLICIES SUCH AS MT1 & LD1 APPER TO BE RARELY CONSIDERED WHEN DETERMINING PLANNING ADPLICATION

- POLICY HY HAS BEEN OVERLY FOCUSED ON THESE AARISHES WITH LITTLE REGARD TO POWTS 1-7 WITHIN

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

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3. Are there any key planning policies that are missing from the current plan?



4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

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THEY WOULD BE IF UNIFORMLY APPLIED & PATRISH KNOWLEDGE + COMMENT LISTENED TO.

If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

MES - IN AS MUCH AS IT HAS BEEN USED IN JOME PLANNING DETERMINATIONS - DOESN'T ALWAMS APPEAR UNIFORMLY APPLIED THOUGH.

#### **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

DOESN'T TAKE INTO CONSIDERATION THAT JERNICES MAT HAVE BECOME OVERSUBSCRIBED DUE TO DENLOPMENT, AND ARE UNABLE TO SUPPORT FURTHER DWELLINGS -NEEDS UPDATING FREQUENTLY. 2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

NO. JUST ADDING DWELLINGS DOESNIT MAKE AN AREA SUSTAINABLE - NEEDS MATCHING DEVELOPMENT OF INFRASTRUCTURE.

#### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

- V. FEW SERVICES IN PARISHES. - NONE JPGRADED TO REFLECT INCREASE IN DWELLINGS

- What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.
- BETTER BUS SERVICE - NEW DOCTORS SURGERY
- MORE PRIMARY SCHOOL PLACES
- Sttop -
- BASIC IMPROVED IN FRASTRUCTURE
- IMPROVED HIGHWAYS

#### Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

CONSERVATION AREA - LACK OF ACCESS TO DOCTOR OR SCHOOL PLAKES LACK OF PUBLIC TRANSPORT SMALL HIGHWAY ROUTES UNABLE TO NATAN INCREASE IN TRAFFIC LACE OF INFRASTRUCTURE THROUGHOUT

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

WITHOUT DEVELOPMENT OF INFRASTRUCTURE ALONGSIDE - NO

#### Thank you for taking the time to complete this survey.

# Herefordshire Council

# **Brilley Parish Council**

# Herefordshire Local Plan update – pre-consultation survey

# **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

Proportionate growth concept is flawed. In many parts of the county parishes which have been allocated new housing targets based on proportionate growth have neither the infrastructure nor access to services to support the proposed growth.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

More focus needed on limiting second homes and conversion of houses from permanent residential occupancy to holiday lets. If there really is a housing shortage then second homes and conversion to holiday lets will exacerbate the problems and lead to increased green belt development.

3. Are there any key planning policies that are missing from the current plan?

See 2 above.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

Yes, if Herefordshire planners support the NDP by basing decisions on NDP policies. This does not seem to always happen.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

NDP is a success as it has increased local involvement and parish cohesion and it gives both parishioners and the parish council guidance and objective points on which to comment. Support for NDP can easily erode if HC are not seen to support the local policies.

# **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

NDP has been used to both support and object to planning applications. However some residents have been concerned about the level of allocated housing development under the proportionate growth system.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

No we do not. Many of the named settlements are isolated and with very poor roads, no public transport links and with very few services and are unsuitable for the housing growth targets allocated. Basically unsustainable.

# Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

Development in Brilley has had no effect at all on services. Nothing new has been provided.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

Brilley is unsuitable for significant growth as the level of infrastructure and services are very poor and could not reasonably be improved/increased in a cost effective way.

# Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Brilley road network is poor and unsuited to supporting significant development. Of the approx. 18 miles of roads in the parish only 0.9 miles is A class and this is sandwiched between the river Wye and a steep wooded bank. There are almost 5 miles of C class road and 12 miles of unclassified road. A significant length of the C roads is single track with no passing places and much is in poor condition and is unsuitable for even existing traffic. The unclassified roads are mainly very narrow and winding and some lengths are unsurfaced. Virtually all of the unclassified roads are little more than tracks on which a layer of macadam has been laid, the foundations are unsuitable for any traffic increase and the only 'passing places' are field gateways or private property entrances.

There is no mains sewerage in the parish so any development would need package treatment which is significantly less effective than mains treatment and which would contribute to ground water and River Wye contamination.

The parish is isolated and there are no schools, shops or health provision in the parish which inevitably means that transport is by private car.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

No. Please see above.

Thank you for taking the time to complete this survey.

# Herefordshire Local Plan update – pre-consultation survey

# **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

Policy SS3 – ensuring sufficient housing land supply

This has not worked well especially where NDP's are concerned, it has ensured that development has been allowed where otherwise it may not have been granted. HCC need to look at the reasons as to why this occurred to ensure the continued validity of NDP's

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

Affordable Housing – allocation of S106 monies seem to be hard to access!

- they seem to be given for some developments and not others?
- no notice is taken of local need, if a housing needs survey is
- undertaken, and need not established, housing is still permitted.

3. Are there any key planning policies that are missing from the current plan?

RA2 – more emphasis should be on building where the need is, instead of the more rural areas where a lack of facilities do not always ensure sustainable development

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

Yes, because they are driven by local knowledge as well as adhering to national/local plans.

Problems arise when determining planning applications and local knowledge does not always seem to be taken into account.

Little Hereford is a very rural parish with no centre, the core strategy does not make it clear where development should go although we are told that it should take some development.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Yes. There has been unwanted development, at the same time it has stopped a large development in the village.

Although our chosen site has not yet been developed, we are still on track with our housing targets

Little Hereford is expected to take some housing (this came in at the very last minute prior to the plan being adopted) and we remain unclear as to where this housing should go

# **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

Large developments are not suited for the parish – they are unsustainable due to a lack of facilities and amenities, local road infrastructure is not able to support further large volumes of traffic.

Development in Little Hereford remains a grey area, the rules changed just before the NDP was adopted and sites for development were not clearly thought through, we have been told that ribbon development will not be supported but further clarity is required for scattered communities such as Little Hereford where housing develom.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

Development in our parish does not always reflect local need – private housing tends to be too large, not only in the size of the whole development but in design too. Large detached 4+ bedroom houses do not sell easily, nor do they attract younger people into the village because they are unaffordable.

Housing policies should reflect this.

# Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

No! Up until a recent development our parish has received no S106 money for any development.

We have retained existing services only just with the pub and shop remaining open following threat of closure. The post office has reduced to one day a week and bus services have also reduced, yet further development continues.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

A complete review of road enhancement/improvement Increased education facilities Increased medical facilities

# Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

The lack of services and the poor state of the road infrastructure are the main reasons why future development in our parish should be considered very carefully.

Climate change is also having an impact especially where flooding is concerned from Brimfield/Wyson Brook and the River Severn. Further concreting will impact further these concerns.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

Yes, but in moderation. No development risks communities stagnating or dying, but growth should be in proportion to its surroundings.

Tourism, especially caravan/camping/holiday lets are flooding the area at present. These tourists do not necessarily support our local services, they are more likely to venture to Ludlow/Tenbury or further afield.

This is an area that we feel should not be further encouraged as there is enough both in the parish and locally in the surrounding area.

Thank you for taking the time to complete this survey.

# Herefordshire Council

# Herefordshire Local Plan update – pre-consultation survey

# **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider have been successful or not? Please explain the reasons for your answer.

Neither the volume of housing development nor the hosing mix required has been delivered. The current moratorium on new housing development affecting both the Lugg and Wye catchment areas has not helped.

The strategy acknowledged the need for significant investment in transport infrastructure but this has been torpedoed by the cancellation of the western bypass. The cancellation of this major project penalises not only Herefordshire but also neighbouring counties and partners in the Marches Freight Transport Strategy.

There has been good progress in improving broadband but there is further to go.

The policy has been successful for Hereford City, in the Market Towns it is not the case. All monies have been invested in Hereford. Rotherwas is now a thriving industrial area with the majority of new businesses being directed there, or Ross-on-Wye. We in Bromyard are still waiting to have investment and new industries but can't do so because we lack 5 hectares of land for industries.

BY1 Development in Bromyard in particular employment land (5 hectares) has yet to be determined. We cannot sustain or achieve housing quotas especially for local and affordable housing without economic employment growth, encouraging new businesses to the area and retaining young adults to stay in the county and not to leave due to no job or career prospects.

RA2 Housing in settlements outside Hereford and the market towns.

This has not been successful. In the Core Strategy it is headed as Place Shaping-Rural Areas - whilst it is acknowledged we need housing, that the rate and density of some developments have completely changed some rural villages. Also, the proportionate availability of affordable housing does little to alleviate the housing shortage of affordable homes for local people often pricing them out of the village.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

The Core Strategy looks to develop the tourist economy and revitalise town centres. While there has been some progress in developing Hereford, with more to come through the Hereford BID project, the market towns have not been revitalised to any marked extent. It is not clear that that the tourist economy has been significantly developed. These two policy areas have scope for significant improvement.

Hereford has an excellent Sixth Form College and the development of NMITE is very welcome and may encourage start-up culture but attracting housing and jobs through inward investment will be important if young people are to be attracted and retained.

Mmore expensive homes have been developed in green field sites. We require affordable homes to encourage more younger, educated people to stay in the area, not leave Herefordshire and live elsewhere because they can't afford a home.

MT1 Promoting active travel - whilst this may be encouraging within Hereford itself, Beryl Bikes for example, they do not work in other areas of the county where dependency on private vehicles is a necessity and not an option. Improvement in the transport infrastructure is needed particularly in the Market Towns. Access to a good bus network, to promote and encourage other forms of transport especially for shorter journeys in an environmentally sustainable, yet achievable way for locals and tourists alike.

 Are there any key planning policies that are missing from the current plan?
 There is not a properly developed transport strategy for the county as a whole. There is some vision but no clear ideas as to how it is to be achieved.
 Increased policy on infrastructure is required; better electrical supplies and water,

especially in Bromyard where some houses experience low pressure or no water at all due to local demand.

The state of the roads is poor, apart from the A49 because this is maintained by the Highways England.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reasons for your answer.

No. Greater devolvement of decision making to the market towns would enable them better to develop their unique characters and meet local needs.

The idea of an NDP is reasonable until it is investigated, for a Market Town to develop an NDP costs in excess of £40k, whereas grants available only cover a small amount of the cost. For a small parish it is ideal but a more realistic vision is required.

With many NDPs still in planning or consultation stages it gives developers a means to bypass them and even using a NDP as a reason for a planning application especially when a planning application is not covered under the call for sites. NDPs should have more powers to protect the area that they relate to.

If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.
 Not applicable

# Level of growth

1. Do you consider that the current housing targets for the city or town have helped to sustain its role as a service centre? Please explain the reasons for your answer.

The targets are reasonable but they have not been delivered, Bromyard needs more people, which means more housing to maintain the viability of local businesses and our secondary school.

No. Herefordshire Council exceeded the total in the strategy <u>but</u> a majority have been built in rural areas on green filed sites, flood plains etc. To be successful, infrastructure must be developed and maintained not leave it to the developer, surely the s106 monies could be used to develop infrastructure. We lack vision, more and improved broadband, sort out the nitrates and phosphates, better sewerage systems, better roads including the Hereford bypass. Don't waste money on consultations.

Housing targets are yet to be delivered. Growth cannot be measured without needed housing.

2. What would you consider is required to improve or maintain its viability? Please explain the reasons for your answer.

Massive investment in infrastructure – water, sewerage, roads plus support for existing businesses and incentives for new businesses.

Viability – retain young educated people, give them some incentive not to leave their local homes because of lack of opportunity, house process in the rural areas £300k start process.

The 6<sup>th</sup> form in Hereford is excellent, Holme Lacy is excellent then the more able students go to university then do not come back!

A by-pass to the industrial estate, better transport links and services to encourage new businesses and maintain current ones.

3. Are there any constraints to new development in or around the city or town that would affect its ability to sustain future growth? Please explain the reasons for your answer.

There is a shortage of employment land. The lack of a relief road is a major hindrance. Limitations on both water supply and drainage, including sewerage, hamper housing development. A second doctors' surgery will be required to facilitate population growth.

Lack of infrastructure – insufficient sewerage, water, electricity, high tech employment; one person in a bedroom on a computer is not sustaining growth. Lack of doctor surgeries, dentists etc., in rural market towns

More and better public transport, better schools offering a wider curriculum to motivate knowledge.

Do not rely on volunteers to run services.

More realistic emerging plans, don't keep everything in Hereford.

BY1 Development in Bromyard in particular employment land (5 hectares) has yet to be determined. We cannot sustain or achieve housing quotas especially for local and affordable housing without economic employment growth encouraging new businesses to the area and retaining young adults to stay in the county and not to leave due to no job or career prospects.



### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

We understand that our element of the core strategy as a Parish has been met, so this element must have been successful. It is clear that in rural areas there have been major infrastructure shortcomings to developments.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

We think the lack of staff and cohesion in the planning department has fundamentally affected the Core Strategy effectiveness of the Planning Department.

3. Are there any key planning policies that are missing from the current plan?

There is always a lack infrastructure built into new developments as they go forward.

There is a distinct lack of awareness of the solutions to the critical state of our rivers and streams, in that effluent, fertilizer and general pollution is adversely affecting our rivers.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

No we don't believe is it at the right level, it has been too much for the infrastructure to cope with. In-filling in Grafton Lane and Twyford should no longer be put forward as a solution. The developments are not compatible with what is achievable in the Parish, so the core strategy was fundamentally flawed in putting forward these areas for possible infilling and development.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

A partial success.

Some aspects have stood up quite well, and others have failed The NDP should carry more weight, sometimes the Council has ignored it.

#### **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

We think you should clarify your meaning of hierarchy and come back with a fully comprehensive explanation of what you mean.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

No.

#### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

No There have been no new improvements or facilities in the Parish. 2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

#### Healthcare

There are virtually no transport facilities in the area.

There are no medical facilities at all in the Parish, to access these facilities parishioners have to travel outside the Parish.

No further development should be considered in this area until there are significant improvements to the infrastructure.

### Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Lack of infrastructure. As above

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

No, we don't think it is an appropriate area for development because it is essentially a rural area, and we think it should be supported as such. The introduction of more cycle paths and leisure activities would be more compatible with the rural nature of the area.



#### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

3. Are there any key planning policies that are missing from the current plan?

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

We think our Neigbourhood Plan has been successful as a tool for influencing and assessing development in the parish. However, that success has been limited because Development Management officers sometimes seem not to take Plan policies seriously and treat them as optional add-ons to county and national policies.

# **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

Numbers of new dwellings have greatly exceeded the target for the parish due to the enforced lack of an upper ceiling and a surge of windfall dwellings within the settlement boundary. 2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

# Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

There is a lack of proportionate investment across the board including health and education. Inadequate spending on road maintenance and improvements, especially on road safety, is a particular concern in Cusop.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

### Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

The Hay / Cusop settlement is remote from the main economic centres on both sides of the border and linked to them by long slow B roads, so there must be a limit to how much development can be put in such a location. Within Cusop the location and size of suitable sites for new housing are limited by narrow minor roads and bottlenecks in the network.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

Cusop is well served by Hay but limited by roads and transport links to services outside the area. Its potential for growth will depend on Herefordshire Council's strategy for the relationship between transport and services. If the shift from fossil fuels goes ahead this will have to be radically different: according to a Government minister recently, private car ownership will largely be replaced by public transport services. If existing rural communities are to continue to be viable, let alone grow, the provision of jobs and services may have to be completely re-thought, eg more home-working? more home schooling? mobile health services? decentralised Council services?

### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

We don't know enough about it to comment. It would be really helpful to have a briefing on the core strategy, provided to all Parish Councils, and some training to understand whats relevant. Even providing a link to the relevant document in this questionnaire would have been helpful.

Is this one that we should be referencing? https://councillors.herefordshire.gov.uk/documents/s50028641/CS\_for\_Council.pdf

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

See above, and of course implementation!

3. Are there any key planning policies that are missing from the current plan?

Is there an implementation, monitoring and auditing policy?

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

The list of policies appear to be relevant and appropriate for our settlements within our parishes. More important is how and when the policies are implemented and monitored.

For example, EV Charger policy – how is this implemented and monitored for all the new housing developments, and redevelopments; could solar panels be subsidised for all public buildings?

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Not applicable – our NDP is still in development

### **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

Little as yet. There has only been limited infill development in Dormington and Priors Frome, and there has been a small development at Sufton (Shepherds Orchard). An area for development has been identified in Mordiford but nothing further has happened as yet. 2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

Possibly, if you are referring to the larger settlements in Herefordshire but we don't know if this is the case for sure.

However, this doesn't as yet apply specifically to ours (Dormington, Mordiford, Checkley).

# Services and facilities

1. Have existing services been retained or new services and facilities provided

Yes the bus service has been retained, and another one has been subsidised by the Parish council.

There are also several buses a day from Mordiford and could support someone using for work in Hereford of needed.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

The school at Mordiford will need to expand as its now at maximum capacity. We need a community centre as there is currently nowhere for the community to meet for social or other events.

We have lost our village shop at Mordiford and now only have a mobile post office once a week.

School expansion; local grocery shops, more buses, public electric vehicle chargers in school car park, affordable housing developments.

Without these, the villages and settlements will have no reason for existence; better local employment opportunities are needed and better public transport to allow people to get to work.

# Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Our area comprises Dormington, Mordiford and Checkley, a largely rural and dispersed community.

In this large area, we have one pub, one primary school (full to capacity), no shops, three churches and a monthly bus service to Ross, that the Parish Council subsidises. The most densely settled area is in Mordiford, and there is only one area identified for development there.

Much of the area is within the AONB and much is within the flood plain of the Wye catchment area - development could result in damage to the flood plain and continued pollution of the rivers. This is a big constraint.

New development would have to be carefully considered so it didn't impact on the surrounding landscape, making the villages more visible in a rural area.

There are few opportunities for employment in the area, making it necessary for people to travel some distance to work, but public transport currently would not support this. However, there are several buses a day from Mordiford and could support someone using for work in Hereford of needed.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

Our area comprises Dormington, Mordiford and Checkley, a largely rural and dispersed community.

In this large area, we have one pub, one primary school (full to capacity), no shops, three churches and a monthly bus service to Ross, that the Parish Council subsidises. The most densely settled area is in Mordiford, and there is only one area identified for development there.

Much of the area is within the AONB and much is within the flood plain of the Wye catchment area - development could result in continued pollution of the rivers.

There are 400 hundred houses, but few affordable houses, and nothing for first time buyers. This aspect should be the focus of growth, but with the current infrastructure, it doesn't seem to be a sustainable community.



#### General Questions

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

Transport package not delivered Insufficient five year land supply resulting in pressure to grant planning applications for housing when the neighbourhood plan was over two years old Public transport availability and cost to those living in villages outside the city

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

3. Are there any key planning policies that are missing from the current plan?

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Largely successful, further clarification on open spaces required. Two building applications with pre planning advice, one on open space between Chapel Lane & old road to Peterchurch One on site outside the settlement area Two portal frame buildings for conversion into housing, initially consultation indicated PC could not comment, on second one clarification on comments given, this has not been circulated to PC's This type of conversion not covered by NDP

# Current Core Strategy settlement hierarchy

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

Changes to key services, e.g mobile post office only once weekly, no preschool, no library, no shop Dorstne hub is with Peterchurch, no very good or good transport accessibility 2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

# Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

No new services and facilities provided through 106 money, developments; single or two houses, five houses. Need to review the 106 money for development for more than two houses

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

Improve broadband/mobile phone signal for working from home

Currently unable to feed any local electricity into the grid due to capacity Improvement on public transport, linking road/rail

## Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Limited land within the settlement area No main sewerage system New development requires affordable housing

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

Sustainable communities where people want to live and work, lack of affordable housing to encourage young or housing enabling existing residents to downsize & remain



#### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

From a local view the CS has inconsistencies and can be read in a contradictory fashion but can be supportive of Eardisland NDP (ENDP). CS for rural areas is heavily reliant on NDPs, main thrust of CS is focussed on city and market towns but over 50% of county population live in rural areas.

Most of the CS period has been shaped by lack of a 5 year land supply and the phosphate moratorium, so the CS has had limited use.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

Time has changed so very limited reference to addressing climate change and biodiversity/carbon/natural capital. These are critical matters for now and need strengthening, expansion and enhancement, so intentions cannot be ignored. From local point of view on tourist trail, want to see architectural vernacular maintained and supported.

Advisory aspects of eco and green policies need to be mandated.

3. Are there any key planning policies that are missing from the current plan?

Agricultural and land use that drains into Lugg/Wye catchment should be required to plant buffer strips to reduce run-off, need to be policy. Phosphate pollution must be controlled by policy.

Policy to support presumption in favour of self-build/custom build.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

From local point of view, if planning officers are supported, trained and have manageable caseloads, NDP policies, aims and objectives are at right level in most cases.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Generally yes.

If we rewrite the NDP there are some policies and objectives that we would expand/change and additional criteria would be added, most significantly aspects relating to flooding and environment.

# **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

Environmental constraints have restricted our ability to deliver target housing numbers. Target numbers which in themselves are inappropriate given the environmental constraints and the tourist aspect of Eardisland. Serious thought needs to be given to the situation of Eardisland in the current settlement hierarchy.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

No. some villages have been able to meet and surpass growth targets but sometimes with damaging impact.

More support should be given to villages who have provided significant growth to enable smaller schemes and more organic growth going forward.

And villages that have not provided the same level of proportional growth should not be expected to meet the shortfall.

The infilling of all spaces within settlement boundaries is not always the best solution as it can eradicate important green spaces in villages and does not reflect the historical growth pattern.

Local distinctiveness has been eroded by a lack of vision on allocation of sites away from settlement boundaries, which could address specific housing needs for families and younger people – needs reconsidering as a concept of carefully developing hamlets. CS needs to be receptive and reflective of local settlement distinctiveness, particularly in areas where flood risk is significant.

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

Businesses and facilities that were here when the CS was written remain very much unchanged – apart form more holiday homes and an expanded caravan park, which are of mixed benefit to the parish. But at the same time a second tea room/gift shop and an aquarium/fishing shop have closed.

We are also aware that parishioners use facilities and services in nearby villages and more consideration should be given in CS to interconnected rural communities that support one another.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

A bigger shop and post office, tea room/pub/restaurant, village hall as a minimum. But also good broadband and the ability for people to work from home – as working from home opportunities help a rural village feel alive rather than a commuter village – and a reliable regular transport service to Hereford and market towns.

## Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

The flood risk impacts most parts of the village but not all. The PC needs to be allowed to be strategic about allocations.

Consideration of river and soil pollution issues and the impact of industrial/intensive agricultural activity on the village.

Even areas that do not flood are significantly impacted by the inability to move in and out of the village during flood events.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

As currently situated with the flood risk, no for the village.

However outside the settlement boundary proportionate growth could be possible if allocation was allowed and managed to meet local needs, among other things.



#### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

We are a rural community with a NDP. Our Parish Council planning group focus on policies detailed in our NDP when considering an application. The key aspects of the Core Strategy which impact our parish are those relating to the implementation by HC of policies in the NDP. We have detailed our experience in this regard in the later sections of this survey.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

Many applicants do not seem familiar with planning policy, so clearer provision of information for applicants, using simple straight forward language (with a key to acronyms) at the start of every communication would be helpful. Many applications make no reference to the local NP or HCs Climate Checklist. It would be helpful if the planning portal made clear that applications will not be considered in the absence of a commentary describing how an application either meets relevant policies, or reasons for being unable to do so.

3. Are there any key planning policies that are missing from the current plan?

It might be helpful to include some county wide policies which could be implemented by individual parishes, dependent upon local conditions. Such policies may include:

1 - A policy to enable parishes to limit the number of weeks per year that rural housing can be let on a weekly holiday let basis (such as on AirBnB) in order to help increase the availability of long term rentals for local families. Guidance regarding Change of Use rules for letting private homes/annexes as holiday lets would also be helpful.

2 - A policy enforcing a requirement for individual home owners to complete all aspects of the scheme for which approval was granted. This would be particularly helpful in cases where approval was granted contingent on the inclusion of specific measures designed to mitigate the impact of otherwise unsightly/intrusive features.

3 –A policy to ensure that areas within the AONB and SSSi areas have pre agreed arrangements regarding the need to protect areas from building – this may mean in some cases that little growth has to be accepted.

4 – A policy to ensure the enforcement of AONB specific policies (such as Dark Skies Policy)

5 – Policies to support the development of public transport, car sharing, cycle routes and use of electric vehicles in rural areas.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

The policy areas that are devolved to NDPs are reasonable. Unfortunately, the implementation of those policies has not been supported consistently by the county planning department. As a result, confidence in the value of a NDP has been undermined

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

The NDP could be considered successful in the context that development has been restricted to allocated sites. However, the type of development on the allocated sites has not met the criteria set out in our NDP policies, which has been very disappointing. This appears to have been a result of HC Planning Dept paying little attention to NDPs during the period when the weight of plans older than 2 years was reduced due to HCs failure to demonstrate a 5 year land supply. With the exception of a small number of staff, HC planning personnel seem uninterested in the content (or application) of policies contained within a NDP.

## **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

Our parish was designated a "main focus" of rural development in the current core strategy. Accordingly, we identified a number of development sites in our NDP, which together with anticipated windfalls were expected to meet our housing allocation. We were constrained by a local preference for small developments, as identified during the NDP consultation process. Although several of our sites were allocated for 10 or fewer houses, we specified that each development should include an element of affordable housing.

Unfortunately, HC planning department approved outline applications which did not include affordable housing. As a community, we feel that we have met the expectations of the county by offering sites that have helped to provide Herefordshire with a 5 year land supply, but have not received the anticipated benefit of affordable housing for our local residents.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

No. Policy RA2 states that development should "*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*". In practice, developers have sought (and been given) approval to build houses that will sell easily and profitably – ie – "executive detached homes". These homes tend to attract buyers from outside the local area who commute to work and do not contribute to the local economy or community. They are not attractive or affordable to many local families and do not reflect local demand.

## Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

No developments have been completed and no new services have been provided to date. All existing businesses and services (other than one business owner who retired) have been retained through the resources of the business owners themselves. In the case of developments which generate S106 money, the allocation of funds appear to be determined by HC with little input from the parish.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

Potential for further development is severely constrained (see below), however, were additional growth to be permitted it would be vital to improve existing sewage and storm water drainage systems.

## Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

No new homes have been delivered from any of the sites identified in our NDP, partly due to planning issues. Our position in the Wye Valley AONB, our proximity to SSSI's, flood risk, vehicle access and drainage issues would make it extremely difficult to identify any additional sites. Local preference, as expressed during our NDP consultation process is for small developments. Enlarging the currently proposed sites to accommodate additional development would result in large scale development which would be contrary to the views expressed by residents during our consultation process.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

No. So far, we have not seen any benefit to the local community resulting from the allocation of sites in our NDP. Our local businesses and services are currently thriving and do not appear to be dependent upon additional development. We were told that an adopted NDP would have legal status until 2031, however, the indifference towards our NDP shown by HC Planners when considering applications has resulted in parishioners losing faith in the planning process. It is extremely unlikely that any further development, other than housing aimed specifically at local families, would be welcomed by the local community.



#### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

No apparent progress on measures to reduce traffic through Hereford. A key element of the currrent plan is a bypass which the council failed to progress. It still offers no certainty on what infrastructure alternatives will be pursued.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

Greater consideration of the road infrastructure and mains services needed to support housing development. These need to be monitored to ensure less hold ups.

3. Are there any key planning policies that are missing from the current plan?

Time implication – keeping to timelines for completion

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

We do not have an NDP so unable to comment

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

N/A

# Current Core Strategy settlement hierarchy

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

We are low on the settlement hierarchy. This is correct as we have very limited infrastructure and services to support additional housing

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

We welcome the Lengthsman scheme which gives us greater local control of minor road maintenance.

The bus service through the parish has been reduced, with no evening service any more.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

Improved transport links to support more houses. Particular consideration needs to be given to how to do this while aiming to reduce road traffic across the county and in particular through Hereford

# Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Land ownership is concentrated with a few landowners. Main industry is farming

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

No, development restrictions due to land ownership



#### General Questions

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

3. Are there any key planning policies that are missing from the current plan?

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

### No

Neighbourhood plans should carry more weight and be binding. Currently they are taking into account but often ignored.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Yes adopted.

This plan has helped to ensure development in the Parish is controlled withing settlement boundaries. It allows the rural open countryside of the Parish to be maintained.

## **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

RA2 was designated for part of our parish. This has caused significant over development far beyond the targets set under the core strategy.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

Yes To some extent.

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

#### No

Substantial 106 monies have accrued from development in the Parsi but the majority of the monies have not been spent.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

Improved infrastructure in schools drainage and mains sewage car charging points Fibre broadband expansion Passing places in the narrow lanes of the Parish Comprehensive cycle ways Improve electric bus services

### Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Poor infrastructure Single track roads No Mains sewage Watercourses discharge into the Lugg Lack of rural footpaths and cycleways Maintenance of footpaths. Much of the open countryside within the parish was constrained from development to allow construction of phase 2 of the western bypass. Although now on hold this land should be retained for future highways infrastructure. 2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

## Yes

Although the Parish has already been overdeveloped with the Furlongs, Holmer West development, Canon Pyon and Holmer house Farm development. 1000 plus houses. We appreciate these developments allow Hereford city to Grow but further development within the Parish would be unwelcome.

## Herefordshire Local Plan update – pre-consultation survey Kings Caple Parish Council

### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

Particularly in respect of rural villages it is our view that the 2015 Core Strategy is seriously flawed and fails to provide policies likely to lead to development that can properly be described as sustainable. The key failings in the CS can be summarized as follows.

## **Overall housing target**

The overall housing target for the 20-year period 2011-31 was in our view set too high. The demographic projections in the 2013 Housing Market Assessment suggested a 20year target of 14500 based on demographic projections; by 2015 this estimate had been reduced to 14200. Even allowing for optimum economic growth the figure generated by the authors of the assessment was lower than the figure fixed on by HC of 16500.

In practice it is difficult to know whether either the demographic or economic forecasts used to inform the Council's target figure of 16500 houses was justified. In 2019 a revised version of the National Planning Policy Framework required each local planning authority to adopt a centrally calculated housing need target figure This approach is known as the standard method.

However, according to a report prepared by the HCIU in 2019, the new housing built by 2031, despite low completion rates during years immediately following 2015, was likely to reach a figure of 18000. This would equate to a figure similar to that advocated in 2008 in the superseded Regional Spatial Strategy – a figure that was widely regarded as one too ambitious for the county's economic potential. It is not easy to see whether this level of outcome has alleviated the real housing needs of Herefordshire or whether the county's economic growth has fulfilled the level of expectation expressed in documents such as *Invest Herefordshire* (2016).

The situation is complicated and compounded by the principles underpinning the so-called standard method. This gives a 20-year housing target for Herefordshire of 16920. It has two questionable features. It takes as its baseline the 2015 Core Strategy target, which, as stated above, may not have been justified. Additionally, it includes an affordability uplift algorithm which increases the housing need target where house prices are high relative to work-place incomes. This methodology appears to be based on the theory that prices depend solely on supply of a commodity, whereas it has been known since the 16<sup>th</sup> century that price levels are in fact determined by the relationship between supply of commodity and supply of money. The Herefordshire housing market is not a hermetically sealed entity, since potential purchasers may come from beyond the county. Such purchasers may include those retired, potential second home owners or long-distance commuters; areas of

the county near to the M50 will be particularly attractive to the latter category in view of relatively easy access to Cardiff, Bristol and Birmingham. However, such development would run counter to national and county environmental policy. In any case potential house buyers from outside Herefordshire are likely to come from areas with higher workplace incomes, thus rendering ineffective any likelihood of substantially depressing house prices.

It is a matter of some concern to compare the approach of the *Housing Market Assessment* of 2013-15 with that produced in 2021. The former appears based on an analysis of relevant data whereas the latter appears to be at least in part concerned with accommodating the pre-set numbers generated by the standard method. This is particularly the case in its treatment of housing mix, which advocates particularly in rural areas a much larger proportion of four-bedroom housing than recommended in the earlier report. The 2015 Core Strategy in considering rural housing in the county quite correctly notes with concern 'an existing housing mix that is heavily skewed towards higher value properties' (para 4.8.19). This problem has not in our view been sufficiently addressed since 2015, and the latest *HMA* seems more likely to exacerbate this situation than to rectify it.

## Facilities and Infra-structure

The National Planning Policy Framework sets out what it describes as the three objectives that must be realized to ensure the planning system delivers sustainable development. Among other things these will promote accessible services and identify and co-ordinate the provision of infrastructure (NPPF rev 2021 para 8). Clearly some facilities such as public houses are provided by private commercial operators and will generally enrich rather than be essential to any community; there are, however, others which are more essential, and these are likely to be provided by local authorities or central government. Though individual planning applications are not specifically required to respond to the three objectives, it seems obvious that the provision of essential facilities and infrastructure should precede or at least co-incide with the development of new housing.

Between 2010 and 2013, however, Herefordshire Council abandoned its original preferred option for rural development, which had been a more sophisticated and well-reasoned successor to the predecessor UDP. Along with increasing the proportion of the county's housing target in rural villages and drastically altering the rural settlement hierarchy, the new preferred option tendentiously justified this approach by a principle that might be described as progressive sustainability. Effectively this could be summarized as follows: never mind the facilities and infrastructure, build the houses and the rest will follow naturally.

This assumption may well be theoretically justified in the case of privately operated enriching facilities such as pubs (though there has been little evidence of this since 2015), but it is demonstrably and disastrously unjustified in relation to the provision of transport, health and education services. In particular all residents of the county suffer from the wholly inadequate size of Hereford County Hospital, which long before the beginning of the pandemic, fell far short of being able to provide timely treatment to the population it serves. (See further below.)

The inescapable conclusion is that Herefordshire Council and central government are in breach of their responsibility to support the key objectives of the NPPF.

# **Rural Settlement Hierarchy**

For smaller rural settlements the most unsatisfactory aspect of the 2015 Core Strategy is radical alterations it made to the county's rural settlement hierarchy. These were flawed in their fundamental concept and developed from a confused and inaccurate evidence base. This matter will be addressed below.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

# Housing need targets

There needs, as far as the County Council is able to influence this matter, to be an estimate of housing needs which is based on realistic demographic predictions. This also means that the population growth estimates should reflect the capacity of the local employment market to provide opportunity that does not involve long distance commuting. It also requires a long-term economic plan that is generated from an informed vision rather than fantasy. In as much as central government dictates housing need targets, every effort should be made by Herefordshire Council, for example by contact with local MPs, to persuade central government that its current standard method has defects and is still too dependent on simplistic algorithms. Many of the solutions proposed in *Planning for the Future* should likewise be judged as impractical and simplistic.

# **Housing Mix**

In terms of prescribing a desired rural housing mix the new core strategy should continue to reflect the judgment made in para 4.8 19 of the 2015 Core Strategy and restrict to low levels the number of new 4-bedroom executive homes so as to promote the availability of market starter homes and avoid attracting into the county numbers of residents not dependent on Herefordshire's relatively modest local workplace income level.

# **Rural Settlement Hierarchy**

The radical revision of the assessment methodology used to establish the rural settlement hierarchy is from our point of view the most important issue in the preparation of a new Core Strategy. (See below.)

# Infrastructure and Facilities

A mechanism to provide a more robust policy link to test that adequate infrastructure and facilities which fall within the responsibility of local or central government should be available at the outset to underpin development before it is permitted. This would honour the principle of para 8 of the *NPPF*.

# **Protection of the Environment**

Issues such as domestic property foul water and surface water drainage, run-off from intensive arable operations and potential pollution from plants such as intensive chicken houses and digesters are governed by distinct groups of policies, monitored by specialist, often statutory, bodies. Living in a parish that is bounded on three sides by the Wye, our residents' observation of its current condition suggests that both policies and the scrutiny to which they are subjected are probably inadequate. A new core strategy may be able to address some of these problems.

3. Are there any key planning policies that are missing from the current plan?

Possible identification of a major new settlement outside Hereford or the market towns. See below under Services and Facilities section 2.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

We should prefer to address this through our answer to the next section.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

The Kings Caple NDP was adopted four years ago. The parish lies entirely within the Wye Valley AONB.

First it is necessary to acknowledge Herefordshire Council's very committed and detailed support mechanisms to us as we developed our plan. In retrospect it seems to us that there are two pathways open to an NDP steering group. Its members can write the plan themselves drawing on the support and advice of planning professionals (whose identification and provision to us was brokered by the County Council NDP team). Alternatively, they can call in a professional expert to write the entire plan, outlining to him or her in more or less broad terms what they want. The first of these methods is likely to lead to a plan more closely aligned to local aspirations but to require substantial editing by the external examiner. The second method may produce a plan which has not involved local aspirations so intimately but has a greater professional polish and provokes fewer drafting alterations at examination stage. The Kings Caple steering group adopted the first method.

The NDP procedure presents a number of inherent obstacles. There may be inadequate congruence between offered sites and the NDP preferred policy priorities. Non-co-operation resulting from conflict between land-owners and the parish council may prove a virtually insurmountable bar to progress. The enormous financial gains open to landowners whose land is allocated by the NDP may frustrate any agreement within a village community or severely distort the eventual outcome. The external examiner of our NDP criticized us for asking the LPA to conduct a specific call for sites on our behalf rather than undertaking this ourselves, believing that by doing so we put too much of a distance between ourselves and landowners. We believed our method proved a better way of avoiding suspicions of favouritism and inappropriate influence.

Since the adoption of our NDP we have observed a number of complaints in other parishes regarding planning determinations contrary to the relevant NDP. As far as our own NDP is concerned we believe that all applications for residential developments have been handled correctly. There have been two agricultural building applications which have in our view been determined contrary to both the relevant policies of the NDP and those of the core strategy.

The problems we have observed in other NDPs often appear to have arisen because of the variable effectiveness of the regulation 16 consultation and/or of the external examination. The former may fail to indicate all the possible errors and inconsistencies within a plan, whilst it appears different external examiners have on occasions different interpretations of national and LPA planning policies that must underpin all NDPs. Consequently, some applications may appear to contradict an NDP, but in the view of an experienced case officer may, if refused, provoke a successful appeal.

One factor which influenced the Kings Caple steering group in identifying its preferred choice of an external examiner was his stated commitment to facilitating plans that were proof against successful appeals. The alterations he made to our plan in this respect were certainly effective. However, one aspect of his revision had unfortunate consequences. Our plan identified two offered sites for allocation at the edge of the then existing settlement boundary. These were in our view large enough to accommodate most but not all of the minimum number of new dwellings required by the 2015 Core Strategy, the remainder to be covered by windfall development. The density of housing our NDP proposed was in line with Core Strategy statements about the desirability of congruence of layout with adjoining properties, and this was confirmed in a policy in the NDP accepted by both regulation 16 and external examination scrutiny. However, the examiner nearly doubled the number of dwellings recommended for the larger of the two allocated sites in line with a centrally driven formula for the economic use of land. Given the relative isolation and landscape sensitivity of our parish, this outcome is extremely undesirable and likely to cause serious and permanent detriment to an AONB settlement. In fact, the examiner's decision seems to have resulted from his recognition of the importance villagers attached to preserving their landscape heritage, and his consequent steer to remove the threat of opportunistic developers exploiting the allocation of a part of the core strategy housing target to windfall development as our plan had originally advocated.

What this reveals is that, despite good intentions, careful drafting, strong support from the Council's NDP team and generally effective determination of residential planning applications, the impact of planning policy in Kings Caple has been seriously compromised

by the rural settlement hierarchy which finally emerged as the preferred option in the 2015 Core Strategy. This imposed a wholly inappropriate market housing quota on a parish located on a prominent and sensitive settlement site within an AONB and surrounded on three sides by the River Wye.

One further general point needs to be made about the national course of the NDP initiative since 2011. In 2019 a second edition of the *NPPF* was introduced which developed a concept of out-of-date plans. It appeared that an NDP could be judged out of date if the LPA's plan into which the NDP was incorporated had failed to deliver an adequate five-year supply of housing land; adjusted calculations relating to these county-wide requirements were based on a centrally imposed algorithm. It should be noted that an individual NDP might retain, as ours did, wholly relevant policies which were in themselves perfectly up-to-date, whilst the LPA plan itself might have been ill-judged and difficult to deliver. This arguably might be the case in Herefordshire, where over-ambitious housing targets were set, with too great a proportion of the target being allocated to rural locations which were unsuitable by reason of isolation, sensitivity or inadequate facilities and services.

Networking across parish councils suggests that this aspect of the 2019 version of the *NPPF* generated widespread and persisting resentment among those who had given much time and effort to producing an NDP. It suggested that the government's advocacy of partnership planning in the Localism Act was disingenuous, a suspicion emphasized by the almost complete absence of reference to neighbourhood planning in the *Planning for the Future* white paper.

# Current Core Strategy settlement hierarchy

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

The effects of the rural settlement hierarchy as modified in the 2015 Core Strategy have in our view been highly unsatisfactory for the parish of Kings Caple, encouraging development of a type for which the village is unsuitable because of its landscape sensitivity, relative isolation and lack of resources and services

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

The development of the rural settlement hierarchy which underpins the 2015 core strategy can be tracked through two documents, the *Rural Settlement Hierarchy Background Paper* (2010) and the *Rural Housing Background Paper* (2013).

The first of these contains an attempt to categorize rural settlements and appears to be moving towards a preferred option which would develop and make more sophisticated the type of approach adopted in the UDP (as noted above). Market housing is seen as needing to be concentrated in settlements possessing a minimum of four out of six identified key facilities as well as enjoying good public transport (at least a daily peak time service to at least one town). The UDP had identified 45 main villages in a county containing 233 parishes. The *RSHBP*, had this approach been developed, might, with its attempted definition of Tier 2 settlements, have increased this number, though not substantially.

The *RSHBP* also provided a comprehensive list of settlements, noting the number of dwellings in each, as well as attempting to list all its facilities. The facilities were allocated individual scores so that a total numerical figure could be gendered in each case to rank settlements. Two constraints were also noted – liability to flooding and location within an AONB – but these were not allocated scores.

This part of the exercise was much more questionable. There were serious anomalies and inconsistencies for a number of reasons. There was an evident difficulty in working out the methodology, arising from the confusion between the terms 'settlement', 'parish' and 'village'. Parishes are the basic units for planning purposes. However, it is difficult to achieve accurate ranking by size when, though some parishes have their development concentrated in a single substantial nucleated centre, others, particularly in the areas of original Celtic settlement in the south and west of the county, contain a number of scattered hamlets, each centred on one or two farms; other settlements have continued to develop through history in a variety of divergent ways; there are parishes where most of the existing housing is scattered in a diffuse pattern over a wide area because of squatters' settlement on common land in the 16<sup>th</sup> and 17<sup>th</sup> centuries; other settlement concentrations have arisen because of economic diversification. Consequently, the sizes attributed to settlements by number of dwellings in appendix 6 of *RSHBP* are often misleading because of the lack of consistent criteria in defining what is referred to in appendix 6 as the 'main village envelope'.

There are also a range of problems arising in both the criteria used to score facilities and the accuracy of the scores allocated. For example, there appear to be two different methods of calculating a score for the public transport available to a settlement; in the case of Kings Caple neither method was correctly applied. Only one score was available to indicate the presence of a village hall, though in reality these are of widely differing sizes and use to communities, varying from relatively modest meeting rooms to sophisticated events venues. There was also no apparent scoring to take account of the adequacy of the road network serving a settlement. Furthermore, if the aggregated scores were intended to be a determining factor in assessing settlements for their suitability for market housing development, there should have been a negative scoring factor where settlements lay wholly or largely within an AONB or had substantial areas liable to flooding.

But all these problems were massively compounded by the publication of *RHBP*. Essentially this replaced the presence of a range of key facilities as the factor determining which villages were suitable for development and replaced it with a simple estimate of relative size, measured by the number of dwellings as listed in appendix 6 of *RSHBP*. The settlements in each rural housing market area were then arranged in order of size, and any settlement at or above the median list figure was then selected for the allocation of a

substantial quota of market housing. Facilities scores were recorded but only used where they could justify the inclusion of a below median settlement. No account was taken of the AONB and flooding constraints.

This substitution of an emerging methodology based on objective analysis by one dependent on a crude and inappropriate number series algorithm was an egregious failure of policy. As demonstrated above, the methodology for determining the identification and size of settlements in *RSHBP* was flawed and the results misleading. Moreover, perusal of the settlement lists for the different rural HMAs suggests that the median point of the list as the determining point was in any case set far too high; the top quartile of the list might have been more appropriate, but such a change would have been ineffective unless accompanied and modified by a robust audit of services and facilities.

The defects of the list of services and facilities in *RSHBP* has already been discussed; by 2013, the list was obviously out-of-date, and even more so by 2015 when the core strategy was examined and adopted. No attempt appears to have been made to update it, and at the examination hearing a former parish clerk said that the original list had been the result of a desk-based study, and all the papers had been lost.

These facts sufficiently explain why for many smaller villages in Herefordshire the developments that the rural settlement hierarchy has often been used to justify cannot be described as sustainable in any meaningful definition of the word. The principle of progressive sustainability has, as many predicted, proved to be entirely illusory.

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

There have been no new services or facilities.

The daily direct bus service from Hereford to Ross, (including peak-time buses) through the neighbouring settlement of Hoarwithy has been discontinued following the withdrawal of subsidy by Herefordshire Council.

Between 2008 and 2016, Herefordshire Council made three attempts to close the village primary school. It is now a part of multi-academy trust independent of the local authority following a decision by the governors.

The only feasible major access route into the area within the village's designate settlement boundary is an unclassified road which is not properly maintained by the Council and is in a deteriorating condition. 2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

The **minimum** services and facilities to support proportional growth in rural settlements are as follows

Daily bus service at peak times through the area of the settlement boundary, or contiguous to it, or within 0.5 km of it.

Access to and travel through the settlement on a properly maintained classified road.

Village hall large enough for social events such as lectures and the preparation and service of food.

At least two of the following: shop, public house, post office, primary school.

Proportional development should not be permitted

where the settlement or parish is largely dispersed and no main settlement envelope of adequate size can be identified; in such settlements only RA3 open countryside development can be permitted in order to avoid the danger of opportunistic commercial property development;

where access into and travel through the area of the settlement is wholly on unclassified roads.

In addition, account should be taken of flood risk and AONB status, which might in some settlement severely restrict or even preclude proportional development. Any development should scrupulously take account of protected sites.

# A possible new major settlement outside Hereford and the market towns

If this were to be considered it would need to very carefully considered and conform to the following additional parameters **as a minimum** 

an 'A' or 'B' classified road passing through or immediately contiguous to the area within the settlement boundary;

a daily on and off-peak bus service to at least two urban centres;

a passenger railway line passing within or immediately contiguous to the area within the settlement boundary;

a primary school;

a primary care health facility;

at least two non-agricultural employment sites;

a social centre for meetings and recreation;

a sports field;

at least one of each of the following: retail shop, post office, public house, garage/filling station/high-capacity re-charging centre.

Any plan for such a new settlement to be the subject of a rigorous prior landscape impact assessment.

All development of centres for proportional development outside Hereford and the market towns to be subjected to a rigorous prior assessment to ensure compliance with the principles of paragraph 8 of the NPPF.

### Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

The whole parish is located in the Wye Valley AONB. It is bounded on three sides by the River Wye, and much of it is prominently visible from surrounding areas on the other side of the river.

Only two of the 146 dwellings are liable to occasional flooding from the Wye itself, though a substantial area of water-meadows is regularly flooded. The absence of major streams and a multiplicity of springs around the central settlement cause frequent problems of runoff and road degradation.

The highways network in the village is inadequate. The roads into the area of main settlement are unclassified, narrow, substandard and poorly maintained.

The provision of services and facilities does not meet, and is never likely to meet, the standard required to conform to the objectives set out in para 8 of the NPPF.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

No. Reasons detailed above.

Thank you for taking the time to complete this survey.

### Herefordshire Local Plan update - pre-consultation survey

### General Questions

What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

### Not successful:

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

- Policy RA2 aimed to support proportionate housing development in the rural areas where residential development would be located within or adjacent to the main built-up area(s) of the settlement. This was to ensure that unnecessary isolated, non-characteristic and discordant dwellings did not arise which would adversely affect the character and setting of a settlement and its local environment
- Given the importance of the Herefordshire landscape, new dwellings should make a positive contribution to their rural landscape by being built to a high standard, incorporating appropriate materials and landscaping. The examples of new housing development in Kingsland can barely comply with these requirements. Three large developments – Hamlyn Place, Boarsfield extension and opposite Luctonians – are examples of indifferent development with little reference to their setting or the characteristics of the village or the rural landscape.
- The policy required that new development should provide an appropriate mix of dwelling types and sizes, which from our experience, it hasn't.
- This policy failed the county firstly by the allocation of significant numbers of new housing to settlements outside the main towns. Many of the settlements are unsustainably located and most are absent of facilities and services to support increased growth. Most rural settlements are only accessible by car. The CS sought the extension of these places with the optimism that the growth would generate growth in other areas such as the provision of employment and public transport. This has not happened, and many settlements are actually worse off through further cuts to public transport.
- This policy also failed by placing reliance on NDPs to be the principal mechanism for allocating new rural housing. Policy RA2 provided a "free for all" "smash and grab" time for developers. This was particularly harmful to our rural county. Volunteers scrabbled to save their parishes from inappropriate development NDPs took too long and were completely dependent on volunteers within the community who spent a vast amount of time writing plans that were rarely in place in time to allow for the growth that reflected the community's wishes. Housing allocations should be reflective of a council led consultation. As more people are familiar with planning, there would likely be more interest in a county-wide consultation which would result in a development plan with clear allocation policies in a similar form to Shropshire Council's CS.
- There seems to be no mechanism to make developers use brownfield sites first and so almost all applications are for agricultural land sites.

Policy RA6 – Rural economy

- Policy RA6 has had a significantly detrimental effect on the rural county particularly with regard to the impact of some agricultural practices. The county has been swamped with poultry sheds, which are not of an appropriate scale nor do they support the rural economy. The cumulative effect of this business in our rural county has devastated our natural resources, negatively impacted upon our beautiful landscape, generated significant traffic movements with lorries in local narrow roads where they represent a highway safety issue and caused unacceptable adverse impacts to the amenity of those who live nearby. Such development and its impacts will negatively affect tourism which is significantly important to the county and promoted consistently through the CS. Overall, Policy RA6 may have enabled small local businesses to start-up and expand, but the damage caused by some large scale agricultural ventures has not conserved or enhanced the county.
- Overall, the current level, types and characteristics of development in the parish are failing to meet the CS Objectives: -
- Social progress 1,2 4 and 5
- The vision for social progress in rural areas is not being adhered to. We are an increasingly middle-class village with a preponderance of retirees. There are too few affordable homes for younger families or for residents wishing to downsize.
- Economic prosperity 8
- Environment Quality 10, 11 and 12

What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

- Policy RA2 Complete re-write with an emphasis for sustainable development directed towards the main towns. The rural distinctiveness of Herefordshire as a county is being destroyed by over development in the rural parishes. Canon Pyon is a prime example of excessive urban development that has irrevocably damaged the rural nature of the village. The CS intention to increase community facilities and necessary infrastructure to support social progress has not been realised in Kingsland Parish. The significant increase in residents has led to parking issues with the village centre reduced to one lane for much of the day. This impacts negatively on air quality and the general amenity of the residents, as well as diminishing the traditional rural character of the village particularly within the conservation area. Furthermore, the unbalanced growth has produced an increasingly urbanised environment which is detrimental to the rural landscape and will impact upon the enjoyment of the area for residents and visitors.
- Policy LD1 Landscape and townscape is positively worded and provides a sound basis on which development should either be supported or turned down. It enables development proposals to protect and enhance their settings. However, it has often been glossed over where it could have provided a sound basis to refuse applications which are not appropriate to their setting. The policy needs strengthening so that the decision makers have the conviction to rely on it.
- Policy LD4 Historic environment and heritage assets is not in accordance with the NPPF and does not set out the statutory duty to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Nevertheless, the policy needs strengthening, and the CS as a whole should place greater emphasis on preserving or enhancing the character or

appearance of our heritage assets. The policy requirement should also look at the importance of protecting those areas that adjoin conservation areas. Examples of new development within the county which has no regard to the existing historic settlement are prevalent in the county.

- Affordable Housing The CS has failed to deliver affordable housing in areas where it is most needed. The cost of housing in the county has risen whilst the average salary remains low due to the nature of employment and lack of job opportunities. Developers have avoided the requirement to provide AH by deliberately applying for permission for 10 or fewer. This also applies to the mix and type of housing in the rural areas. Development in Kingsland demanded substantially above the average price for the houses built during the plan period. This is a barrier to most young families and provides an unbalanced aged population.
- Policy SS2 Delivering new homes rural character and landscape needs to be strengthened. Large poorly designed developments in rural villages/areas are negatively affecting the rural character and associated landscape of villages and settlements. Too many homes are being put in rural villages vs the identified main market towns and Hereford which have access to employment, transport, services etc. The balance needs to change to ensure Herefordshire continues to be a rural versus an urbanised county and that all development is sustainable.
- Policy SS3 Ensuring sufficient housing land delivery Until recently HC has failed in delivering land supply which has meant unsustainable and inappropriate developments are being put in places that conflict with Neighbourhood Plans and the Core Strategy
- Policy SS4 Movement and transportation the Transport Policy needs urgent review in light of government policy on diesel/petrol cars and electric cars, particularly in relation to rural areas. Housing is being built in rural parishes where there is little or no access to public transport (which has declined versus been improved), hence putting more versus less cars on the inadequate roads infrastructure and encouraged out-commuting. Travel distances involved means that walking/cycling alternatives are not possible or impractical.
- Policy SS6 Environmental quality and local distinctiveness this policy is too weak and needs a complete review. Housing and business developments seem to take little account of many of these issues. For example the excessive phosphate pollution of the Lugg and Wye from excessive chicken shed **approvals is a major issue. The policy element 'physical resources, including** minerals, soils, management of waste, the water environment, renewable **energy and energy conservation' ne**eds greater emphasis and more specific detail.
- Policy SS7- Addressing climate change needs a complete review and strengthening with regard to the current issues of climate change.
- Policy SD1-2 Sustainable design and energy efficiency requirements not forceful enough Needs more strength in mitigating climate change at all levels as it currently does not meet the challenge of climate change effectively. Should be mandatory (not 'where appropriate') for all new development to be sustainable re Climate change e.g. mandatory for all new builds to be provably carbon neutral, to only have ground/air heat source pumps; solar panels or other renewables for heating/hot water. Electric car chargers for each property. Sufficient space for e.g. multiple recycling bins especially in light of the new refuse strategy.
- Policy SD3 Managing water Run off and surface flooding has increased as a result of densely packed new builds with limited attention to hard surface permeability. Culverts, ditches and sewerage pipes have not been enlarged.

No commensurate improvements in sewerage capacity. Response to flood mitigation and sustainable drainage improvements not apparent

• Policy SD4 Wastewater treatment and river water quality - Epic fail

Are there any key planning policies that are missing from the current plan?

- Protection of the River Lugg and River Arrow In the light of the pollution and phosphates issue in the Wye and Lugg catchments a more specific policy is needed. In particular, new housing should not be connected to local sewage works without phosphate stripping.
- Strong design guidance
- The CS is a strategic plan and there is nothing in place, apart from NDPs, to guide development. From examples of some new rural development, it appears that numbers have been more important than quality. With the **emphasis in the NPPF placed firmly on "building beautiful", this is an element** that should have strong policy guidance.
- Is there a supplementary planning document on this extremely important topic?
- Large rural development Strategic policies for large rural development for development such as poultry units and renewable energy. These have huge impacts on the landscape, highways, air soil and water quality. These types of development require careful planning and there should be specific policies to manage them.

Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

• It seems that the only policy areas devolved to Neighbourhood Development plans are for residential development

If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

- In part.
- It has not been a success in providing commensurate facilities to support such housing or to support the overall vision for and eclectic mix of housing designed to fit within the whole landscape.
- Design guidance in the NDP has been largely ignored and the result is development lacking empathy to the surrounding built environment and landscape.
- Continuous lack of HLS within the county has allowed forms of development within the settlement that is not supported in the NDP, often with substantial negative impacts on the rural landscape.
- The NDP has been a useful tool when required by the Council to support its refusal of proposals but discarded when it doesn't suit.
- Affordable housing of the 87 houses approved until May 21 only 11 are classified as affordable housing. Developers are continually allowed to build larger properties. More specific allocations of affordable housing and a higher % allocation in developments so that local people can stay in the parish/village are needed. Developments of 5-10 properties should also include a proportion of affordable housing.

Current Core Strategy settlement hierarchy

What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

- Good for the shop/post office, pubs and local garage and more volunteers for village organisations enhancing the sense of community
- Urbanisation of Kingsland through a significant increase in the number of residents. This has led to substantially more traffic through the long narrow roads through the village with increased highway safety issues outside the school, by the Post Office and around the junction with the surgery.
- Negative impact due to the design and size of most of the new housing development – detracting from the historic core of the village and destroying the pattern of the built environment.
- Constant threat from speculative development proposals that show little respect to our environment. Policy RA2 allowed for this brutalist approach to providing often inappropriate housing in a county with insufficient infrastructure and employment to fully support such expansion to its rural settlements.
- Question why Shirlheath and Cobnash were designated as a main settlement for development when they are basically an isolated collection of houses with no services or facilities (Ack that Shirlheath does have employment). The presence of facilities and services for the whole community to use should carry more weight than presence of an employer.

Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

- In principle maybe but the reality is that some parishes like Kingsland have gone above and beyond and are taking far more development than some other parishes that have built little.
- Where housing has been delivered in RA2 settlements, it has often not reflected its surroundings and has been of little architectural merit, failing to provide for local needs.
- Kingsland has exceeded the required number of new dwellings rapidly without a sufficiently holistic approach to permissions. The desirability for developers of house prices in Kingsland means that we have a constant stream of applications with little protection regarding speed of growth.
- Very limited social and affordable housing as this requirement is circumnavigated via multiple small developments.
- The subsequent growth of traffic in the village has made parking and driving very difficult.
- A large increase in hard standing with the new development
- Many hedges grubbed up and trees felled.
- No requirements for sustainable energy generation.
- Existing Doctors' surgery overwhelmed with huge increase in patients
- Associated environmental impact of a large increase in dog ownership with reduced space for their exercise.
- Sewerage backup, overflow and regular flooding insufficient capacity and infrastructure
- There needs to be equality with regard to actual development across the parishes/hubs identified for development. A maximum % as well as a minimum should be specified to encourage more even development across

parishes and the county if the current strategy for housing is taken forward. Kingsland Parish has had around a 20% increase in dwellings between 2011 and May 21 with further large developments seeking approval/on appeal. This level of development is unsustainable and is not proportional growth.

### Services and facilities

Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

- The PO with shop & tearoom remains open and well-used and we have 2 wellused pubs
- The tennis courts have been resurfaced and KMGT has benefitted from s106 monies.
- There has been very little improvement in services or infrastructure i.e. sewerage, parking, public transport
- The system for developer contributions on this level does not benefit rural areas.
- Of the 28 applications for 87 new houses approved from 2011 until May 21, only 2 developments for 28 houses total have made any S106 contribution.

What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

- Increase off road parking facilities for vehicles servicing a larger population, school run, doctor's surgery, visitors etc.
- Secure a field for increased number of dogs to exercise to reduce environmental problems with dog excrement in the street, community green space and farmland
- Upgrade drainage, ditch system and land management to reduce flooding
- Look at individual planning applications in the context of the pattern of recent growth and housing type, impact on tourism and sustainability issues.
- Public transport, schools/nursery, GPs, Dental services, employment opportunities, affordable housing, community hubs (halls, pubs etc), small affordable work units, local markets promoting local food and drink.
- Much improved public transport its inadequacy means local development is car reliant as new residents primarily have to go to Leominster/Ludlow or elsewhere for employment, education or services.
- The village primary school is too small to support more children/growth
- The surgery is too small with inadequate car parking for appointments

### Future settlement hierarchy

Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

- Insufficient facilities to accommodate the growth in population
- As an attractive medieval village settlement with a scheduled ancient monument castle site, magnificent medieval church, ancient public houses and open countryside, the potential for tourism has not been sufficiently considered when enabling this rapid growth of population, dwellings and traffic management.
- The increase in housing numbers has already taken good quality agricultural land on the periphery of Kingsland and has started to erode the historic

settlement pattern which is predominantly linear. Further substantial development on top of what has already been experienced will likely be detrimental to the rural character of the parish turning it into a suburb of Leominster. Furthermore, the parish is in a high quality rural landscape with many heritage assets and biodiversity. Additional unrestricted rapid growth as we have experienced since the adoption of the CS would significantly harm the parish.

 Kingsland – Conservation Area – the parish has built well beyond the minimum 14% and space within the village is now very limited. We have been positive to development but seem to be penalised for being so by more development being approved and applied for. This is at odds with the principles of a Neighbourhood Plan

Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

- No longer. Growth has been rapid and without sufficient infrastructure
- The settlement has experienced significant rapid growth to the detriment of the area. The purpose of the NDP was to support smaller more organic growth that was appropriate to its setting.
- The amount of housing built is already putting pressure on infrastructure and services/facilities in the parish. This should be taken into account when reviewing the CS.
- There is little land left within the KNDP settlement boundaries and more growth would inevitably lead to urban creep into productive agricultural land surrounding Kingsland which would damage the rural landscape and character of the village and parish.
- Market towns and Hereford with the facilities, services and infrastructure as well as easy access to employment, public transport and essential day to day needs such as supermarkets should be the focus for future development, with the emphasis on brownfield sites in preference to productive agricultural land.
  - Thank you for taking the time to complete this survey.

# Neighbourhood Planning Team

From:	Lisa Lewis <clerk.ktgpc@hotmail.com></clerk.ktgpc@hotmail.com>
Sent:	14 January 2022 07:44
To:	Neighbourhood Planning Team
Subject:	RE: Herefordshire Local Plan update – pre-consultation engagement reminder
Categories:	Blue Category

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 Neighbourhood Planning Team

I can confirm that Kingstone & Thruxton Group Parish Council discussed their response to the survey at a recent Parish Council meeting and it was confirmed that there were no comments to make at this time.

Kind regards,

### Lisa Lewis

Kingstone & Thruxton Group Parish Clerk

# Herefordshire Local Plan update – pre-consultation survey

### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider have been successful or not? Please explain the reasons for your answer.

A wide ranging question. The following response relates specifically to the effective of the linkages between the Country's overarching document and the Neighbourhood Plan policies in principle and practice. If the proposals in the Planning White Paper are enacted this will become a central issue both because democratic and community involvement will be focussed on initial zonation decisions rather than on overview of individual planning proposals. In relation to this the specific Corporate Plan Policies for Kington were rudimentary and the decision by the County to double the housing allocations from 100 to 200 without any clear policy justification or policies for resource allocation for employment and service needs was one factor in the NDP failure at the Referendum.

If the NDPs are to remain a central component in the Planning system (as suggested by the White Paper) this will argue commitment of county budgets and staff resources to much closer policy development structures between the Town and Parish Councils in designing detailed zonation policies and their implementation.

In addition the clear need for climate change mitigation will argue for these policies to be the central focus of the overall county planning policies and their application at local level.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

The climate change policies in the Corporate Plan appear somewhat as an afterthought. Not surprisingly given growing concerns about CC, the County's 2020-24 operational Plan and the 2020-22 County Delivery Plan gives more centrality to Climate Change and provides evidence of the level of mitigation achieved. In the new Corporate Plan a strong case could be made for making CC mitigation the foundation for all Planning policies and that this should be reflected as the basis for the more localised guidance as the NDP's are reviewed. If the White Paper proposals are adopted this should underpin the zonation structures agreed.

3. Are there any key planning policies that are missing from the current plan?

See above

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reasons for your answer.

This depends on the final decisions central government makes on a new planning regime. If the proposed zonation structures are adopted with the concomitant decrease in democratic overview very detailed assessment will be needed to establish zonation boundaries that properly protect landscape, guarantee high architectural and sustainable development fully climate change mitigation proofed. This will require very detailed policy and implementation strategies at local level and will argue for a much closer working partnership between county and parish.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

The NDP failed at referendum. The housing allocation largely explained this. Nevertheless the draft document was of high quality and benefitted from considerable high quality consultancy support and the knowledge and expertise of those involved at the local level. It is clear that similar high quality plans have been prepared by other NDP groups. Whatever the final central government decisions are on a new planning structure, the County should assess how partnership between their staff and local expertise and commitment can be fully harnessed.

# Level of growth

1. Do you consider that the current housing targets for the city or town have helped to sustain its role as a service centre? Please explain the reasons for your answer.

These matters were never properly considered by the County in doubling the housing allocation to Kington. The allocation, if achieved, would increase the population by 25-30%. No proper consideration was given at county level to employment and service needs that this level would generate.

2. What would you consider is required to improve or maintain its viability? Please explain the reasons for your answer.

We will need a much more detailed assessment of employment and service needs related to guarantee resources commitment.

3. Are there any constraints to new development in or around the city or town that would affect its ability to sustain future growth? Please explain the reasons for your answer.

Whether and to what extent central government adopt the zonation proposals in the White Paper, future development of Kington will require a more detailed assessment of landscape both within and around Kington. Proposals have already been made for an AONB to be designated adjacent to Kington and the Arrow river corridor through the town needs to be better integrated within the conservation area. This raises wider issues for the county as a whole and will need to be assessed by the county in preparing its new strategic planning policies.

Thank you for taking the time to complete this survey.



### Herefordshire Local Plan update – pre-consultation survey

#### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider have been successful or not? Please explain the reasons for your answer.

LO1Green infrastructure and corridors and the landscaping of new sites, keeping existing trees and hedgerows generally works well but not enforced when removed. LANP 7 LO3 LO1 SUE – Not yet developed1500 homes More dispersed housing as identified earlier this year. Employment land hasn't worked with up to 10 hectares not used. Air quality – development doesn't take into account adding to issues. No. E5 Use of upper floors needs supporting statement p138 No. NT1 Development should show that the local highways can absorb the traffic.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

Water and climate polices need to be strengthened and adhered to. Surface water dispersal – No development should allow surface water into the sewerage system. SD2&3 There is no evidence of this being followed. Permeable parking provision should be made. E5 Town Centre needs to be rethought with sustainable design.

3. Are there any key planning policies that are missing from the current plan?

Intensive livestock units. The supplementary planning document needs to take into account the cumulative impact and every application requires a manure management plan.

SD1 Needs a policy to take into account the climate and ecological emergency. The public transport policy needs to be linked with climate change.

A specific tree policy is required as is a specific hedgerow policy.

A new waste policy is required.

- - 4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reasons for your answer.

Unsure which policy areas are devolved to the NDP or Leominster Town Council.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

A partial success but the aims and objectives are not taken into account. The development of the town centre is not considered in the whole. Spaces above shops are being developed into extremely small 2 bed flats.

LO1&2 have not happened for the reasons in question 1.

# Level of growth

1. Do you consider that the current housing targets for the city or town have helped to sustain its role as a service centre? Please explain the reasons for your answer.

This is irrelevant as growth hasn't happened. Developments in the pipeline and development targets need to be revisited as they were set some time ago.

2. What would you consider is required to improve or maintain its viability? Please explain the reasons for your answer.

Better highway infrastructure More community buildings A holistic town centre plan of retail, residential and leisure An air quality zone especially in Corn Square as vehicles queue for a parking space

3. Are there any constraints to new development in or around the city or town that would affect its ability to sustain future growth? Please explain the reasons for your answer.

Surrounding flood plains as the town is in between 3 rivers. LO1&2 are optimistic. Air quality. Needs a realistic and achievable plan for Leominster.

Thank you for taking the time to complete this survey.

# Comments from LINTON PARISH COUNCIL (Jan 2022)

# Herefordshire Local Plan update – pre-consultation survey

### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

The rural areas have delivered well in excess of the proportion of new housing envisaged in the Core Strategy. The target was 32% and as at April 2021 the proportion of commitments coming from Rural areas was 45%, these 13 percentage points representing a 40% excess above the core strategy plan percentage. This is a massive issue in terms of the preservation of the character of small villages and the rural landscape in Herefordshire. In addition many of these sites are not at all sustainable (services offered by settlements were not considered in the previous settlement hierarchy) and so settlements such as Bromsash which have no facilities, no pavements have had circa 15 houses built, yet only approximately 7 years ago a single dwelling was rejected as it was deemed that this settlement was completely unsustainable for future development.

The change of designation to being a sustainable settlement in the core strategy without considering the local details was a fundamental flaw in the Core strategy and needs to rectified in the updated plan – it has led to a significant increase in traffic along narrow country roads and most importantly this development has contributed to further carbon emmissions through this transport.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

RA2 places a minimum growth target without any upper cap. The housing growth for Linton Parish now far exceeds the minimum growth target (10 years earlier than the 2031 end date for the Core Strategy) but the absence of a cap has frequently been used as a justification for further development in planning applications. Additionally, the housing development has consisted almost entirely of 4 bedroom + executive style houses. This is not consistent with the Local Housing Market Assessment which identified a need for smaller properties.

SS7 calls for development which minimises demand for car usage. However, two of the settlement areas in the Parish are not served by public transport at all and the third has only an infrequent (2 hourly) bus service. Car usage has therefore significantly increased in the parish.

SS7 also calls for eco friendly developments. However, in practice, few measures have actually been implemented in the delivered houses.

# 3. Are there any key planning policies that are missing from the current plan?

Topography of the land and soil movement should be considered on individual development plots. We have seen several plots developed where 50 - 100 tonnes or more of soil is dug out of the hillside. Not only is this damaging to the local ecosystem, but it also reduces the water retention in the landscape and means there are numerous very heavy vehicle movements in the area which have caused damage to roads. The developer ends up passing this cost to the council and tax payers.

- 4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.
- 5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

It's early days, but a concern is that the plan may be short-lived if Herefordshire falls below a 5 year housing supply.

Unfortunately as the NDP takes about 2-3 years from inception to delivery, many sites are accelerated by landowners and get put forwards and approved due to the presumption in favour of "sustainable" development and so much of the damage is done before the plan has legal weight.

# **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

I cannot find the term 'settlement hierarchy' in the Core Strategy so I don't understand the question.

However see our response to question 1 above.

Also: We have 3 very different settlements in the parish, it did not seem right that they were all classified the same. More granularty is required

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

For the reasons stated above, the aims of policy RA2 have completely failed for Linton Parish which has suffered large scale, unsustainable development.

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

No new services have been provided.

There have been several developments of 9 houses including some by the same developer on adjacent sites. The current policy for s 106 contributions does not work for us. It should be on smaller sites of say 3 or more houses. The result of the current poicy is that we have had significant housing growth and zero s106 contributions and so there have been no improvements in local infrastructure to cope with this growth.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

We have had almost double the "proportionat growth", so we need to play catch up on service provision which would include highway safety improvements (e.g. 30mph through Gorsley) and traffic calming measures in both Gorsley and Bromsash. As well as improved bus service from Gorsley.

Unfortunately additional services in Bromsash and Linton are going to be impractical due to the small scale of these settlements and local topography.

# Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Further growth is not possible without changing the current rural nature of the parish. Gorsley has absorbed a lot of new housing and any more will destroy what is left of the rural aspect of the village. Further development in Linton and Bromsash are limited by local topography and unsustainability of these locations. 2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

#### No

Gorsley is the only village with any services but the School is already oversubscribed, bus service to infrequent to be of use. Other than a small community shop & Café then access to all other facilities will require use of a Car, hence the large increase in cars we have seen on the roads in the village following the recent expansion in housing in the village.

Bromsash has no facilities and no pavements for safe walking. Linton has a pub and village hall and also no pavements for walking

It is approximately a mile between each of these settlements and so a car is required for residents of Bromsash or Linton to access the limited services in Gorsley

Thank you for taking the time to complete this survey.



### Herefordshire Local Plan update – pre-consultation survey

### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

It is considered that the Little Birch area does not have the infrastructure to support the additional housing that the core strategy required, and should not be designated as an RA2 area. This has resulted in additional traffic movements to reach the nearest facilities.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

Provision of broadband to rural areas. There are parts of the village which are very poorly served. This became more evident during the covid pandemic where residents became more and more reliant on internet access.

3. Are there any key planning policies that are missing from the current plan?

There is always a lack infrastructure built into new developments as they go forward. Unknown.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

Unknown

- 5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.
- 1. The NDP has met the provision of housing, but this has failed to allocate smaller lower cost housing. In addition, the lack of a defined settlement boundary has resulted in piecemeal development away from the main settlement.
- 2. Broadband. Whilst newer developments are being provided with the necessary access to the broadband, this has had no benefit to the existing community placing it at substantial disadvantage.

### **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

The designation of Little Birch as an RA2 area is considered misplaced and has resulted in additional development whilst there has been no improvement in infrastructure and facilities. Ie, removal of village bus service, no access to public transport after 7.30pm, closure of The Castle Inn.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

Para 1 of the current core strategy above refers.

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

No

There have been no new improvements or facilities in the Parish.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

Reliable bus service.

#### Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Lack of infrastructure. As above

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

No as mentioned above.

Thank you for taking the time to complete this survey.



### Herefordshire Local Plan update – pre-consultation survey

#### General Questions

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

### LLANGARRON PARISH REPLY

The strategy has resulted in Llangarron Parish being well over the minimum target for housing development by 2031, (target 64 houses, 105 granted permission at the last count). In this respect it has not been successful as this level of development is unsustainable, see comments below.

The strategy has also not been clear enough on environmental and sustainability issues, with the National Planning Inspectorate refusing planning applications in this Parish partly on these grounds where Herefordshire Council planning officers had initially recommended approval for those schemes.

There needs to be a clearer commitment to protection of water courses and prevention of any development which contributes to flooding and pollution risk.

Flood risk maps are out of date for our Parish. Also flooding and pollution risks from surface run off in areas with land steeply running down to water courses does not seem to be taken into account.

Natural England / The Environment Agency frequently warn of the poor water quality in The Garron and Gamber which run through our Parish, yet Herefordshire Council officers do not seem to take account of this freely available data.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

The application of policies should be consistent. It is not always clear why some applications gain approval where other similar schemes do not.

There must be confidence that due weight will be given to Neighbourhood Development Plans. A recent case at Welsh Newton Common, (not our Parish), caused concern in many Parishes. Herefordshire Council has declared a climate emergency since the Core Strategy was drawn up. It is therefore hoped that an updated strategy will give proper consideration to environmental and sustainability concerns.

These should discourage further development in unsustainable areas which will increase reliance on private cars and delivery vans, provide protection for established hedgerows and woods/orchards, (currently planting new hedges which often fail is often seen as an acceptable environmental mediation) and provide protection for river Wye tributaries against further run off or failed soakaway pollution.

3. Are there any key planning policies that are missing from the current plan?

More specific policies to complement the Council's declaration of a climate emergency are needed. As mentioned above, development should where possible be located close to amenities and/or reliable public transport.

Also, clearer environmental protections are needed as mentioned above.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

More devolved wording on environmental and sustainability issues pertinent to local areas might be useful as local people are aware of the local issues. It would be good to see planning officers requesting more respect for local building materials and building styles from developers as distinct local character is being compromised in many villages. 5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

N/A, our NDP is just about to go to referendum.

# **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

As a Parish we are already around 70% over our minimum housing build quota to 2031. It seems that many parishes/areas are well under quota. We are constantly told that the quota in a minimum, but that means that more needs to be done to protect small settlements with poor infrastructure and very few facilities.

Hopefully having an adopted NDP will help. Many people wanting to 'escape to the country' want to live in Parishes like ours. This has resulted in 105 new houses being granted permission, nearly all of them 'executive' 4+ bedroomed houses. These have nearly all attracted buyers from outside Herefordshire, so not meeting any local need. The strategy should include more to encourage affordable and starter homes in sustainable areas with public transport links, access to health facilities schools and shops and work opportunities.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

No, in our area there has been over-development given our lack of infrastructure, (poor roads, a weekly bus service and no mains drainage in all but one settlement). Also, we have no shops or medical facilities in the Parish meaning that daily use of private cars and delivery vans are a fact of life.

There are also very few local jobs so most people commute considerable distances. Improvements to broadband are essential and we would hope to see a commitment to the completion of the broadband project to facilitate home-working.

As mentioned above, the National Planning Inspectorate has considered that applications in Llangarron and Llangrove were unsustainable due to lack of facilities and reliance on the private car.

We would certainly expect not to be allocated a further housing quota given the high housing growth numbers relative to settlement size and sustainability issues of the Parish thus far.

Rural sustainability would require frequent reliable public transport, proximity to general public services which can be accessed on foot/ bicycle or by public transport, mains drainage and shops catering to basic needs. We have none of these in the Parish, (apart from mains drainage in the largest village), so perhaps the strategy should take more account of the sustainability gap between larger villages which have these key facilities and services and much smaller ones.

# Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

No new services have been added. There is increased pressure on the poor road network and on the mains drainage in Llangrove, the only village with this facility. There have been no facilities retained as a result of development as there were very few facilities in the first place. Very few primary aged children have joined Llangrove Academy as the result of development. Most new houses are 'executive' style attracting older individuals with no school aged children. 2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

As a Parish we have already accepted more than our share of proportional growth. The Parish is made up of four settlements. Llangrove, the largest, has a primary school and pub but very poor roads. Road improvements would be very difficult to attempt as houses abut the roads on both sides in many areas. The other settlements, Llangarron, Llancloudy and Three Ashes, are very small with no facilities apart from a church and village hall in Llangarron and a Chapel in Llancloudy. All have poor road networks and a weekly bus service apart from Llancloudy which is located on the A466. In the case of Llancloudy, further development raises questions of road and pedestrian safety as there are no pavements.

In these circumstances, any key facilities and services would be very expensive to instal, out of proportion to the sizes of the settlements and would cause unacceptable damage the rural character of the area. It is hard to imagine any key services being added in our Parish as it would not be cost effective given the small size of settlements and other barriers. Local people access such services and facilities at Ross on Wye, about 5 miles away. As mentioned we do not even have a shop.

### Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Yes, see points above. 1. Already 70% over minimum housing quota to 2031 2. Three settlements have no mains drainage

3. Poor roads with difficulties in making improvements due to location of existing dwellings

4. Potential impact on Garron and Gamber, tributaries of the wye, especially in areas with no mains drainage

5. No shop or medical facilities in the Parish. Other facilities limited. Llangrove has a pub and school plus church and village hall. Llangarron has a church and village hall, Llancloudy has a chapel, Three Ashes has nothing.

6. Weekly bus service only in two settlements, (Llangrove, Llangarron) no bus in one settlement, (Three Ashes), the other settlement, Llancloudy, in located on the A466 with road safety problems and no facilities apart from a chapel

7. Flooding issues, for example the centre of Llangarron is completely unpassable in times of flood

8. Many sensitive landscapes due to the topography of the land

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

No, we have already accepted a disproportionate amount of growth relative to the size of the settlements and the minimum quota by 2031 set by Herefordshire Council. The Parish is made up of small rural villages with very limited facilities and services as explained above. More development would be unsustainable as creation of additional facilities and services needed to facilitate sustainability would not be cost effective and would be disproportionate to the size of the settlements.

Thank you for taking the time to complete this survey.



### Herefordshire Local Plan update – pre-consultation survey

#### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

Policy SS6 local distinctiveness

The SAM in our parish and local distinctiveness, must be protected from inappropriate development. Ie amount of housing locally ,style of housing and density of housing. This is currently being challenged.

Policy SS7 climate change

The increased amount of private car traffic goes against this The provision of public transport is negligible. Therefore NOT successful

Policy SS 4 movement and transportation

Planning for residential development in the villages does not support this because only private car transport exists.

Cycling, walking and public transport is not an option. The requirement for development in rural parishes should be reduced.

Broadband infrastructure is still inadequate and not close to being resolved.

Existing levels of light pollution need addressing.

Many properties and farms blaze with light all night. The NDP refers to this but existing settlements are lit up.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

SS7 see question 1 SS4 see question 1 Broadband roll out - still poor 3. Are there any key planning policies that are missing from the current plan?

Missing:Management of the amount of tourism in a locality Encouraging tourism is part of the plan.

Managing the amount of private car travel in rural areas is referred to in the plan but against climate change.

Tourism is creating heavy road usage on narrow lanes in rural areas. Tourism goals and high levels of traffic are incompatible. Public transport in the Longtown Group Parishes is almost nonexistent.

Missing:Proportional development of tourism

Coronavirus has resulted in a massive increase in the number of visitors. The local population has been swamped at busy times. Policies now need to make sure tourist accommodation is proportional to the existing population.

Planning applications for holiday accommodation, campsites and glamping needed to be considered as part of each NDP so that the total number does not overwhelm the locality. As each planning application is considered separately it does not take into count the total effect of all sites. Therefore each planning application for tourism needs to be considered against the total on offer in the parish.

Missing: control of total number of houses offered for holiday accommodation

A large number of people purchase property for holiday lets. This makes housing unaffordable for local people.

There should be a cap on the number of holiday lets.

Councils rates should be very high for second homes and holiday lets.

The villages are dying because of holiday homes.

Missing : effective control of sewage management

Capacity and quality of sewage management needs to be improved.

Criteria need to be stricter and adhered to before development is allowed.

Missing: affordable housing

Criteria for planning need to ensure that developers focus on the needs identified in the NDP and not their own profit. Affordable housing quotas should apply to small sites.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

Tourism planning and capacities should be included.

Numbers of second homes and holiday lets should be a percentage of the total number of residential properties.

Camping and other glamping sites should have policies concerning size, capacity and location.

Planning should be considered in terms of total provision in locality.

Each planning application should be considered in relation to the amount of accommodation already available in the parish.

Transport network should be considered in planning applications. The existing climate change goals should have more weight.

Affordable housing criteria need to change so that local needs can be met.

Profitability of developers should not override the stipulations of the Core Strategy or the NDP.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Yes but since publication there has been an explosion of tourism threatening to swamp the village.

Also need to include climate change and sewage and water services

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

Further rural development puts pressure on private transport which goes against climate change goals.

12%development across areas means building in rural parts with few services and facilities and travel to the towns for service and work. Therefore working in opposition to climate change aims.

Roads are becoming more busy.

Broadband goals have not been met.

Further development also puts pressure on

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

Existing facilities continue but there is no increase in services or improvement in Broadband quality

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

Better Broadband Satisfactory sewage treatment Unless the roads improve traffic will reach unacceptable levels.

### Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

A large part of the land within the settlement boundary is part of a scheduled ancient monument therefore local distinctiveness will be impacted by over development. Sewage treatment is at capacity Roads already too busy Large commercial vehicles too big for roads. Water supply will be a problem 2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

What is the definition of proportionate growth? It isn't a sustainable community if overwhelmed by holiday lets. Visitors only support a few services eg shop, pub etc. very little money is spent on local services or businesses.

#### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

n/a

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

n/a

3. Are there any key planning policies that are missing from the current plan?

Climate change policy

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

n/a			

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Lower Bullingham Parish Council NDP has been a success in the PC's view , however Herefordshire Council don't seem to take it into account when considering planning application made in the parish or at Rotherwas

# **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

n/a

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

n/a	

# Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

n/a

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

n/a

# Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

n/a

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

n/a

#### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

Pollution (high NO2 levels) from A49 through Hereford was to have been addressed with a bypass. However, as planned bypass was subsequently cancelled it cannot be considered to be a success.

Same applies to high levels of NO2 pollution in Leominster at Bargates and proposed bypass has yet to be progressed.

Light pollution has not been addressed successfully at sports facilities such as Bridge Street, Leominster.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

Housing development should focus on areas with sufficient services to ensure sustainable development. Applying a blanket percentage increase across the parish is considered too blunt an approach.

3. Are there any key planning policies that are missing from the current plan?

Planning officers need to give more weight to the views of local communities.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

No. Planners should give more weight to neighbourhood development plans and parish council knowledge on the meaning of specific policies.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Partially – please see #4 above.

# Current Core Strategy settlement hierarchy

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

Development of Yarpole (adjacent parish) has placed increased pressure on shared sewerage system which is now overflowing at times of high rainfall in the village of Luston by the old telephone kiosk. Yarpole needs its own sewerage system.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

No. The objective to reduce car use can't be achieved without investment in bus services. Parts of the group parish have a bus service just twice a week. Other parts have no bus service. There is a regular service in one of the group parishes.

Development of villages needs to include suitable public transport provision.

# Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

Fast broadband is a new service. Public transport is problematic – see #2 above.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

The key is having services for sustainable development. The critical services to support sustainable development are considered to be:

Public transport Retail facilities (at least a village shop) Fast broadband Good road network Proper maintenance of roads Safer roads including appropriate speed limits and pavements to improve pedestrian safety Public access to electric car charging facilities Play area for children of all ages School Medical surgery Comprehensive mobile network coverage

# Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Multi-purpose pipeline which crosses the group parishes and is part of the UK's national energy infrastructure. Development within 50-100 metres of the pipeline is not advisable.

Poor drainage causes occasional surface water flooding and issues at the brook in Luston. The river Lugg needs to be properly maintained by the Environment Agency.

Sewerage system is beyond capacity – see #1 above.

Taking these constraints into account, the village of Luston is unsuitable for much more development.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

No. Insufficient services and facilities to be considered a location for sustainable development. Development constraints as set out above, such as too much effluent from adjoining sewerage system which has made the infrastructure in Luston overflow.



#### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

No comments

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

No comments

3. Are there any key planning policies that are missing from the current plan?

No comments

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

No comments		

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

No comments

# **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

No comments

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

No comments			

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

No comments

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

No comments

### Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Madley Parish have satisfied the current Neighbourhood Development Plan requirements and therefore there is no need for further development within the parish.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

Please see the comment above.



#### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

The Core Strategy (CS) for rural areas is heavily reliant on NDPs, main thrust of CS is focussed on the city and market towns but over 50% of the population of the county live in rural areas.

Most of the CS period has been shaped by the lack of a 5 year housing land supply (5YHLS) and the phosphate moratorium, which has led to the CS having limited use.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

Priorities have changed over the period of the CS, so there is very limited reference to addressing climate change and biodiversity, carbon reduction and natural capital. These are now critical matters and need strengthening, expansion and enhancement so intentions cannot be ignored. Climate change measures, eco and green policies should be mandated and then followed up and enforced if needed.

3. Are there any key planning policies that are missing from the current plan?

Agricultural and land use that drains into the Lugg/Wye catchment should be required by policy to plant buffer strips to reduce run-off.

Housing development is currently being penalised with the phosphate moratorium for a problem that is due mostly to agriculture and land use. Phosphate pollution must be controlled by policy.

Inexpensive small size dwellings that local people can afford and which are needed to keep people in the county are not suitably referenced or supported. This needs to be addressed so that rural areas retain young parishioners and development of expensive large houses is reduced.

More market housing accommodation for older people to buy/rent to stay in parish – downsize option.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

There needs to be consistency of approach to applications from all planning officers. Officers should be supported, trained, have manageable caseloads and should be well managed to ensure NDP policies that are devolved to the NDP are upheld.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Marden NDP has been great success apart from when the 5YHLS was unachieved. The NDP will be updated and expanded if needed.

# **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

5YHLS must be realistic and achievable. Settlement hierarchy should work from bottom up by discussion with parishes to find out what is achievable and then set target for growth, not just arbitrarily impose a number which may well be totally unsuitable.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

Named hamlets in the parish have been put at risk of being unsustainable due to development where utilities and road services are insufficient for sustainability. Development was approved due to the lack of 5YHLS which has/will affect the sustainability of named hamlets.

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

Both pubs are currently closed for refurbishment, one due to reopen in 2022. A local businessman is developing a monopoly of services/facilities within the parish. Post Office service has been reduced to half day opening, which badly affects older residents. Restricted bus services prevent parishioners going elsewhere for post office facilities. 2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

A new community centre to enable activities and services to support all parishioners including elderly and vulnerable. Fast broadband is key and parish is lucky to have total coverage. Parish has 4G but ideally would like 5G sometime. Full time Post Office service needed, currently reduced to only half day. Shop(s), pub(s), venue providing restaurant meals within the parish.

# Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Wish to maintain central village surrounded by discrete hamlets, need to avoid ribbon development leading to Marden village being linked to named hamlets.

Further development will lose prime agricultural land leading to ecological and climate change detriment. Planning policy must be joined up with climate change declaration. It would appear that thrust of policy is for city and market towns and not rural areas, eg. electric buses in the city where people could walk or cycle but nothing in the rural areas where walking/cycling are very much more difficult.

Parish has 2 listed bridges and very narrow roads. It also has industrial and agricultural food business and farms bringing in large HGVs and agricultural vehicles to detriment of parish and leading to frequent damage to listed bridges. Parish does not want more HGVs.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

Currently unsustainable as reduced Post Office hours, poor transport network and very few buses.

View in the parish that on knife-edge of losing services and facilities and that Herefordshire needs to support sustainability positively in rural areas.



#### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider having been successful or not? Please explain the reasons for your answer.

The Core Strategy is a vast document, however the principle of asking communities to generate their own NDP's is a positive step to allow sensible and acceptable plans for future settlements. Unfortunately, all the planning applications for permanent dwellings submitted under the planned and approved terms of OPGPC NDP have been rejected by HC since spring 2018. The only exception being 2 properties in Ocle Pychard, that were on land outside the settlement boundary (OPG 5), declined by Hereford Planners but won on appeal. In summary the principles of the Core Strategy are good but the processes are not working as defined.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

Currently it seems that every planning application that passes through OPGPC gets rejected on topics relating to waste and foul water. Even re submissions with alternative systems are getting rejected. Can Hereford Planners please explain what system is acceptable?? Then repeated submissions along with the timewasting and associated costs could be eliminated.

3. Are there any key planning policies that are missing from the current plan?

The planning policies that are missing seem to be the ones that allow new or converted dwellings to be approved. Under the terms of OPGPC NDP we have submitted our approval to various submissions, for dwellings and affordable properties in line with the terms of the Core Strategy. Hereford Planners are rejecting so many proposals for new builds that have been identified in our NDP that it really makes some parishioners wonder why we made such an effort ~ especially as there is no positive direction from HC about the water related issues.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

OPGPC think so but rejections by HC make us doubt we are both heading in the same direction ~ which seems to contradict HC approval of our NDP.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Yes ~ we believe our approved NDP (19 March 2019) received some very positive comments from HC and the requirement for dwellings was set at a min of 36. We submitted 48 in Feb 2019 and currently we have 54 sites now identified.

# **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

None ~ Lack of planning applications being accepted.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

There is no proportional growth in OPGPC as all our efforts and planning applications we approve get rejected by HC.

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

No new services have taken place.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

Drainage and the waste water related issues is a major problem and nothing has changed in our parish. Bus services have diminished but that is probably due to economies and COVID related issues

# Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

The constraints imposed by HC, again relating to waste water issues is a very major problem for OPGPC, as it is for many other NDP's in Herefordshire. It has been suggested that relaxing the settlement boundaries could provide more opportunities, however that is not helpful as it would mean, more planning applications, more rejections, more cost and more timewasting for all parties involved. For the reasons of waste water ~ no more applications would be approved ~ so there is no reason to change settlement boundaries.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

No ~ we have already stated in our NDP our future growth plans and if HC will start to approve the outstanding applications, then we can proceed to meet the desired targets.

#### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

No problems or issues from a parish perspective.

Bypasses not delivered:

\* No Hereford bypass (A49)

\* No east-west bypass at Leominster

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

Review drainage to ensure it is of an appropriate sustainable standard across the villages and parishes.

3. Are there any key planning policies that are missing from the current plan?

Not known.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

Satisfied with NDP... successful process. It should be given more weight when assessing applications.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Success... has delivered.

### **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

NDP set out to deliver 14 percent more housing across the parish. At present time, the settlement hierarchy has had no detrimental effect. However, sewerage infrastructure is at or beyond capacity. If further development that accesses existing services is to be considered, then they will need to be appropriately upgraded and capacity increased.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

Bus service retained but number of journeys reduced slightly. Fast broadband is a new service.

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

Yes, on balance.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

Eco orientated services such as public electric vehicle charging points and improved building standards (PV panels, draught proofing, ground/ air source heat pumps) will be vital to meet the challenge of climate change. Fast broadband is important for home working, rural business and farms. Effective sewerage and drainage, particularly in light of expected heavier rainfall events. Shop and PO. Pub(s). School. Surgery and medical services. Recreation ground/ facilities. Places of worship.

# Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Sewerage at capacity and drainage able to cope with prolonged rainfall. Medical facilities. 2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

Subject to issues being addressed under #1 above, the area could be a sustainable community.



#### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

Neighbourhood Development planning team have been excellent in advising and facilitating NDPs.

The Core Strategy has encouraged wider thinking and action amongst the population on development generally and sustainability in rural areas.

The place shaping has focused minds on allocating appropriate sites.

The Core Strategy has encouraged parish councils to consider the development of their neighbourhoods in the round.

The Core Strategy has not been successful in improving worthwhile communication between various Herefordshire Council departments and neighbourhoods.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

The Core Strategy should impose a need for Herefordshire council to have a higher regard for all aspects of Neighbourhood development plans the reason for this comment is that Herefordshire Councill's interpretation of NDPs can vary wildly from what is written or intended.

3. Are there any key planning policies that are missing from the current plan?

A sustainable countywide infrastructure plan to ensure provision for schooling, sewerage, medical provision and water and drainage/sewerage services.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

They are at the right level subject to Herefordshire Council respecting them.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Yes – so far so good. Potentially up to schedule in terms of new houses despite phosphates, but who knows what is going to happen between now and 2031.

# **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

None. Whilst there had been a possibility that we might be required to accept numerical allocation from other parishes (which would have been strongly resisted) this did not occur.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

Yes – The Pembridge NDP has encouraged sustainable development.

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

Existing facilities have been retained although it is hard to give credit for this either the Core Strategy or the Neighbourhood Development Plan.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

A Pembridge Bypass – this would make areas of Pembridge more accessible and attractive for tourism, new business and create a safer environment in the heart of the village

Better public transportation – currently has a poor service for parishioners. If electric vehicles become common use, thought must be given to the provision of recharging facilities.

# Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Assuming the settlement boundary remains the same, growth will be limited by the constraints within that boundary. Sewerage system and other infrastructure. Amount and type of traffic on the A44 Capacity of local schools Capacity of NHS The economic health of Herefordshire – i.e. will there be jobs?

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

We would consider the community to be sustainable for the foreseeable future say to 2050. However, this is a guesstimate only and dependent on other factors particularly infrastructure.



#### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

Most of the Core Strategy policies are fairly generic in nature, reflecting national policy to encourage a range of development types while offering various levels of protection where necessary. It would be better if the Core Strategy was more county specific. Furthermore, the Core Strategy should indicate a wider number of environmental design requirements to be met within any revised policy RA2 and should not just restrict environmental requirements to smaller settlements (i.e. those listed in table 4.15). This gives the impression that such constraints are not so important for those settlements listed in table 4.14. Some of the settlements in table 4.14 are just as sensitive as those in table 4.15, and possibly some are more so. Hence environmental design requirements should apply to all settlements. The levels of proportional growth set (if this approach is to be retained) should also be influenced by environmental constraints and sustainability requirements. Greater research should be undertaken so that constraints such as AONB, conservation designation and settlement pattern defined in the Landscape Character Assessment inform the level of proportional housing growth. This would comply more appropriately with NPPF para 70.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

There should be a greater emphasis on design – the concept of 'place making' should be given a higher profile, enabling parishes to define what is important to their settlements. A stronger stance should be taken on refusing developments of poor design.

3. Are there any key planning policies that are missing from the current plan?

NPPF para 64 enables Councils to set a lower number of dwellings requiring provision to be made for affordable housing in designated rural areas. NPPF Annex 2 defines such areas as '*Nationals Parks, Areas of Outstanding Natural Beauty and areas designated as 'rural' under Section 157 of the Housing Act 1985'*. Hence the current Core Strategy is not up to date with the NPPF in this regard and needs to be made so. This would enable more affordable housing to meet the needs of rural areas, reducing pressure for uncharacteristic forms of housing development.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

There appears to be a disconnect between planning officers, policy developers and parish councils in terms of interpreting policies for certain forms of planning application. It is accepted that there will sometimes be differences in terms of interpretation, but these should be kept to a minimum in order to retain the integrity of the relationship between the two documents. More detailed information upon interpretation would help. This is not assisted by inconsistencies in terms of policies and supporting text. For example, policy RA2 refers to '*in or adjacent to (settlements)*' whereas paragraph 4.8.16 states '*Residential development will be located within or adjacent to the main built-up area(s) of the settlement*'. Given the form of many settlements in Herefordshire which contributes significantly to its character (especially AONBs), the latter is more specific in terms of defining what comprises a settlement and should be used in policy RA2 for consistency.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Peterstow's NDP continues to be relevant to the parish and effective. The policies in the NDP have sometimes been referred to specifically in planning decisions, but not always. This could be improved to ensure that the NDP is fully considered.

# **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

The level of proportional housing growth required within the parish does not take into account the environmental constraints, in particular its location within the Wye Valley AONB, the fact that it is a Conservation Area, the absence of a public sewer and its very high-water table. Policy RA2 should specifically include the need to ensure these are important considerations and inform the level of proportional housing growth should the current approach be retained.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

Peterstow, like many other parishes named in the settlements of policy RA2 has met its required level of proportional growth, which assists with the aim of rural sustainability.

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

The key services and facilities in Peterstow include its post office and shop, public houses, St Peter's Hall and its open spaces. These have all been retained. Development of the shop site would have benefits including the retention of an important local service through increasing its viability and potential enhancement to the Conservation Area. However, the planning application relating to that site is ongoing.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

The existing services in Peterstow would need to be retained as a minimum in order to support proportional growth. The maintenance of the bus service to at least its current standard would also be necessary. A reduction in the speed of the traffic passing through the parish in addition to a crossing on the A49 would help if there is to be an increase in the number of people using the facilities. Water drainage would need to be addressed, possibly by connection to the mains sewer.

### Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

As mentioned above, Peterstow has a number of environmental constraints to new development, such as its location within the Wye Valley AONB, the fact that it is a Conservation Area, the absence of a public sewer and its very high-water table. Traffic is also an issue both in terms of the unsuitability of the road network for an increase in road users and the problem of speeding on the A49.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

Peterstow has already exceeded the required level of proportional housing growth in its NDP and therefore there is limited scope for further development, especially given the constraints referred to above.

### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

The term "minimum" in the Core Strategy has little meaning as no maximum is set, not even a +/-% margin. This results in the risk of over-development (PG is already over the 2031 target by 48%). Without a maximum, this leaves settlements hostage to further development above and beyond that set out in the Strategy and that identified in the NDP process. Moreover, NDP's quickly become redundant and require reviewing, at some cost in order to manage these demands.

The strategy is very weak on rural development. This has led to developers use of the "urban" NPPF in rural settings resulting in inappropriate housing density, compounded by the sameness of house design competing against the hodgepodge architectural design that more typically characterises small communities. This undermines the rural character of villages, transforming them into suburban islands in a rural setting.

The Core Strategy itself must be interpreted in accordance with the latest version of the NPPF (dated 20 July 2021), meaning appropriate road network capacity, local sewage treatment needs, flooding and drainage issues, preservation of biodiversity and the character of ancient heritage and surrounding rural greenfield sites particularly of outlying villages, and of course Canon Pyon itself, quite apart from maintaining suitable privacy requirements and insisting that brownfield development sites be a priority. It is felt that recent planning applications do not meet all these necessary standards.

It is felt that Policy SS1 is very weak in setting out the three pillars of sustainable development; economic development, social development, and environmental protection. This can lead to inappropriate development.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

Policy SS1 needs reinforcing (as above).

There needs to be differentiation between urban and rural settings. At risk is the rural character of the county which consequently supports economic sectors such as agriculture and tourism.

Proportionate growth should include a proportionate rate of growth. The rapid increase in the size of a community runs the risk of overwhelming the existing infrastructure and social structure of the community

Supporting infrastructure needs to be sequenced with housing and industrial development. To date there is no prospect of an increase in small scale industrial/ workshop job opportunities despite the larger population. For example, road capacity needs to be improved to meet the needs of industrial and housing development. Similarly, bus services need to be in place to support the new residents as they arrive, otherwise, they will need to adopt the use of private transport; a dependency that will be hard to break out of. Sewerage treatment capacity needs to be increased, otherwise "packaged sewerage systems" will need to be adopted at scale, an inefficient use of land, and one that has an impact on the future use of land.

3. Are there any key planning policies that are missing from the current plan?

The need to reflect the rural nature of communities in development proposals.

Linking industrial/employment and housing development policies together, tied into transport infrastructure; building homes where they are needed, not simply where land is available.

Provision for working from home, including conversions, extensions and similar. This also needs to accept that for some working from home scenarios, this will include business visitors to the property.

Better recognition of the role and value that the rural economy plays in the county. Farmland, paddocks, orchards etc have a current and future economic role and once lost, can not be recovered. This implies that the Core Strategy should have a preference towards using brownfield and the reuse of redundant buildings.

Despite their value, the Core Strategy does not appear to set out a vision for farming, or recognising that with climate change, this will go under considerable transformation in the coming years. Whilst policy RA6 addresses the rural economy, this is in terms of diversification, tourism, support activities etc. not farming or equestrianism two industries that provide the foundation of the rural economy.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

The lack of a 5 year land supply in the county until recently created a real issue by shortening the life-span of the NDP. Notwithstanding that the current "made" plan is supposed to last until 2031, and that targets set by the Core Strategy exceeded, it has

been overtaken. The PG NDP is now being reviewed tying up the spare time of those involved in producing it, as well as the financial costs.

Moreover, NDP's are having to become more and more detailed. This is in reaction to developers seeking wording that can be exploited, resulting in developments that do not reflect the original intent of the community. For example, planning applications that attempted to exploit the lack of a 5 year land supply to propose developments outside the village settlement boundary in made NDPs.

It appears that no consideration is given to the fact that NDP's are undertaken by nonprofessionals in their spare time, and are then contested by development professionals with far greater resources, ignoring the intent of the community. Critically, this undermines the underlying democratic aim behind the Localism Act.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Moderate success, in that sites identified have been developed, which together with other small-scale developments have now more than exceeded the target set in the core strategy (by 48%). This has been within a short period of time resulting in continuing applications by developers for even more house building, further increasing the load on the local infrastructure, and the need for a review.

Notwithstanding that the target was a minimum, as it has been exceeded well before the end date of the plan (2031), this has resulted in:

Local infrastructure being placed under pressure and not keeping pace with housing development.

Demand for the NDP to be reviewed, tying up the personal time of the people volunteering for the task.

Reviewing the NDP imposes costs for consultants, public consultations, the scrutiny process and any subsequent referendum.

The consequent need for additional applications that go beyond the original plan to be scrutinised in detail.

The risk that applications that have a legitimate claim to meet local needs will refused due to concerns of over development.

# **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

For understandable reasons of road infrastructure and access to local services, the settlement hierarchy has resulted in development being centred in Canon Pyon which has grown by around 70% in the past five years. This settlement was identified in the Core Strategy settlement hierarchy.

In addition, if all of the pending applications go ahead, this growth will exceed 120% before the 2031 end-date. This will make the NDP and the aims of the Core Strategy meaningless.

In addition, other small-scale developments within the Parish Group have also contributed to the overall target of the Core Strategy. These typically consist of 1-3 house developments, building conversions and the like. This reflects the typical organic growth within a community, meets local needs and the use of redundant properties. However, the possibility of this approach to meeting overall housing demand does not appear to be reflected in the settlement hierarchy or projected in the Core Strategy.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

No, growth has not been proportionate nor has it been proportionately implemented.

In terms of sustainability, as the settlements within the Parish Group have moved increasingly towards a commuter bias, this has relied on access to services outside the community.

Economic benefit has been marginal (see below) with developments increasing the bias towards a commuter community which relies on access to services outside the community. There has been a cost to the local community in terms of increased wear and tear on local roads, drainage system, and increased load on sewerage system. There is also some evidence that recent developments have contributed to flooding, a factor that has seen residents having to invest in flood defences.

Socially, growth has made some contribution to community activities; use of the playing fields being a good example. However, use of the local first school is mixed, a number of parents sending their children to schools outside the community. Anecdotally this is due to a mix of reasons, such as better facilities elsewhere, or keeping children in the same school before moving to the Parish Group, or using schools close to their parents' place of work, thus easing dropping off and collection. However, commuting now dominates,

this, it is felt, hampers social integration. Notwithstanding this observation, it is felt that over the coming years, the social contribution from the developments to the community will improve.

Development has had a detrimental impact on the local ecology, in particular housing density in a rural setting, including habitat loss, and a collapse of the number of species that are supported within the settlement boundary. Whilst accepting that any housing will have an impact, for a rural community this is more likely to impact the more specialist species, compounded by modern housing having small gardens. Moreover, offsets, whilst welcomed are seldom within the community, compounding the loss.

In short, the settlement hierarchy should reflect the sustainability of the available infrastructure and services. In rural villages and smaller settlements, where there is no or little infrastructure and limited road capacity, it should be emphasised that additional housing should only be added by way of in-fill and extensions to existing dwellings, with no back-land developments. Bland statements that more housing is necessary, is totally unacceptable unless strong statistical and economic evidence can be presented to justify the sustainability of the location in question, and to make the case within the context of the Core Strategy, the NPPF and the NDP.

#### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

Most existing services have been retained (one PH within the Group has closed, although COVID will probably have been a contributory factor). Super-fast broadband is a new service.

For the existing services the developments have had a marginal benefit. For example, in the case of the village shop in Canon Pyon (the only one within the 27 km2 area of the Parish Group), it has seen a 5-7% increase in trade, despite a 70% increase in the number of dwellings in the village, and even then, most of the increase is attributable to increased passing trade (the shop is on the A4110).

Reflecting on this, it is believed that those who commute to work are more likely to make the top up/small scale purchases typical of the village shop on their way home in Hereford, Leominster or elsewhere; the main component of this being the time factor of the evening commute and the need to be assured of making a purchase before shops close at 1800.

For the two remaining PH's, whilst anecdotal there has been no significant increase in clientele. Both PH's, like many similar establishments rely more on the food trade. This low take-up is attributed to younger residents orientating towards Hereford for entertainment.

In the case of Canon Pyon the playing fields (held in trust) have benefited from increased use and from additional volunteers to help with maintenance. However, once again COVID with the lockdowns and working from home will have been a contributory factor by freeing up volunteer time.

Canon Pyon is the only settlement served by mains sewerage. This is now believed to be at over-capacity. This is a Primary Treatment Plant relying on settlement tanks to separate water from contaminants (sludge), which are then removed. As the capacity of the tanks is fixed, increasing in-flow demand can result in less time for the waste water to separate, increasing the water content of the sludge, consequently increasing the frequency of the tankers needed to remove it.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

Improved bus service, without which dependency on private transport will continue.

Improvements to local school buildings; the village school is still using "temporary" classrooms that are 30 years old.

Pedestrian walkway linking Canon Pyon village to the local school, around 400m distant on the A4110. Currently, pupils either get to school by car, or using school bus. The alternative is to relocate the school to Canon Pyon village (a site has been allocated for this purpose in the NDP).

Better access to primary health; there are no primary health services in the Group. Residents rely on travelling to Weobley, Bobblestock, Hereford, Leominster or elsewhere for both primary health, and dental services which increases the need to have access to private transport.

Increased capacity at the Canon Pyon sewerage works.

Improvements to the drainage system, both road and within the communities. In the case of Canon Pyon recent developments have occupied land that previously absorbed surface water. This has increased surface flows adding to historic issues over surface flooding.

Improvements to the drainage of the rural lanes that connect the settlements within the group.

### Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

As the community has been over-developed any further development would be disproportionate. This has undermined the settlement hierarchy.

The constraints to further development would include:

Impact on the local school

The narrowness of local rural lanes, typically single track, with increased traffic causing increased damage to road surfaces and drainage system

Lack of capacity in the local sewerage works

The increased traffic levels that are already making rural lanes unattractive for leisure use such as walking, cycling and horse riding. This can also have an impact on local tourism.

Increased traffic is adding to congestion on the feeder roads into Hereford, Leominster Access to public transport

Further impact on the local ecology

Impact on the farming community

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

Whilst there is scope for very small scale infill development in the Group, it is felt that there has been over-development that has placed too much pressure on local infrastructure and on social structures. In the case of Canon Pyon and a lesser degree, Westhope, this has transformed the settlements from being rural and close knit in character to being commuter villages with a looser social construct.

It is also argued that the influx of people has had an impact on farming in the area. Feedback from local landowners has indicated that this influx has led to an increase in trespass, some crop damage, issues over dog walking (uncontrolled dogs, dog mess) and litter. Whilst these may appear to be minor irritations, these potentially can have high costs for the farmer and are bound to lead to a degree of friction.

In addition, there is the increase in traffic. Whilst this can be attributed to the general rise in vehicles, on the narrow lane rural lanes. Passing vehicles on narrow lanes without formal passing places leads to damage to verges, ditches, and gateways. The more development, the more traffic, and the more damage.

As recent development has been disproportionate and with further house building in the pipeline, any further housing, notwithstanding accepted scope for small scale infil, use of redundant sites or building conversion, would be unacceptable.

### Herefordshire Local Plan update – pre-consultation survey

### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

Richards Castle PC considers that delivery on the core strategy has not been successful in the parish in the following respects:

\* Affordable housing has not been delivered as part of development in the village;
\* The views of the parish council and community appear to have been ignored when commenting on planning; and

\* The community includes Richards Castle in Shropshire and the parish council would like to see an approach which allows for a whole village approach.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

Give the NDP more attention: housing density, building materials and environmental concerns raised about a housing development did not seem to be taken into account by the planning authority when reaching a decision.

NDPs should be given greater weight, and it should be accepted that parish councils understand what their plans are intended to achieve.

3. Are there any key planning policies that are missing from the current plan?

Duty to undertake genuine consultation with local communities.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

Update to account for latest environmental concerns and infrastructure. Devolve policies so that parish councils have a greater say on planning applications.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

No, not the development envisaged in NDP. The development given planning permission on the allocated sites is considered to be unsuitable and contrary to the wishes of the community as highlighted above under #2.

### **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

The settlement hierarchy has led to increased housing and development in line with the Core Strategy (+14 percent uplift). It is too early to say what the impact will be – one major site is still under construction.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

No, policy RA2 includes settlements that are without the services required to be in place to be considered sustainable. Many have no buses, no school, no shop, no medical surgery, no post office.

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

Existing services have been retained. Fast broadband, a new service, is expected to be in place through Fastershire.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

Key services and facilities required to support proportional growth are frequent bus service, better maintenance of roads, broadband, pavements on all main roads in the villages, public amenity space with facilities for children and young people, shop, post office, surgery, school, serviceable mobile coverage, village hall, public charging points for electric vehicles, garage (vehicle maintenance), and employment opportunities

### Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Limited and constrained services and facilities – the parish has a pub and bus service which runs 4 times per day. Fast broadband is coming. The other essential services and facilities referenced above under #2 are unavailable in the parish, or in the case of pavements on main roads, incomplete.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

No, for the reasons set out above under #1. Exception housing might be sustainable if it includes extensive eco or passive house capabilities in the design.

### Herefordshire Local Plan update – pre-consultation survey

### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider have been successful or not? Please explain the reasons for your answer.

1. In relation to SS1, it would be appropriate for all Herefordshire Council owned land holdings to be considered strategically for both residential and commercial developments in order to speed availability. The current plan is based on pre land disposal plans and this needs to be re-assessed and updated. A new SHLAA needs to be done to take into account current holdings.

2. Implementation of SS6 for local distinctiveness has been weak – most new developments are from national pattern books. Local examples of this include the Persimmon/Old Tannery Walk development and St Mary's Garden Village.

3. In relation to Ross-on-Wye, the designation of the conservation area needs to be revisited. The boundary should be moved to reflect the area that lends itself to this purpose. Evidence to support a review of the boundary includes the development at Oaklands Farm and Cawdor and there are TPO's within the boundary that need reviewing.

4. RW1 is notable for its failure to deliver meaningfully and local input is not invited. For example, the new footpath was laid along the relief road but there was a failure to upgrade the footpath through the caravan park, meaning provision that could have been improved has resulted in a longer and less accessible route.

5. RW2 was an opportunistic strategy that is commercially unattractive and has still, therefore, failed to deliver.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

1. Fig 3.1 re. Environmental Quality should have more emphasis in relation to Fig 3.2 as the Key Strategic Decisions take no account of the declaration of a climate emergency. The decisions and alternatives in the grid therefore need to be revisited with a view to significantly amending strategic targeting of both residential and commercial developments so that much better use is made of the current (Moreton-on-Lugg) and emerging (Pontrilas) rail infrastructure. Therefore lower expectations would be placed on sites which are road transport (car) dependent.

2. Policy ID1 should improve the procedure for involvement of Town and Parish Councils with regards to S106 agreements. There should be formal consultation with Town and Parish Councils on every S106 agreement during the early stages of drafting. Training for

Councillors on S106 agreements and how to maximise their potential should be planned for each election cycle.

3. Are there any key planning policies that are missing from the current plan?

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reasons for your answer.

The policy areas are sufficient, however if they are not taken into account, they are futile.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Ross-on-Wye has an adopted Neighbourhood Development Plan and unfortunately so far the Town Council have been disappointed in the impact that the plan has had. As an example the planning application for Land off Middleton Avenue, Ross-on-Wye goes directly against the Neighbourhood Development Plan and was refused by Herefordshire Council. However this decision was overturned by the Planning Inspectorate. A further example is relating to the recent planning application for a new science block at John Kyrle High School when the Town Council expressed concerns about the design and colour scheme of the new building and the impact the north elevation would have on the landscape - as seen from the A40/A449 and Brampton Abbotts. Ross NDP Planning Policy EN7 states that "Development proposals likely to affect Key Views should assess the effect of the proposals on the view(s) and demonstrate how any adverse impacts have been addressed". It was suggested that consideration was given to having a colour scheme that would reduce the impact and make it less obtrusive than white. This was ignored. These examples lead the Town Council to be of the opinion that Neighbourhood Development Plans are not given the due weight and consideration that they should be. A considerable amount of time, effort and resources went into the creation of the plan and it has been blatantly disregarded.

### Level of growth

1. Do you consider that the current housing targets for the city or town have helped to sustain its role as a service centre? Please explain the reasons for your answer.

2. What would you consider is required to improve or maintain its viability? Please explain the reasons for your answer.

3. Are there any constraints to new development in or around the city or town that would affect its ability to sustain future growth? Please explain the reasons for your answer.



### Herefordshire Local Plan update – pre-consultation survey

### General Questions

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

Relationship with other strategies and support of Neighbourhood plans appears to be good. But no real evidence that they are communicated effectively.

General communication of Core strategy across the community quite poor. When asking parishioners if they had heard of or understood the Core Strategy, most had limited if any knowledge.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

Communication and clearer understanding overall and specifically of SS2, Delivery of New Homes. There seems to be some ambiguity around whether or not certain Parishes have met their quota.

Confusion exists over what is included in Windfall.

3. Are there any key planning policies that are missing from the current plan?

No, none that spring out.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

Yes appropriate to the level required for NDP's.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

We are currently in the NDP 6-week Consultation period so not sure of final outcome at this point.

### **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

The HMA's strategy and development in Bromyard appear to have had little effect on rural housing proposals.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

Only after the Stoke Lacy NDP is 'Made' will we be able to answer this question as there are several proposed developments being presented to Herefordshire Council currently as well as recommendations from the NDP Steering Group to the Parish Council.

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

No new services appear to be apparent even though a new development was created in Stoke Lacy with 28 houses. Some existing services such as bus travel appear to have actually reduced during the last few years.

The 106-money promised to the Parish as a result of the development has failed to materialise even after many requests. The effect of this is that the Parish views promises from Herefordshire Council with a certain amount of cynicism.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

Bus services and footpath routes between Stoke Lacy and Stoke Cross and safe footpath routes from the rural area to Bromyard.

Currently bus services are not reliable and there is no easy footpath route between Stoke Lacy and Stoke Cross and on to Bromyard.

### Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Constraints include:

- Disruptions to current infrastructure
- Building of houses that are not in keeping with the rural environment
- Water courses and pollution of local streams

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

No comment at this stage until our NDP has been reviewed and a referendum held.

# Herefordshire Council

#### Herefordshire Local Plan update - pre-consultation survey

#### **General Questions**

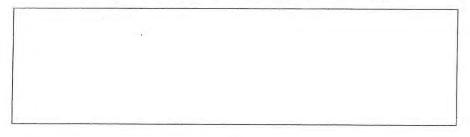
1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

Policies have senerally had lettle impack on life n all 4 porisher - Facilities & Wasport not improved.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

Need to allow for area variahous Lathin sweeping policies

3. Are there any key planning policies that are missing from the current plan?



4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

Yes - although aways need

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

been shlo NOF to be formally adan I due to phosphates Has been used successfully in planning emplication determinations through

#### Current Core Strategy settlement hierarchy

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

Little impact - V. miral parship ith no facilities

Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

Has allowed for some small developmenti.

Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

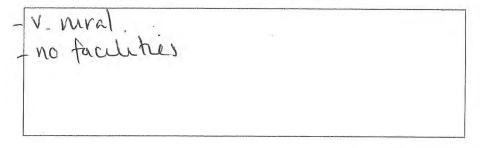
Almost no services within pamiller No charge in them being developed

What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

- upgrade of highway infrashrichere - comminty facilitie

#### Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.



2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

No No commity Aciticies too nivel poor highway infrashing too nival e generally



### Herefordshire Local Plan update – pre-consultation survey

### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

Policy SS1 Presumption in favour of sustainable development.

This has resulted in in appropriate planning decisions. HC has passed plans that are too dense for a rural area for fear of the government inspector who is principally interested in numbers and a presumption in favour.

NB

In the recent HALC information corner, it is noted that Michael Gove made it clear that he is no fan of the 5-year housing supply rule--saying that it forces Inspectors to pass bad plans. Instead he is promoting three core principles of Beauty, Infrastructure and democracy in new plans. He also declined to endorse the 300,000 houses a year target saying that plans should not be driven by targets but by principles of social justice and quality of life and there being a need to look at housing targets in <u>context</u>

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

There must not be a presumption in favour of development. There must be greater emphasis on affordable housing Because sites of less than 10 houses are not obliged to have affordable housing, this means that most small sites in rural areas have no affordable housing. Consequently the same rural area will be dominated by housing unaffordable by local families and very often bought up by wealthier incomers. 3. Are there any key planning policies that are missing from the current plan?

There should be a revised policy to ensure that county-wide, a high proportion of houses should be affordable. This should result in refusals for sites dominated by expensive houses unaffordable by local families especially if 65% of the targeted increase has already been taken by non-affordables0f consents

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

Yes, if they are observed Too often a genuine local concern has been overridden by Herefordshire council

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Too early to judge

Some inappropriate developments have occurred that have produced an unsuitable urban density of housing in a rural area. These took place prior to the NDP

We will judge the NDP on an outline housing proposal which we consider unsuitable and has not yet been determined

### **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

The pressure to build houses has resulted in the loss of both pubs within the parish It has also provided more dormitory accommodation for Hereford Neither of these points encourages local involvement

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

The 18% growth for Stretton Sugwas, Swainshill has been well exceeded

Most housing is nothing to do with rural sustainability but as dormitory accommodation for Hereford or elsewhere. Much of the housing approved is likely to attract buyers from more affluent parts of England and little is affordable.

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

The church, school and village hall are retained but 2 pubs have been lost to housing development

A new roadside footpath has been provided to link the footpaths of Stretton Sugwas and Swainshill. This was part of a planning condition

A housing development at Swainshill was proposing to remove the traditional bus pull-in within the highway against the principles of sustainable development and public transport provision

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

The church and village hall provide community, social and health and well-being facilities. The village hall has the potential for ancillary NHS services

A bus service is required to serve the community

Most other services would be provided in Hereford

### Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

As a parish adjoining Hereford, it is important to avoid over-development and maintain a rural break from the town

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

Only in so much as the constraints in (1) above are observed

## **Sutton St. Nicholas Parish Council**

## Herefordshire Local Plan Update – Pre-Consultation Engagement

General Questions:

# 1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

The Parish Council considers that the strategy addressing development, traffic and transport is flawed. Traffic volumes have grown but this has not been matched by adequate highway infrastructure around Hereford, with adverse implications for the parish. Traffic flows on the A4103 Roman Road are beyond maximum capacity at the railway bridge with single lane traffic lights between the VW and Land Rover Dealerships. This has become a critical bottle neck for travellers to Worcester, Gloucester and beyond and vice versa.

With the use of car and HGV sat navs constantly looking for the quickest route, vehicle drivers are guided to bypass the A4103 when traveling from the west of Hereford on the Roman Road to Worcester etc. They now come through Moreton-on-Lugg and Sutton St. Nicholas and pick up the A4103 later on their journey. To make matters worse the opening of the Bloor Homes bypass through the new housing estate to the A49 north of Holmer for the relief of traffic traveling from west to east on the Roman Road has pushed even more traffic through Moreton-on-Lugg and Sutton St. Nicholas. This has resulted in excess of 250 vehicle movements through the village in the peak weekday hours on a route which passes through the Conservation Area, is unlit and generally without footway. **Highway safety and village character is being harmed by the significantly increased volume of traffic.** 

# 2. What elements of current core strategy policy could be improved? Please explain the reasons for your answer.

The Parish Council considers that aspects of the local delivery of rural housing could be improved:

- The aims of the strategic approach are to "bolster existing service provision, improve facilities and infrastructure and meet the needs of the communities concerned" (Core Strategy policy RA2). This is a problem because directing growth through a percentage figure applied to all rural settlements in each Housing Market Area is too blunt an instrument to maintain and strengthen locally sustainable communities. Attention needs to be given in each case as to whether further development can reasonably be expected to boost rural sustainability, or just mean more people travelling by car to access goods, services and employment elsewhere, adding to the increases in through traffic displaced from around Hereford.
- Whilst policy RA1 promises that "local evidence and environmental factors will determine the appropriate scale of development" in practice the growth allocations have been applied by the Council and NDP Examiners as minimum requirements. Neighbourhood planning becomes a housing numbers game which has eclipsed the opportunity to balance social, economic and environmental factors at the parish level. This has made it harder for communities such as Sutton St. Nicholas to genuinely address local housing needs and to thereby support services, employment and facilities. More freedom and flexibility should be given to local communities in determining what is appropriate, including taking account of the actual pattern of local services. For example, since the Core Strategy was formulated bus services from the village into Hereford have been reduced, yet this cannot be reflected in local policy under the present approach.

- The approach whereby the larger the village the more growth is expected of them is not one that can be pursued indefinitely without harming the character of the community concerned. Sutton St. Nicholas has doubled in size in the last 40 years. As a result, it has lost much of its socio-economic identity and social 'glue'. This harm is continuing in 2011, there were 389 households in the parish; since then, 104 new homes have been built, given permission or allocated an increase of over 26%. What is now needed is a period of consolidation in the period up to 2041 so that the community can recover its identity.
- The Core Strategy places a welcome emphasis on the role of NDPs in delivering housing in a planned way. Given this, a clearer expression in policies RA2 and/or RA3 that land **outside** but **adjacent** to settlement boundaries defined in NDPs is in the countryside in planning policy terms (and so subject to policy RA3) would be helpful. As it stands, scheme proposers point to the words "in or adjacent" in policy RA2 as supporting their proposals, even though they may be outside an NDP-identified settlement boundary.

#### 3. Are there any key planning policies that are missing for the current year?

The Parish Council are not aware of any notable omissions.

# 4. Are the policy areas that are devolved to NDPs at the right level? Please explain your reason for the answer.

Yes, subject to the comments above as to need for greater flexibility to be made available to balance an appropriate scale of development with local services, facilities and employment in working towards a sustainable community. With this caveat, the Parish Council supports the role given to them in meeting local housing requirements, defining a settlement boundary for the village and designating Local Green Space.

# 5. If you have an adopted NDP, do you consider it has been a success? Please explain your answer.

Yes, in that it has met the challenge set by the Core Strategy to identify a minimum amount of new housing and in so doing enabled the community to set in place a settlement boundary and identify Local Green Space, as well as setting out policies on housing mix, landscape character and other matters.

No, in that the NDP has not been able to respond to local evidence or environmental factors in determining the appropriate scale of development. Accepting and enabling new development through the NDP has **not** proved to be a means of bolstering or improving existing services, facilities and infrastructure. A particular issue that the NDP can do nothing to address is the harm to highway safety and village character arising from traffic being displaced from around Hereford to route through Sutton St. Nicholas (see above).

#### **Current Core Strategy Settlement Implementation**

# 1. What impact has the current settlement hierarchy had on your Parish? Please explain the reasons for your answer.

The settlement hierarchy identifies Sutton St. Nicholas as a "main focus" settlement. The Parish Council has sought to manage and control the scale of development that this might have brought through the preparation of its NDP and adoption of a settlement boundary. Now there is a five-year housing land supply and plans are up-to-date we feel we have some protection against development which the settlement hierarchy may otherwise have brought. This does not mean we are not under pressure from disproportionate proposals, and we are dependent on the local planning authority taking decisions in accord with the NDP.

# 2. Do you consider the current distribution of proportional growth in the named settlements RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for the answer.

No. This is because the distribution of growth by means of a percentage figure applied to all identified rural settlements in each Housing Market Area is too blunt an instrument to deliver rural sustainability. It directs more growth to larger settlements with insufficient attention paid as to whether such development will actually serve to "maintain and strengthen locally sustainable communities" (policy RA2). In Sutton St. Nicholas, there is no evidence that the community is more sustainable as a result of growth since 2011 or that planned in the NDP. There has been no increase in services, jobs, facilities or infrastructure in this period and bus services have reduced. There is no sign of any improvements to come (it is acknowledged that some affordable housing will result from the two NDP allocations in due course). The non-implementation of the Community Infrastructure Levy has exacerbated this position. With no clear link between more houses and better services and facilities, if more housing development is to be sought in Sutton St. Nicholas it will mean the village will continue to evolve into a dormitory settlement to Hereford rather than as a sustainable community.

### Services and Facilities

# 1. Have existing services been retained or new services and facilities provided through development in your Parish? Please explain the reasons for your answer.

No. Whilst the Village Hall and Sutton Primary Academy were delivered in 2008 alongside new housing, otherwise services and facilities have reduced: the village shop has closed and bus services have declined, limiting transport options into Hereford.

# 2. What would consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain reasons for your answer.

The NDP household survey shows residents want to see a village shop, Post Office and hairdressing salon. A local convenience store selling day-to-day essentials like bread and milk would be of notable benefit, particularly given the older demographic (26% of the parish residents are now estimated to be aged 65 or over, up from 22% in 2011).

A further issue is car parking at the Village Hall for community events and hirings especially during school term time. Since the new school opened the number of children has grown from circa 60 to 185. The shared car parking space serving the school and the Village Hall has not grown at all. This is becoming a serious issue creating congestion and needs County Council resolution should the school want to increase its Planned Admission Number to accommodate further proportional growth.

#### **Future Settlement Hierarchy**

# 1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

The public consultations for the NDP and recent planning applications have highlighted the following constraints to future growth in the parish:

• Water quality in the River Lugg (part of the River Wye Special Area of Conservation) which runs through the parish.

- Flood plain of the River Lugg, limiting edge-of-village development opportunities to the south/south-west.
- Open and exposed landscape setting of the village particularly to the east, north and west limiting development opportunities on prominent and overly large sites.
- Lack of village services, facilities and infrastructure whose range and capacity will need to be improved before new development is to be contemplated. The school cannot expand unless the car park is bigger for both the Village Hall and the School. Public transport needs to improve significantly i.e., more than three buses a day.
- Volume of traffic through the village needs to significantly reduce.

# 2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

Sutton St Nicholas is no longer a sustainable community which is able to accept more "proportionate growth". The aims of the strategic policy are to "bolster existing service provision, improve facilities and infrastructure and meet the needs of the communities concerned" (Core Strategy policy RA2). But new development has proved to be a blunt tool for achieving these aims at village-level. Services in the village have declined not grown in recent years with the closure of the village shop and more recent reduction in bus services. There is no sign that recent development or promise thereof is having any effect at all on expanding or improving services, facilities and infrastructure. Rather, pressures and demands on the existing facilities have simply increased. New households continue to have to travel further afield generally by car to access day-to-day services. This generates more traffic on the unsuitable rural lanes which as explained above are also coming under increased pressure as a result of a lack of transport infrastructure around Hereford and the unintended consequences of development outside the parish. There is no sign that this situation is likely to change in the next 20 years particularly given that the Community Infrastructure Levy remains unimplemented. If yet more development is to be directed to the village in the Local Plan review, Sutton St Nicholas will be a less, not more sustainable community in years to come.



### Herefordshire Local Plan update – pre-consultation survey

### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

3. Are there any key planning policies that are missing from the current plan?

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

Yes, for most policies but devolving the allocation of land/sites and location of settlement boundaries is definitely not appropriate for some parishes. Tarrington is a good example of a parish where this has proved to be very problematic.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

We began the NDP in Nov 2013 and we are now at the examination stage. The whole NDP process has divided what was a very harmonious community; it has been a most upsetting experience. The housing development which is now taking place should make our community more sustainable. As for success, it will probably be another ten years before we can answer that.

### **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

Proportional growth in housing is planned for our parish. This is to be welcomed as it might help retain the services and facilities we have.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

To answer this question we need to be provided with a definition of 'sustainable'. The planned affordable housing should help to make our community more sustainable; time will tell whether this is the case.

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

Past developments have had little or no effect on the loss of services e.g. Railway Station, Police Station, Doctor's Surgery. Historically we had a very wide range of services most of which have disappeared; in all cases the size of parish and its population was not a significant factor. Our community has had little or no influence on the loss of services. It is almost inconceivable that a village School, Shop or Post Office will ever return. Past development and the increased population has helped retain some of the various clubs and groups etc. which form an important part of community life.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

Our parish has retained a Church, a Pub and a Community Hall. The Hereford / Ledbury public bus service is vital for some of our parishioners. Transport to and from local schools is a greatly valued service. The Hall is probably the only facility that is wholly owned and managed by the community and thus the only one we have full control of. Our village pub is for sale and its future is very much in the balance at the moment. We will be very reliant on Herefordshire Council policies and planning officers in order to retain the building as a public house. We probably already have the minimum services and facilities needed to support proportional growth.

### Future settlement hierarchy

- 1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.
- 2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.



### Herefordshire Local Plan update – pre-consultation survey

### General Questions

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

It is difficult to identify any successes due to the complexities and lack of definitive Policy hierarchies within the Plan. Additionally, there is little guidance (no definitive policy) on performance criteria and methodology of measuring the effective fulfilment of the contractual obligations by those responsible for managing the Plan objectives (such as HC Planning Department; Fastershire contractors and Balfour Beatty). The limited use of penalty clauses in contractor management by local government tends to ensure Plan failure.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

Definitive Policy hierarchy guidance should be included (as a specific Policy) to remove any ambiguity where one Policy can impinge upon, or appear to contradict another Policy (e.g. RA2 vs H2). An operational management policy is needed to ensure clear identification of those responsible for actions, and for the policing of those commitments/actions. Policies and Contracts without such controls will never be effective.

The contractual and financial consequences on HC contractors for failure to perform obligations or meet Policy objectives (e.g. being slow on prosecuting PROW infringements or failure to address ditch/drainage issues; or abandoning agreements over broadband improvements in the Golden Valley) should be clearly stated as KPIs (Key Performance Indicators), transparent to all (including the Public) and efficiently enforced. To ensure effective management, these KPI's should merit a stand-alone Policy of their own at the top of the hierarchy ranking.

3. Are there any key planning policies that are missing from the current plan?

Underpinning the planning policies should be a policy on 'Managing infrastructure expectations'. There is little clarity on what is covered and how issues are prioritised in the present Plan – a total lack of control.

For future sustainable lifestyles (and sustainable growth, where appropriate) it is important that rural areas are not ignored whilst all council effort is directed towards

Hereford and the larger towns and villages. The current lack of Policy control leaves the rural areas left behind time and time again, as improvements seem always centred on areas of larger population – a complete absence of any 'levelling up' within the county.

As well as stating the infrastructure expectations, reference should include using the HC legal and commercial leverage to encourage (or force, if necessary through by-laws) the Utilities companies to improve their provision of services. Large areas of the Golden Valley have limited broadband; very limited mobile phone coverage; and limited access to electricity supplies over 90 Amps to allow/encourage domestic properties to change from oil/LPG to all electric power, improving the region's carbon footprint to sustainable levels. One St Margarets resident was quoted £46,000 by Western Power to facilitate a 3 phase supply, despite the normal power line post being 6 metres from the house.

Ordinary residents or even groups of residents have little leverage on the utility companies – only a body such as the County Council, or Regional Government is in a position to apply pressure for change. Statutory controls on Utilities are focussed on charges/billing rules rather than provision of service. What use is it to residents when told that they can exit their contract without penalty if no other utility is willing to provide a viable service either? Where Universal Service Obligations do exist, they are so weakly managed that they become of limited use – such as the 10Mb/s threshold for broadband service. If readings show values in excess of this value, even just very occasionally, the property is treated as meeting requirements, despite being below the threshold value for 99% of the time.

Another key issue that warrants a stand-alone policy is for effective identification and enforcement of Planning and Policy transgressions. Currently enforcement is piecemeal and inconsistent, with penalties so low there is no real consequence for transgression. Penalties need to be swift and draconian. A fine of £250 for felling a tree is just 'part of a developer's business costs', whereas a fine of £250,000 will change behaviours immediately!

There also appears to be no Policy that recognises Climate Change, or what provisions to limit the damage should be incorporated into Planning decisions. A Policy to ensure sustainable building methods, with the inclusion of superior energy performance standards in new-build, conversion and renovation work, such as Passivhaus standard would be a good start. However, this should not be more important than the development being in keeping with the area in terms of design and location.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

We have seen little evidence of any notice being taken of the Neighbourhood Development Plans. Any authority for planning decisions is restricted to HC level, where the lack of definitive hierarchy between Policies and the lack of management control processes creates inconsistent planning decisions and limited follow-up checks. Some localised Parish Council authority on such decisions may be more effective and locally more consistent.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

For the same reasons as noted in Qu 1 & 4 it is difficult to identify any successes, but relatively easy to identify inconsistency and apparent abuse of planning processes. More authority to make local decisions on planning would help our ability to note any success and make the Parish Council more relevant to local residents.

### **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

The complexities and lack of hierarchy definition has created what we believe are poorly advised planning decisions, inconsistent decision making, and helped developers 'play the system' using long term 'stepping stone' changes of use of land and buildings, such as rebuilding a barn, then after some time changing to occasional holiday lets, then to full time holiday lets then to full residential status. This leads to 'new' residential buildings or commercial development in places where a direct request for such a building would likely be rejected by one interpretation of core Policy, but is eventually permitted due to the lack of definitive control.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

No. See answer to Qu 1 in this section and all in next section.

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

See also the answers to Qu 3 in General Section.

In such a rural area, there is limited feasibility for sporting or green space development, so PROW is one of the greatest assets for the wellbeing of residents. Policy E4 refers to improving PROW but there is no evidence of this, rather the reverse – frequent degraded status of paths by restricted access with fencing, obstructions, removal of signposts and inadequate maintenance of stiles/gates. The failure of some landowners to effectively address drainage issues from their land and ditches can make road walking a high risk option as well. We see very little evidence of any formal control or enforcement by HC or Balfour Beatty. The lack of a definitive Policy to manage the enforcement actions is the critical reason for failure.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

The key factors for supporting growth are those noted in General Questions 2, 3 & 4. It is vital that a Policy on the performance of the Utilities companies and HC service contractors is included to ensure that they cannot cherry-pick the easy work 'to boost productivity reports to HC' and ignore the more 'difficult (expensive) to access' options in rural sparsely populated areas. A decade of failure to 'level up' needs to be addressed.

Improved public transport facilities will be needed or have a Policy to limit penalties for car use into Hereford for those in outlying areas. The steep hills and blind corners of the Golden Valley road network, plus the drainage issues, make pedestrian or cycle use high risk particularly as many residents are elderly. High density population measures (such as cycle lanes and the public transport options enacted within Hereford) are only suitable to an urban environment.

Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Future growth is severely limited by lack of infrastructure and facilities, compounded by the lack of accountability for any improvements noted in earlier questions.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

No. As indicated in Qu 1 of this section, most community support facilities are situated well outside the area, such as medical facilities; retail and service providers; and transport links. Additionally, there are few sewage collection systems suitable for new developments and very limited utility services provision.

# Herefordshire Council

### Herefordshire Local Plan update – pre-consultation survey

### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

Locally knowledge and understanding of the Core Strategy is limited. There is a perception that the only function of the Strategy is to allocate housing developments within the County. It is useful to have the Local Plan Core Strategy (CS) Policies available in text for referral when considering planning applications etc. but in many cases the policies are too vague and idealistic.

**Policy RA1** - "Rural Housing Distribution" states *"The development of rural housing will contribute towards the wider regeneration of the rural economy"*. There is no explanation of how placing development in rural communities will benefit the "rural economy"! There is no evidence to show that people moving into the area will work for companies based within the parish or indeed the county.

Policies within the CS which would be reinforced in our NDP include **Policy RA2** - 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, **Policy SD1** – Sustainable design and energy efficiency to maintain local distinctiveness and ensure new development does not contribute to, or suffer from, adverse impacts arising from noise, light or air contamination, and **Policy SD2** – Renewable and low carbon energy generation.

**Policy RA3** seems to bring good protection to the rural places, however **criteria 6** seems inappropriate for open countryside. The use of open countryside should be better thought through and include more details of how to allow open countryside development that is regenerative and brings more benefits to the land and environment than not developing at all. For example rewilding, carbon sinks, rural crafts and community businesses.

<u>"RA3 Criteria 6.</u> - is of exceptional quality and innovative design satisfying the design criteria set out in Paragraph 55 of the National Planning Policy Framework and achieves sustainable standards of design and construction;"

The Following policies provide support to development where needed in rural economies, whilst respecting the need to protect AONB and important heritage sites; **Policy RA4** - Agricultural, forestry and rural enterprise dwellings along with **Policy RA5** – Re-use of rural buildings, **Policy RA6** - Rural economy and **Policy E4** – Tourism.

**Policy E3** – Homeworking, respects the peace and tranquillity associated and expected within rural settlements in that these developments should "not adversely affect the amenity of the neighbourhood by any of......• noise disturbance from the use or any increased traffic and parking generated; • unsociable hours of operation; and • the storage of hazardous materials or emissions from the site.

**Policy H2** - Rural exception sites, fails to make mention of impact on AONB or dwelling densities in rural settlements where connectivity to mains drainage and increases to traffic on single track roads is an issue.

**Policy ID1** - "Infrastructure Delivery" fails to give any support to the needs of rural communities where the developments are of a size which would not call for S106 or CIL monies to be payable yet the total development growth percentage remains the same as other communities.

The following policies recognise the importance of conserving AONB and conservation areas, and retention of important trees and replacing green infrastructure, retention and protection of nature conservation sites and habitats, and important species therein. All very important with our climate change crisis; **Policy LD1** – Landscape and townscape, **Policy LD2** – Biodiversity and geodiversity, and **Policy LD3** – Green infrastructure.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

The policies related to the Rural Housing Strategy do not work well in a parish that has a highly distributed, ageing population with very limited local facilities. The concept of 'proportionate' development does not fit well when the named settlements for such development actually comprise a number of separate groupings of dwellings rather than single, integrated areas. We need policies that are more sensitive to the lack of local infrastructure and recognise that it is not sustainable to allocate more development into areas that have few essential services such as access to public transport, mains drainage and a reliable electricity supply.

More consideration should be given for accessibility. For example, our topography of steep hills with small single track roads, makes our parish unsuitable for much development. The assessment of each parish for **RA2 or RA3** development should be revised taking account of practical matters in the parishes like the provision of water and sewerage infrastructure and lack of useful bus transport.

The whole strategy must seriously address the climate and natural emergencies that national and local government has declared. Within this it is missing measures to reduce travel patterns by developing areas which have ready access to services and not relying on cars to get to those services. In the situation where personal transport is less widely available then proximity to services and the use of public transport systems must dictate housing development location. The strategy should not have a climate section of policies, but should have climate policies embedded throughout the document in every policy. The same goes for pollution and flooding impacts. We cannot go on allowing development where it will impact people or the environment, we have to face up to the fact that more houses means more impact and yet there is less land that is suitable because of the increased (and increasing) flooding, pollution and environmental impacts.

**RA2** settlement hierarchy talks about proportional and proportionate, however there is no definition of what those terms mean. It would be clearer to both planners and members of the public who want to comment on applications if there was a definition of what those terms mean.

**RA3** is generally good but the use of open countryside should be better thought through and include more details of how to allow open countryside development that is regenerative and brings more benefits to the land and environment than not developing at all. For example rewilding, carbon sinks, rural crafts and community businesses.

**RA5** re-use of agric. buildings ... good generally but repetitive./.the text could be sharpened.

**RA6 4.8.43** The Malvern Hills and the Wye Valley AONBs should be protected more as indicated in the latest NPPF guidelines.....but again the recommendations in the CS Policy should be stronger.

More consideration should be given to how S106 / CIL monies can filter through to rural parishes where developments are smaller in nature due to the settlement's characteristics. More support for infrastructure in rural communities where the developments are of a size which would not call for S106 or CIL monies to be payable.

More consideration or guidance on minimum densities and spatial planning in rural areas should be stipulated bearing in mind the lack of mains drainage in rural settlements.

3. Are there any key planning policies that are missing from the current plan?

As Climate Change and the impact on wildlife habitat becomes more acute we need more emphasis on fully sustainable development. The terms 'sustainable' and 'proportionate' need more definition within policies. Currently they are entirely subjective and the application of these terms varies quite widely when looking at individual proposals. There should also be more consideration given to matters such as light pollution in rural areas, especially within an AONB.

Ancient woodland protection NPPF quotes "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable

compensation strategy exists" however applications are not scrutinised under this policy within the CS and applications are routinely approved without reference to the impacts on ancient woodlands either by the applicant or the planning officers (example P174178/P202184 where the woodlands are being directly damaged by developers.).

Climate, environmental, pollution and flooding impacts. Developments that pollute the land and rivers should be given no weight and developments that regenerate land should be given the highest weight.

One Planet development. In a climate and environmental emergency regenerative land use should have the highest weight in development policy.

Farming and energy infrastructure policies that protect the environment and habitats.

Yes...restrictions on intensive development in rural areas (i.e. large scale polytunnel developments and intensive poultry / pig units with the associated living accommodation. The large scale polytunnels are intrusive in the open countryside, especially now that the soft fruit is grown in suspended channels ('table top') and does not need to be grown in the soil of good agricultural land. These intensive developments should be much less dominant in the open countryside whether in designated protected areas or not. Where there is intensive farming there should be a "whole farm plan" looking at the site as a whole and green corridors should be implemented.

It is stated in the SPG (Supplementary Planning Guide) that resulting flooding should be avoided and residents' amenities should be protected, and polytunnels need to have non reflective coverings. The SPG should become an SPD (Supplementary Planning Document). Planners should be aware of the topography In areas where these developments are overlooked from higher ground.

Associated with the intensive growing practices are the workers' accommodation units. These are often called 'seasonal' but in fact the mobile homes/caravans stay throughout the year on sites in the countryside without a requirement for permits/licences. It is believed that Council Tax is not levied on this type of accommodation.

Advice in the June 2018 SPG Polytunnel Guidelines should be stronger and restrictions included in CS **RA3 and RA4**.

The relevant policies in the Wye Valley AONB Management Plan should also be much clearer and stronger in protecting the landscape of the AONB.

**Policy SD1** – Mentions light contamination very briefly but does not go far enough. Light pollution is a serious issue which we feel warrants a stronger policy. Perhaps a policy could be added to cover noise, light and air contamination / pollution. Dark Skies Policies should be introduced and compulsory.

Policies encouraging creation of woodlands.

Policies to include spatial planning, i.e. Plot sizes to enable home grown food and allocations for small holdings. Research in the 1970s by John Jeavons and the Ecology

Action Organisation found that 4000 square feet (about 370 square metres) of growing space was enough land to sustain one person on a vegetarian diet for a year, with about another 4000 square feet (370 square metres) for access paths and storage – so that's a plot around 80 feet x 100 feet (24m x 30m). Ref:

https://www.growveg.co.uk/guides/growing-enough-food-to-feed-a-family/

With climate change upon us and the impact of Brexit (.. the move to a closed service economy), planners and strategists to develop/consider/create **'agri-hoods'** in rural communities ... "An **agrihood** is an organised community that integrates agriculture into a residential neighbourhood. The purpose of these communities is to facilitate food production while at the same time providing recreation for members of the community". **Ref:** <u>http://agrihoods.net/</u>

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

We understand that the general scope of an NDP is defined at government level within The Neighbourhood Planning (General) Regulations 2012. Therefore the purpose of this question is unclear, but here are some suggestions.

Flood risk management is guided mainly by the EA floods risk maps, however the risks can be very specifically local and this should be devolved better to an NDP.

Definition of major development is not clear in the Wye Valley AONB and this could be devolved to local NDPs to reflect local scale and character of developments.

Definition of sustainable settlements and ecologically important areas and sites should be devolved to NDPs because local conditions change over time and local knowledge of the ease of access to services like buses and shops are better than at county level planning. We have to reduce the use of cars and so this can be very effectively done in local communities.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Our plan is currently at Regulation 14 draft stage. It has taken 9 years to get to this point and has, at times, resulted in some vigorous and, on occasions, acrimonious local debate.

We have seen that Herefordshire Council take into account details within a draft NDP once it has been received at Reg 14 Stage. This has illustrated the importance of producing a NDP to highlight local views and issues.

### **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

The current flat distribution of growth targets, across the Ross HMA, takes no account of the topographical limitations within individual parishes. This parish mainly comprises small groups of dwellings that are widely dispersed. The 3 settlements named in Policy RA2 are actually broken into 7 distinct groupings separated by open countryside. The parish is poorly served in terms of the local road network and has few facilities to support additional housing and population. There is no perceived local need for additional housing within the parish. There seems to be little prospect that any flat rate proportional growth will result in new facilities and will just increase the likelihood of rural isolation as a result of the dispersed nature of the local population.

The original proposal to develop housing around population hubs where a more sustainable pattern of development would benefit people as well as the planet.

The use of a scoring system to define settlements which could be considered sustainable has resulted in one settlement, Howle Hill being included in table 4.15 when it has no services at all and is not readily accessible by anything other than private motor cars.

The Core Strategy has a two tier hierarchy i.e. Table 4.14 has Walford (Coughton) and Table 4.15 has Bishopswood and Howle Hill, yet the % of growth is for the parish as a whole.

Following the rules of producing a NDP this has produced all of the allocation within the NDP draft being situated within one of the smaller settlements in Table 4.15. This although proportionate for the parish as a whole is far from proportionate to the settlement size.

This brings unsustainable pressure on small settlements where there are only single track roads with no pavements or street lighting, and no public transport.

The allocation of 14% growth to sprawling rural parishes has no recognition of how sustainable this is.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

No. In respect of Walford Parish there are 3 named settlements, one of which has no facilities whatsoever and the other 2 are poorly served. Development since 2011 has had

no positive impact on local sustainability and during the period 2011 to 2021 the Parish has actually lost local services in terms of public transport. The majority of new development has occurred adjacent to the 3 settlements, or in the 'open countryside', remote from any services including mains drainage. It merely spreads the housing development across the countryside in an unsustainable manner, without reference to where the services are and where the people would like to be to reach those services.

**Policy ID1** - "Infrastructure Delivery" fails to give any support to the needs of rural communities where the developments are of a size which would not call for S106 or CIL monies to be payable yet the total development growth percentage remains the same as other communities.

The allocation of proportionate growth by parish instead of by settlement can result in over allocation in small settlements. If there is no difference between the two tables 4.14 and 4.15 in terms of growth then it negates the need to have two tables.

Walford parish has 3 settlements, 1 in table 4.14 and 2 in table 4.15, with the majority being accessed by single track roads with no pavements or street lighting. RA2 requires the parish to build more housing in or adjacent to these which increases the density of building. Two of these settlements have no access to mains drainage yet this is where suitable and available land has come forward for building. This in turn dictates the area needed to facilitate drainage by other means so plot sizes need to be larger. Therefore making proportional growth of these named settlements unsustainable.

## Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

No. Since 2015 when the Core Strategy was adopted we have lost services and facilities, primarily reductions in the frequency and routes for public transport. Past regular bus services have been removed and many areas do not have mains drainage despite increasing numbers of planning applications. Pavements do not exist in several areas, or are inadequate as regards width, even along the B4234, despite housing developments.

There is a thriving Primary School but a local Pre-School Playgroup closed when younger children (from age 3) were able to attend the Primary School 'kindergarten' classes and attend for longer sessions.

The fact that **Policy ID1** - "Infrastructure Delivery" fails to give any support to the needs of rural communities where the developments are not of a size which would call for S106 or CIL monies to be payable, means that no new services will be provided through these means.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

The local road infrastructure has very limited capability for safely sustaining any significant development that is remote from the only B class road within the Parish. However parishioners have expressed extremely strong views against any significant new development adjacent to this road. The parish has very limited access to mains drainage and with 75% of the Parish being within the Wye Valley AONB and also within a Nitrate Vulnerable Zone drainage/surface water flooding is a major consideration.

- Investment in bus services that entice people away from their cars. Like park and ride into - carless cities.

- Mains drainage in outlying rural areas

- Reinstatement of Post Office and shop; there is one at Bishopswood but that is a long way for Walford people without their own means of transport.

- Better/wider pavements.

- Local shops or food hubs utilising facilities attached to village halls.

- Investment in Electric Vehicle Charging Points with the growing climate crisis.

- Investment in healthcare; A local centre with Dr's surgery, Dentist and Chemist would alleviate the growing pressures on facilities within Ross-on-Wye with the large housing estates being erected there, and enable our aging population to obtain appointments.

- Allotments and spatial planning to enable home grown produce.

Ideally there should be enough land around a property to 'grow your own' - Research in the 1970s by John Jeavons and the Ecology Action Organisation found that 4000 square feet (about 370 square metres) of growing space was enough land to sustain one person on a vegetarian diet for a year, with about another 4000 square feet (370 square metres) for access paths and storage – so that's a plot around 80 feet x 100 feet (24m x 30m). Ref: https://www.growveg.co.uk/guides/growing-enough-food-to-feed-a-family/

With climate change upon us and the impact of Brexit (.. the move to a closed service economy), Strategists should develop/consider/create 'agri-hoods' in rural communities ... "An agrihood is an organised community that integrates agriculture into a residential neighborhood. The purpose of these communities is to facilitate food production while at the same time providing recreation for members of the community". Ref: <u>http://agrihoods.net/</u>

## Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

The parish has only very limited access to mains drainage and any significant development in that area has been opposed by a large proportion of parishioners. The majority of the parish is served by narrow country lanes which represent a significant hazard for all travel, other than by motor vehicle. These lanes can often become impassable due to snow, ice and surface water flooding, which is a significant risk to older residents. There are very few local facilities which means that the majority of the local population have to travel, using private transport, to Ross on Wye, Monmouth or Cinderford for most essential services and shops. The main route into Ross on Wye, the B4234, is a recognised traffic 'bottleneck' where it enters the town. 75% of the parish is within the Wye Valley AONB, much of the parish comprises steep, wooded hillside within the water catchment of the River Wye and thus poses both a pollution risk and is the subject of significant surface water flooding events.

Bus routes only run along the B4234 and difficult access to the B4234 for the hill dwellings. Plus limited usefulness of a lot of the land along the B4234 because of increasing flood risks; e.g. along the B4234 on land opposite Walford Village Hall (from the River Wye). Also in areas around Coughton/Castlebrook stream.

Our parish is made up of steep hills with single track roads and no pavements (with the exception of the B4234) with a growing aging population, many of whom have difficulty accessing facilities.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

No. Due to the reasons given for the answers to the questions on the suitability of policy **RA2** and sustainability except along the main road, the B4234, but that would create 'ribbon' development.

The topography of our parish mentioned above and the lack of any village centres, shops or communal areas, and only a skeleton public transport service means our area is not a sustainable community for proportionate growth. What is meant by proportionate?

### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

The Core Strategy/Local Plan is a long, complex document and clearly fundamental to the successful growth of the county but its successes (and failures) overall are, in our view, difficult for a specific Parish Council to comment on as understandably we look at things at a very parochial level. However, where it is appropriate we have commented at a local and general level.

**Important to note:** Both the new Local Plan and NDPs are intended to be long-term documents but in today's fast changing world even 5 years is a long time. Both the Local Plan and NDPs need to have the facility to expect the unexpected and be able to respond to it.

### Local:

We have concerns – and know we are not alone in this – that the methodology of deciding growth targets is potentially flawed and that the algorithm basis used has not been universally acceptable. We would be classed as a hub or tier 2 settlement under the original Rural Settlement Hierarchy Background paper. We were able to cope with our 18% growth target but times have changed and a less 'corporate' approach and a more localised one is essential as you will see as you read on.

### General:

Strategy has limited effected in practice (e.g., SS7 climate change). A successful plan requires realistic policies to back up the strategy – to reach a destination, a route to get there needs to be defined.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

### Local:

More consultation at initial stages at Parish level especially as regards allocation of housing targets – no one understands better than Parish Councils the needs/wants/aspirations/restrictions that communities face and a 'one size fits all' approach does not work – we refer specifically to the blanket percentage allocation of new housing.

### General:

As above, actions that are considered realistic need to be defined (e.g.: stating 'improved transport links' without defining what that means and providing examples of steps to achieve the purpose makes it meaningless.

3. Are there any key planning policies that are missing from the current plan?

#### Local:

Given the devastation caused by Storm Dennis (and others) any policies regarding flooding and mitigation need to be able to be implemented in conjunction with local knowledge rather than at a county-wide level

### General:

Assessment of the impact on the county of changes from high street retail to deliverybased logistics.

The impact of working from home on housing and planning decisions (e.g., home offices, business rates, conversion of existing office spaces) communication and transport links.

A realistic and active view of the impacts of moving towards carbon neutral (e.g., transport, district heating, house construction, agriculture.

Impact of actions to meet SAC and SSSI goals, sewage treatment, water sourcing, fertiliser run-off.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

### Local:

They worked last time – apart from the blanket percentage approach (which worked in our parish but may not work again).

We are already aware that any new NDP which we produce has to take a view on industrial/commercial activities in the Parish (e.g., garden centre, quarry, nearby trading estate businesses' mineral deposits etc.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

**Local:** Yes, it has been a success as we have not been plagued with unwanted development proposals and it has been gratifying to see the NDP mentioned in officers' reports. However, there was huge concern as the NDPs started to lose weight and relief when the housing land supply bought it back to full weight.

#### General:

NDPs across the county were put at risk by the failure of Herefordshire Council over housing land supply and potentially over-estimated housing numbers. That had not been anticipated. A new plan needs to identify if there are other factors that might come into play in the future which could have a similar impact – e.g., failure to meet energy targets, a slow rate of change to electric vehicles or failure to sort out the River Wye SAC.

### **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

#### Local:

With housing approvals already 'in the bag' at the time of the Core Strategy requirement on housing numbers was set, we were able to have controlled and modest development resulting in organic development for the parish. It also enabled us to ensure that unwanted developments outside of the settlement boundary did not happen. However, see comments above regarding potential for situations outside of our local control.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

**Local:** It is difficult to answer that question as we can only look at the position from our own settlement. We are concerned that percentage proportional growth if applied again in the new iteration of the Core Strategy will not be sustainable especially to flood hit communities such as ours. See also earlier comments.

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

#### Local:

Development has enabled our village shop and post office to remain viable but we no longer have a pub/restaurant as the community could not/would not support it as a viable business. Currently there is an attempt underway to buy the (closed) village pub as a community venture but an application for match funding via the Government scheme has failed..

The village school roll has been diminishing as parents made other choices but a merger with a Leominster school may have put that back on a better track.

Broadband has been improved in some areas changing the viability of working from established premises.

On a negative note, the sewage treatment facilities remain constrained, our highway drainage system is poor (although due for some investigative work in the latter part of 2021) and we have a U road used as a bus-route and by heavy farm traffic that we cannot get surface reinstatement considered by BBLP.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

### Local:

We need to ensure that our village school is maintained, the shop is vital to the community and the attraction of a pub/restaurant helps to raise awareness of the community.

Maintenance of our bus service between Leominster and Hereford is absolutely essential; and improvement in timings and frequency would be welcomed to help break the dependency on car transport.

Improved safety including reduced speed limits and junction safety on the A49 trunk road which skirts the village but bisects the parish will enhance its attractiveness as a place to live.

We have little or no real commerce or industry to speak (se earlier comment re any future NDP) and do not envisage any major changes - we are keen to maintain the rural aspect of Wellington parish.

The A49 provides the ability for ease of moving around BUT there is no safe cycle route in either direction which we see as essential to cutting motor vehicle use. And on that same note, Council funded electric vehicle charging points in villages will help towards the carbon neutral aims.

More stringent rules and regulations on developers to create energy efficient homes should also be introduced.

Communities like ours has sufficient 'executive 'style homes and to keep our village alive we need to be able to provide smaller, and so cheaper, accommodation to attract young people and also to ensure that our less able residents can continue to live safely here.. This does not necessarily mean 'affordable accommodation' in the currently accepted understand of the phrase – i.e., only available to those on benefits. We have young people who can afford a realistic commercial rent but are precluded from renting as 'they both have jobs' – that maybe so but raising a deposit to buy is becoming impossible so there needs to be a re-think on housing policies to create a better mix of tenures.

For older residents, we need buildings suitable for independent living and/or sheltered accommodation and buildings that are less vulnerable to flooding and more resilient should that happen.

## Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

### Local:

Yes most definitely – over 50 homes in the main village and 10 in the nearby hamlet were flooded as a result of Storm Dennis. A watercourse runs through the heart of the village and even with mitigation measures we know we cannot stop it from flooding. We do not need any more concrete on the ground- we need water to be able to soak away. As already stated the capacity of stormwater drainage systems and sewage treatment are insufficient.

The designation of the A49 as a major trunk road (and so in the hands of Highways England with whom negotiation is difficult) with its commensurate high speeds heightens the accident risk for adjacent housing and makes cycling access/egress to the village problematic (downright dangerous!).

Additionally, it needs to be remembered that within the parish or on its close borders there are sites that are designated as SSSI's as well as other sensitive sites: these include the lakes at the Tarmac quarry, the proposed Oak Tree Farm wetland project, the River Lugg SSSI, Dinmore Woods SSSI, Queenswood Arboretum, the River Wye SAC and Bodenham Lakes.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

The subject of proportional growth is referred to in earlier answers – and the situation needs to be looked at in relation to the response regarding flooding as above.



#### General Questions

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

Incorrectly listing Welsh Newton Common as appropriate for development under RA2. Has caused deep social divisions and possible future legal actions.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

To make current sweeping policies better able to reflect differing needs of different parishes.

RA2 – Needs to be accurate.

A more flexible attitude to changing circumstances or inaccuracies such as RA2 would ensure information is relevant and prevent worry and concern.

3. Are there any key planning policies that are missing from the current plan?

Intensive livestock policy

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

Having incorrectly listed Welsh Newton Common under RA2, there is little room to allow NDP to rectify this.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

It has been correctly used in planning determination at local and appeal levels. It gives Parish Cllrs a formal structure to work to when making planning comments. Unfortunately being used alongside an inaccurate core strategy RA2

### **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

Devastating. Community socially divided now Possible future legal actions Should be listed under para 6.8 of rural settlement hierarchy paper 2010

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

Damaging in the extreme No development of facilities or infrastructure has followed

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

## No change Almost no services in two parishes

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

Llanrothal Road has been closed for over a year, causing parishioners and visitors large detours. This has not been seen as a priority by Highways and it will be over a year before it is scheduled to reopen. Good thing the road doesn't lead to the brewery!

Better highway infrastructure in rural locations must be prioritised including highway drainage

Broadband solution needs to be found following the lack of progress with Gigaclear

There are minimal community facilities following the closure of the parish post office some years ago and limited support around a mobile post office.

An improved public transport network

Welsh Newton Common is only served off a single road access and not suitable for further development without highway improvements on visibility/passing places

Better communication between Parish Council and appointed contractor and Herefordshire Council

### Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

No facilities Very rural Poor highway infrastructure Poor public transport Divided community spread over a large rural area with none of the usual amenities.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

No for the reasons stated above.



#### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

There is insufficient weight given to protecting the landscape, the historic character of buildings and their setting. Similarly, in relation to the need to protect the residential amenity of residents and the importance of highway safety. While there are policies that refer to such matters, the over emphasis and weight given to new development has sometimes prejudiced these aspects.

New development is necessary but constraints need to be incorporated to ensure that such development is more sympathetic and complimentary to the existing built environment and landscape.

Further, we have experienced several examples of decisions by planning officers which are completely out of touch with the needs and concerns of local residents. A more devolved decision making process would be welcome and / or additional weight given to the views of Parish Councils. It is axiomatic that the views and aspirations of distant planning officers and large developers are rarely motivated by the concerns and needs of the local community.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

See above. Also certain of the proposals enshrined within the current Government Planning White Paper dated August 2020 would be welcome.

See in particular - the need to increase protection for historic landscapes, green spaces and agricultural land. Further, for Neighbourhood Development Plans to play a crucial role in producing required design guides and codes to provide certainty and reflect local character and preferences about the form and appearance of development. 3. Are there any key planning policies that are missing from the current plan?

See above.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

There should be a significant increase in devolution of both policy and decision making.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

A limited success – planning appeals have referenced the same and often given weight to the policies. However, given the underlying premise of such plans has had to be to encourage development, there has been insufficient ability to define more clearly areas that should be protected. Similarly, in relation to the importance of protecting residential amenity.

# Current Core Strategy settlement hierarchy

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

In the context of Whitbourne it is misplaced and too generic. We have few local amenities, no school and poor public transport links. In so far as the current hierarchy encourages significant new development it will simply serve to encourage a car-based satellite commuter settlement which clashes with the historic fabric and landscape, degrades and reduces our agricultural land and green spaces and where many new residents seemingly have little interest in being a part of the local community, e.g. the Ardley Meadows development.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

No-see above.

Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

No – see above.		

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

Better public transport infrastructure, improved and wider road system, new primary and nursery schools and additional pub/ restaurant and shopping facilities.

## Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Lack of facilities as referred to above together with a critical need to protect the historic landscape, agricultural land and existing historic buildings.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

No – see above.

### **Neighbourhood Planning Team**

From: Sent:	clerk@wigmoregrouppc.co.uk 14 January 2022 08:26
То:	Neighbourhood Planning Team
Subject:	RE: Herefordshire Local Plan update - pre-consultation engagement

**Categories:** 

Blue Category

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 Neighbourhood Planning team

Wigmore Group Parish Council considered the consultation at its meeting 10 January, and resolved not to respond. Thank you.

Maggie

Mrs Maggie Brown Clerk to Wigmore Group Parish Council Email: <u>clerk@wigmoregrouppc.co.uk</u> Web: <u>www.wigmoregrouppc.co.uk</u>



### <u>Response from Withington Group Parish Council</u> General Questions

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

The main concern is increased housing numbers.

If an aim is to 'bolster existing service provision, improve facilities and infrastructure and met the needs of the communities concerned' (RA 2)

Then on this criterion the Core Strategy is not successful in the Withington Group Parish Council area. Despite providing over a third more of the required total housing we have not received any improvement in facilities or infra structure.

The strategy are too light, there are too many open conflicts.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

Allocation of housing numbers!

All villages surrounding the city are being faced with enormous pressure to build more housing. This is creating bottlenecks on specific roads and overloading rural lanes. Simply building houses does not produce a sustainable community

'Local evidence and environmental factors will determine the appropriate scale of development (RA 1) seems to have morphed into build wherever and ignoring the need to balance social, economic and environmental factors. House are built where there is no employment, public transport or shops. Creating dormitory villages does not aid social cohesion

NDP's were supposed to give local communities greater say in planning but they appear to have been used simply to find housing.

3. Are there any key planning policies that are missing from the current plan?

- Dark skies are a valued aspect of rural life. In our Group we have recently had houses built with exterior lighting that is causing upset to local residents.

A policy to deal with this would be of benefit. Issues are light pollution, bat corridors.
Solar.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

Aside from housing issues the ability to define settlement boundaries and designating Local Green Space has been welcomed.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

We do have an NDP.

Most housing was pushed through before its adoption.

The appeal for housing at Southbank (200207/0) was partly dismissed because of the settlement boundary, but also phosphate issue.

We were angered that p200680/f was grated permission as this was for development adjacent to the settlement boundary. (Preston Wynne)

Application p214030 is for a dwelling outside the settlement boundary for Westhide. We would hope this is refused.

Policies RA2 and RA3 should be re worded to clarify that land outside the settlement boundary, even if adjacent is effectively open countryside.

To allow development on adjacent land makes no sense.

The NDP has had little impact on enhanced service/infrastructure provision.

## **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

Aside from issues already discussed with Withington, the hierarchy has brought Westhide and Preston Wynne into the purview of growth .This is ridiculous as these are settlements almost completely without services. Westhide has 1 bus a week- hardly supporting sustainabe travel!!.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

NO - as already discussed.

Withington has seen an enormous growth in its population. Via s106 some improvements have been made to the village hall/playing fields. Had the LA used CIL, money would have n been available to provide services that could help gel the larger community. Specially looking at youth provision.

Whist not a planning issue, the continued reduction of rural bus service is a major concern and one that works against the climate emergency.

## Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

Village shop closed some over a year ago. It is about to re-open. Hopefully the increased population will make this more sustainable.

There is now no bus service after 6 from Hereford for those trying to come home from work.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

As Withington has experienced a period of rapid expansion beyond the numbers required, we feel no growth should occur within the existing plan period. There is a site in Westhide that might well come forward in the next few years. We would hope that the principle of proportionality is applied along with strong consideration of impact on local infrastructure

### Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Poor water quality. Phosphate in the Lugg. No public transport.

Maintain sustainable communities

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

No! as already discussed

## **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

The local perception of the core strategy is that it is to provide more houses, while neglecting to consider their effect on the infrastructure of remote parishes.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

We think more consideration should be given for the accessibility of new homes. For example, Woolhope parish may appear to be close to centres of population like Ross on Wye. However its geography, steep hills, narrow valleys, small roads, makes it unsuitable for much development. The assessment of each parish for RA2 or RA3 development should be revised taking account of practical matters on the ground in the parishes. Practical matters should access the lack of useful bus transport, and the provision of water and sewerage infrastructure.

3. Are there any key planning policies that are missing from the current plan?

Many come to the parish for holidays. What is valuable about the parish as a tourist destination should form part of the parish plan. What is valuable includes footpaths, cycle paths, unique views which should be protected – the aesthetics and amenity of the parish. "Enhancing while conserving".

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

Sorry, we don't understand the question

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Not yet. However 'windfall' planning applications have been fulfilling our housing quota on an organic basis. These are subject to all the ordinary planning constraints, the consent of neighbours, et cetera, and have worked well so far, producing varied new housing on sites scattered throughout the parish, with no untoward pressure on the infrastructure in any one place.

### **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

If by "settlement hierarchy" mean the Woolhope RA3 practice of windfall planning applications, all the windfall planning applications that have been granted have been approved by the Parish Council, by the community, and are producing a more varied type of housing scattered throughout this large parish.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

Woolhope parish is the largest parish east of Hereford, albeit one of the least accessible, and has much scattered housing with only a small village relative to the total number of houses in the parish. RA2 would require the parish to build more housing close to the village which would nearly double the number of houses in the village, even though the number of new houses built there would constitute only 14% of the total number of houses in the parish. So the proportional growth of named settlements – doesn't really work for the Woolhope village.

## Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

No new services have been supplied to the parish during the currency of the present core strategy. In fact the bus service has been reduced which is impossible to use – it leaves less than an hour in its destination at Hereford before it returns. The parish questions its effectiveness. However the parish is now seeing some roads being repaired, but not upgraded, since they were so damaged by the diversion of traffic from the protracted closure of the B4224.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

Occasional 'windfall' growth could be sustainable provided that assurances are given by Welsh Water that confirm the provision of water and sewerage processing in the village. The appropriate septic tank provision should also be confirmed due to differing soil types and stream run off. It is also vital that transport access can be managed at the distributed sites

## Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Any new development in the Woolhope parish, which is so isolated, needs to account its geography. This was completely lacking from the recent core strategy. The geography is awkward – in a bad winter the only passable road level route out of the village is a narrow road through to Fownhope.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

The fragility of the infrastructure in the parish has been shown by its testing last winter with the informal diversion of the B4224 thorough the parish. Further the opinion is that the parish should not expose its informal charms to change and development. So no street lights, or pavements. Please don't destroy what makes Woolhope a charming place to live in and visit!



#### **General Questions**

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

In general terms the policies are considered to be successful. However, the application of Policy RA2 with regard to the interpretation of settlement boundaries has limited development opportunities, see below. As has the requirement for 10 or more houses in a development before affordable housing becomes mandatory.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

The Core Strategy policies for rural settlements includes support for urban style development with houses positioned closely together on small plots which can become the default choice. This does not fit with the majority of historical housing in Wyeside or the preferred NDP "best practice" model of widely spaced houses on larger plots with footpaths through housing clusters.

'The River Wye confers unique gifts to Wyeside Parishes – rich farming soils and a hugely beneficial wildlife corridor as well as the opportunity for eco-tourism. We would ask that greater priority is given to policy SD4 in the hierarchy of policies and that the new Local Plan reflects the terrible pollution issues the river is facing from both phosphates and nitrates.'

3. Are there any key planning policies that are missing from the current plan?

Paragraph 63 of the 2018 NPPF confirms the Affordable Housing threshold as **10 or less dwellings** or a combined floor space of 1,000sqm, with *an optional lower threshold of 5 or less dwellings in designated rural areas. This option has not been applied to Wyeside.* 

**New policies required to address**; the increasing Hereford traffic congestion is a concern and new policies are required to address this, as the Hereford Western by-pass has been cancelled; fragmented bus services in rural areas; the recently adopted Climate Emergency, particularly as it relates to the management of agriculture in rural areas; carbon neutral housing; adoption of more sensible "eco-friendly" regulations for listed buildings; and regulations to reduce River Wye pollution levels. It is understood that HC is addressing some of these concerns as it relates to Farming and the Water Companies, however new planning policies are necessary to support any improvements.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

Policies for Wyeside specific rural characteristics have been successfully applied which suggests the NDP is operating at the right level.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

NDP policies requiring developments to avoid urbanisation and reflect current housing types, characteristics and large garden sizes appropriate to the rural nature of settlements has been a success.

### **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

Wyeside is on target for meeting the proportional growth of 39 new builds by 2031, with some 27 in the pipeline for planning submission/approved/under construction/completed. However, over 50% of these new builds are located in one village, Preston on Wye, which has narrow single-track roads on every access route. Underperformance by three of the villages against growth targets is in part due to the smaller village centres reducing opportunities for development, in spite of each being accessed by a "B" road.

None of Wyeside's five villages had settlement boundaries prior to development of the NDP and their application under the terms set out in Policy RA2 extract: "*and new housing located within or adjacent to the main built-up area*" has created difficulties of interpretation and may have constrained development opportunities.

Bredwardine, Blakemere and Tyberton village centres all have scattered village housing interspersed with fields which make it difficult to capture a village centre within an easily identified **"main built-up area".** Thereby reducing potential development opportunities in areas that have historically been considered part of the village. Leading to a single house development failing to get approval in Blakemere, which may have been approved prior to adoption of the Core Strategy and NDP.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

It is too early to tell whether there will be any improvement to sustainability at Preston on Wye and Moccas. No improvement is anticipated for Bredwardine, Blakemere and Tyberton due to little or no new builds. However, the lack of workable 106s Community Infrastructure Level (CIL) funding arrangements for small developments is a retrograde step for the future sustainability of rural areas such as Wyeside.

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

No change to currently very limited facilities and services.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

If the recent demand for rural housing by professional people who can work remotely from city offices continues improvements in facilities will be required including; access to better transport; recreational areas; community facilities, including community shops; broadband; better road access by widening narrow single-track lanes; better access to health services; action to address unreliable electricity supplies in Preston on Wye.

#### **Future settlement hierarchy**

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Poor employment prospects and higher costs of living in Wyeside's rural areas with no credible public transport and lack of facilities as set out above other than the three village halls and two pubs across the five villages.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

Long term sustainability is at risk across the five villages due to the lack of facilities set out above, few employment opportunities and poor access to employment elsewhere.



#### General Questions

1. What elements of the strategy and policies in the current Core Strategy do you consider to have been successful or not? Please explain the reasons for your answer.

Generally, the CS is clear. However, there sometimes appears little logic in the areas identified for potential development where this can appear to be more about postcode rather than areas that actually make sense.

2. What elements of current Core Strategy policy could be improved? Please explain the reasons for your answer.

More attention to sustainability and adequacy of infrastructure.

3. Are there any key planning policies that are missing from the current plan?

As above. Planning applications should be forced to address sustainability considerations which should then become part of any approval. Currently, a developer does not even have to say what type of heating is to be installed into a property.

There should also be a more rigid attention to landscaping such that a developer cannot wriggle out of its commitments once approval has been given

Too much is being left to be sorted out by the Enforcement team after the event which is wrong. Many developers know this and are getting out of meeting their obligations.

4. Are the policy areas that are devolved to Neighbourhood Development Plans at the right level? Please explain the reason for your answer.

Yes. However, plans should only be overruled by Planning on an exceptional basis to prevent them having reduced weight. Developers sometimes treat NDP's with disdain and are quick to capitalise on any weaknesses. They must be as tight as possible without ambiguity.

5. If you have an adopted Neighbourhood Development Plan, do you consider it has been a success? Please explain the reasons for your answer.

Yes, though we have been tested by a number of developers both large and small looking for loopholes though these have most often been unsuccessful. In doing a plan again we would be more specific about settlement boundaries and what can be built where. We would also say more on affordable housing and traveller communities and be rigid about commercial development potential.

## **Current Core Strategy settlement hierarchy**

1. What impact has the current settlement hierarchy had on your parish? Please explain the reasons for your answer.

It has caused confusion. Nobody can understand for instance why Monkhide is considered suitable for proportionate growth when it is actually less suitable than Yarkhill itself which is designated rural and therefore unsuited to development. A number of developers have tried to take advantage of the hierarchy to develop where unsuitable.

2. Do you consider that the current distribution of proportional growth in the named settlements of policy RA2 of the Core Strategy achieved its aims of rural sustainability? Please explain the reasons for your answer.

No, nobody really understands what proportional growth actually means and this needs to be addressed more rigidly. Also, it has become clear that sustainability means different things to different people and developers constantly try to exploit this. Sustainability must be better defined or divided into much clearer categories.

### Services and facilities

1. Have existing services been retained or new services and facilities provided through development in your parish? Please explain the reasons for your answer.

No to both. Developers seem to do their utmost to build, but are reticent to contribute to any improvement in services or facilities. Our Parish has so few facilities as it is and has lost its pub. We have no real community hub and no train or bus services. Schools, doctors, dentists etc are non-existent.

The only improvement has been broadband which until 2021 was woefully inadequate.

2. What would you consider to be the key services and facilities required to support proportional growth over the next twenty years? Please explain the reasons for your answer.

Better transport provision and safety improvements to encourage cycling and walking (nobody dares ride a bike along the A4103).

It needs to be made far easier to instal vehicle charging points (supply issues).

No facilities exist to encourage more children to live in the community and with a lack of employment opportunities, most people commute for all their needs.

Other services needed more broadly will be mains water (almost non-existent in Monkhide) and mains sewage. Heating is predominantly by oil and this will need to change.

### Future settlement hierarchy

1. Are there any constraints to new development in your parish which would affect future growth? Please explain the reasons for your answer.

Yes. Apart from the A4103, roads are twisty, single track and, in the case of Monkhide, dead end so any additional traffic flow will become a major issue. The lack of mains water and sewage treatment facilities will continue to be a barrier.

Without better local infrastructure, services and facilities, the parish will find it difficult to attract residents other than those who simply use it as a base where they sleep and do little else.

2. Would you consider your area to be a sustainable community for proportionate growth? Please explain the reasons for your answer.

No. Apart from fibre broadband and a petrol station, the parish has little to offer excepting its rural nature and views such that it cannot really be described as a sustainable community. It will need significant infrastructure investment for this to change.

This issue is compounded by the fact that Yarkhill comprises three distinct areas (Newtown, Monkhide and Yarkhill) which are unlinked and it is notable that it is identified as such in the Core Strategy. There is no one single village community which is likely to remain a barrier to future growth and the creation of a community that is truly sustainable.

### **Neighbourhood Planning Team**

From:	yarpolegroup <yarpolegroup@gmail.com></yarpolegroup@gmail.com>
Sent:	13 January 2022 11:36
To:	Neighbourhood Planning Team
Subject:	Re: Herefordshire Local Plan update – pre-consultation engagement
Categories:	Blue Category

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#### Dear Neighbourhood Planning Team

Thank you for consulting Yarpole Group Parish Council on the Herefordshire Local Plan update pre-consultation survey.

Whilst the Parish Council does not have responses to the specific questions included in the survey, it is keen to have the following taken into consideration.

Yarpole Group Parish Council wishes to highlight

- The ambition and vision of the Neighbourhood Development Plan (NDP)
- The significance of the NDP to the area
- The high importance of appropriate regard being paid to the NDP
- The value of developing Yarpole as a sustainable village
- The importance of supporting/enabling downsizing and family dwellings thereby promoting a sustainable community, as opposed to planning development encouraging only those in retirement.

Yours sincerely *Maggie* 

Mrs Maggie Brown Clerk Yarpole Group Parish Council yarpolegroup@gmail.com https://yarpolegroupparishcouncil.org.uk/

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