

Representation to Herefordshire Council on Regulation 18 Submission of Local Plan 2024

Policy No.	Summary
EE3	The Parish Council SUPPORT and applaud the emphasis on design in this policy.
AG1	The Parish Council OBJECT to the arbitrary allocation of sites, and HC are respectfully asked to produce evidence of the legal authority that empowers them to make such an allocation.
AG2	<u>IF</u> this policy allows settlements to identify their own sites for development and not be allocated by HC, it is SUPPORTED .
AG5	The Parish Council OBJECT to this Policy.
BC2	There is no doubt that affordable housing is required, the Parish Council SUPPORT this policy.
BC3	This is an opportunity to introduce innovative development forms and is SUPPORTED .
ROSS1 ROSS2	The Parish Council OBJECT to the inclusion of part of the parish in the plans for the major urban expansion of Ross on Wye while simultaneously being designated as a Rural Hub.
RURA1 RURA3	The Parish Council STRONGLY OBJECT to the designation of Weston under Penyard as a Rural Hub, and the consequent Strategic site allocation. See also general comments and observations on Page 14

Representation to Herefordshire Council on Regulation 18 Submission of Local Plan 2024

	Review of Strategic Policies
Policy EE3	Enhancing the quality of the built environment. [Edited]: To enhance the quality of the built environment development proposals will be required to: 1. Contribute towards the county's distinctiveness; 2. Create an informed sense of place; 3. Produce high-quality, through place-specific Design Codes and an overarching Herefordshire Design Code; 4. Where possible development proposals should be permeable and provide ease of access for all, connected footpaths and cycle routes; 5. Deliver safe communities,; 6. Require less energy through the orientation and siting of buildings; 7. Strive to be carbon neutral 8. Adhere to the guidance set out in Design Codes on a county and local level. Herefordshire Council will set a countywide Design Code to ensure developments are appropriate to their setting and context.
Comment	The Parish Council applaud the emphasis on design in this policy. The county has been plagued by developments that are without architectural merit and that produce developments that are dull, depressing, and uninspiring. The PC trust this policy is a move towards achieving better design standards. The Parish Council SUPPORT Policy EE3

Representation to Herefordshire Council on Regulation 18 Submission of Local Plan 2024

	Review of Strategic Policies
Policy AG1	Accommodating housing growth [Edited] A supply of deliverable and developable land will be identified to secure the delivery of a minimum of 16,100 new homes over the plan period 2021-2041 to meet the market and affordable housing need. The broad distribution of new dwellings in the county will be a minimum of: In rural areas, growth is to be focused on the most sustainable settlements identified based on their range of services, facilities, connectivity, infrastructure, employment provision and environmental constraints. Taking into account these environmental constraints, the majority of the development will be away from these locations. The most sustainable settlements in the rural areas will have rural strategic sites identified, and the remainder of development in the identified settlements will be identified through Neighbourhood Plans. Areas outside of defined settlements in the plan will be considered open countryside in planning policy terms. In these locations, residential development will be limited to specific exception criteria in Policy AG4 and AG5. Sites will be developed at densities that are appropriate to their locations, based on their surrounding environmental characteristics, and their access to sustainable transport, services, and facilities. The use of previously developed land in sustainable locations will be encouraged. See page 4 for comments

Representation to Herefordshire Council on Regulation 18 Submission of Local Plan 2024

	Review of Strategic Policies
Comment	HC are invited to consider and respond to three points: 1. The sentence highlighted in grey makes no sense in the context of the policy. HC to clarify please. 2. The paragraph highlighted in yellow states that HC will allocate strategic sites in those areas that qualify (WuP qualifies). This is a major departure from the principles of Localism. Hitherto, parish councils have been allocated housing supply targets, the identification of sites to meet these targets has been up to them and their NDP. HC have removed this decision from certain parishes (including WuP). The Parish Council STRONGLY OBJECT to the arbitrary allocation of sites. 3. HC are respectfully asked to produce evidence of the legal authority that empowers them to make such an allocation.

Representation to Herefordshire Council on Regulation 18 Submission of Local Plan 2024

	Review of Strategic Policies
Policy AG2	AG2: Strategic rural housing distribution <i>In Herefordshire's rural areas around 5,320 new dwellings will be provided over the 2021-2041 period to contribute to the county's rural housing needs. New housing development will be primarily focussed on 68 identified settlements across Herefordshire's rural areas.</i> <i>An indicative housing growth target for each identified settlement will be used as a basis for the production of Neighbourhood Development Plans within the county and will take into account existing site allocations and commitments.</i>
Comment	The highlighted paragraph seems to contradict policy AG1 by stating that indicative housing supply growth targets will be issued (in accordance with previous practice). It also states existing NDP allocations and commitments will be considered. <u>IF</u> this policy maintains the status quo of earlier policies and allows settlements to identify their own sites for development and not have sites allocated by HC, it is SUPPORTED.

Representation to Herefordshire Council on Regulation 18 Submission of Local Plan 2024

	Review of Strategic Policies
Policy AG3	<i>Rural housing growth in Rural Hubs and Service Settlements</i> <i>Proposals for new development should be located in accordance with the county's Rural Settlement Hierarchy. This will ensure that development reduces the need to travel and promotes sustainability of community services and facilities. Development on the use of previously developed land will be encouraged.</i> <i>Neighbourhood Development Plans will allocate land for new housing or otherwise demonstrate delivery of the required housing growth. Indicative growth targets for each settlement within the hierarchy will be used to inform Neighbourhood Development Plans.</i> <i>If a Neighbourhood Development Plan is not in existence, housing proposals will be supported if:</i> <i>1. They are located within or adjacent to the built form of the settlement named in Table 4;</i> <i>2. The development proposal is proportionate to the growth strategy for the settlement outlined in Policies RURA1 and RURA3;</i> <i>3. Regard has been taken to the level of outstanding commitments within the settlement; and</i> <i>4. The development proposal has considered the cumulative impact arising from the development, especially on infrastructure provision.</i>
Comment	As with Policy AG2, the highlighted paragraph appears to contradict Policy AG1 in allowing NDP's to allocate land for development. The Parish Council OBJECT.

Representation to Herefordshire Council on Regulation 18 Submission of Local Plan 2024

	Review of Strategic Policies
Policy AG5	<i>Open countryside</i> <i>Those areas outside of a settlement boundary or the built form of a named settlement within the settlement hierarchy outlined in Policy AG3 will be classified as open countryside.</i> .
Comment	This means that any development outside of the Settlement Boundary defined in the NDP will be considered to be open countryside in planning policy terms. Residential development in these locations will be restricted to limited exceptions. This measure severely restricts the ability of hamlets within the parish to accommodate development. The corollary is that the entire burden of housing allocation must be accommodated with the settlement boundary. This is punitive both for main settlements and for hamlets in the parish with sites with potential one-off development opportunities. The Parish Council OBJECT to this Policy.

Representation to Herefordshire Council on Regulation 18 Submission of Local Plan 2024

	Review of Strategic Policies
Policy BC2	<i>Affordable housing - thresholds and targets</i> <i>All new open market housing proposals will be expected to contribute towards meeting affordable housing needs on:</i> <i>1. Sites of more than 5 dwelling in the Designated Rural Areas and Wye Valley and Malvern Hills National Landscapes;</i> <i>2. Sites of more than 10 dwellings or larger than 0.5 hectares outside the areas referred to in 1) above.</i> <i>The amount and mix of affordable housing including those on strategic housing sites will vary depending on evidence of housing need as identified through the latest housing market assessment.</i> <i>The following indicative targets have been established based on evidence of viability in the county's housing value zones:</i> <i>Value Zone 1 Hereford & Ledbury and Value Zone 3 Bromyard, Ross-on-Wye & rural – 35%</i> <i>All affordable housing will be required to be available in perpetuity,</i>
Comment	WuP is a 'Designated Rural Area' and, if rural designation is approved, development of more than 5 houses will have to make a provision of 35% affordable housing. There is no doubt that affordable housing is required and historically developers have found loopholes in the current policy to avoid their obligations in this regard. The Parish Council SUPPORT this policy.

Representation to Herefordshire Council on Regulation 18 Submission of Local Plan 2024

	Review of Strategic Policies
Policy BC3	<i>Diversity of housing delivery</i> <i>The council will encourage a greater variety of ways of delivering housing. This will be achieved through:</i> <i>1. On sites of 20 or more dwellings, a minimum of 5% of dwellings being made available as dedicated serviced plots for self or custom build housing to suit a variety of incomes and housing needs;</i> <i>2. Sites allocated for market and affordable self and custom build and community led housing in Neighbourhood Development Plans;</i> <i>3. Community led housing schemes being encouraged as standalone sites or as part of a larger housing scheme where proposals meet local housing needs; and</i> <i>4. Self and custom build, and community led housing schemes that meet the definition of affordable housing on rural exception sites in accordance with Policy AG4.</i>
Comment	This is an interesting departure and will allow Parish Council's and other groups to set aside plots for non-traditional forms of development. The Parish Council consider this is an opportunity to introduce innovative development forms to the housing supply chain and SUPPORT this policy.

Representation to Herefordshire Council on Regulation 18 Submission of Local Plan 2024

	Review of Place Shaping Policies
Policy ROSS1	<i>Strategic development for Ross on Wye (Edited)</i> <i>Ross on Wye will accommodate a minimum of 1,800 new homes during the plan period. Of these, 1,000 new homes will be provided in a strategic mixed-use site to the east of the town in accordance with policy ROSS2.</i>
Policy ROSS2	<i>Land to the east of Ross-on-Wye (Edited)</i> <i>Land to the east of Ross on Wye will deliver a master-planned, mixed-use sustainable urban extension, which will expected to deliver:</i> <i>1. A minimum of 1,000 new homes, at an average density of up to 35 dwellings per hectare</i> <i>2. A minimum of 33 hectares of employment land, which should be well located in respect of access to the strategic road network;</i> <i>3. New road infrastructure linking the Travellers' Rest roundabout to the north west of the town with the A40 to the west of Hildersley. An area of land along the whole length of the eastern boundary of the urban extension should be safeguarded for the new road.</i> <i>4. Sustainable urban Drainage Systems (SuDS), to reduce the risk of both surface-water and watercourse flooding.</i>
Comment	HC propose a major expansion to Ross to the east (towards WuP). The site is identified in Appendix I on page 15. In Appendix II on Page 16 we show a plan with the parish boundary superimposed on it. It can clearly be seen that a large part of the expansion site (approximately 46 Ha or one third of the total) is actually within the parish of Weston under Penyard! In addition, it is intended to build a new 1.3-mile Ross bypass, following the western boundary of the urban extension, linking The Travellers Rest roundabout (Ross spur) with the A40 just west of Weston Hall Farm. 0.9 miles of this road would be within WUP, or on our boundary. Continued on page 11

	Review of Place Shaping Policies
Comment (Cont'd)	In policy RURA 1 Weston under Penyard is designated a 'Rural' Hub. It is logically inconsistent for the parish to be designated as a site for urban development and simultaneously be classified as a 'Rural' Hub. The two designations are and must be mutually exclusive. The Parish Council STRONGLY OBJECT to the inclusion of part of the parish in the plans for the major urban expansion of Ross on Wye while simultaneously being designated as a Rural Hub. The parish is either one or the other, it cannot be both. The Parish Council suggest the parish be removed from the list of Rural Hubs and the consequent allocation a Strategic Site. The Parish Council further suggest they continue to be allowed to allocate their own development sites within a revised NDP, work on which is in progress.

Representation to Herefordshire Council on Regulation 18 Submission of Local Plan 2024

	Review of Place Shaping Policies
Policy RURA1	Housing growth within Rural Hubs [Edited] <i>Housing growth will be directed to Rural Hubs and Hubs with environmental constraints in accordance with capacity and existing commitments and site allocations.</i> <i>Rural Hubs and Hubs with environmental constraints will be required to deliver growth through strategic housing allocations and site allocations in Neighbourhood Development Plans.</i>
Policy RURA3	Strategic site allocations in the rural areas [Edited] 1. <i>In addition to the requirements of other Local Plan policies, the development of these (Strategic allocation) sites will be required to have regards to the policies of the relevant Neighbourhood Development Plan and demonstrate that the proposals reflect the special character and distinctiveness of the settlement in accordance with the area Design Code.</i> <i>The strategic rural sites will require financial contributions to education provision. The site at Weston under Penyard also requires land to be safeguarded for a one form entry primary school.</i> <i>The strategic rural housing site on the southern edge of Weston under Penyard will accommodate up to 50 dwellings on a 5.5-hectare site, with a density of 25-30 dwellings per hectare.</i> <i>The scheme will provide 35% affordable housing and accommodate 20% Biodiversity Net Gain (BNG).</i> See page 13 for Comments

	Review of Place Shaping Policies
Comment	HC contend that Rural Hubs will provide vital roles within the rural areas not only for the settlement itself but <u>its wider rural hinterland and surrounding smaller settlements</u>. The use of the term 'wider rural hinterland' is interesting as Weston under Penyard parish abuts Ross on Wye, a town designated for major expansion as discussed on pages 10 and 11 above. There is no 'rural hinterland' separating the parish from the town. Herefordshire Council must recognise that, by its own definition, Weston under Penyard cannot be designated a Rural Hub and should be removed from the list of settlements so designated. We also observe that the other Rural Hubs are geographically removed from the nearest large town. Weston under Penyard is not and should be disqualified from the designation as Rural Hub by reasons of proximity alone. The Parish Council OBJECT to the designation of Rural Hub, and the consequent allocations, on the grounds of proximity and that part of the parish is designated for urban expansion. We firmly believe the decision of site allocation should remain with the PC and be published in the NDP.

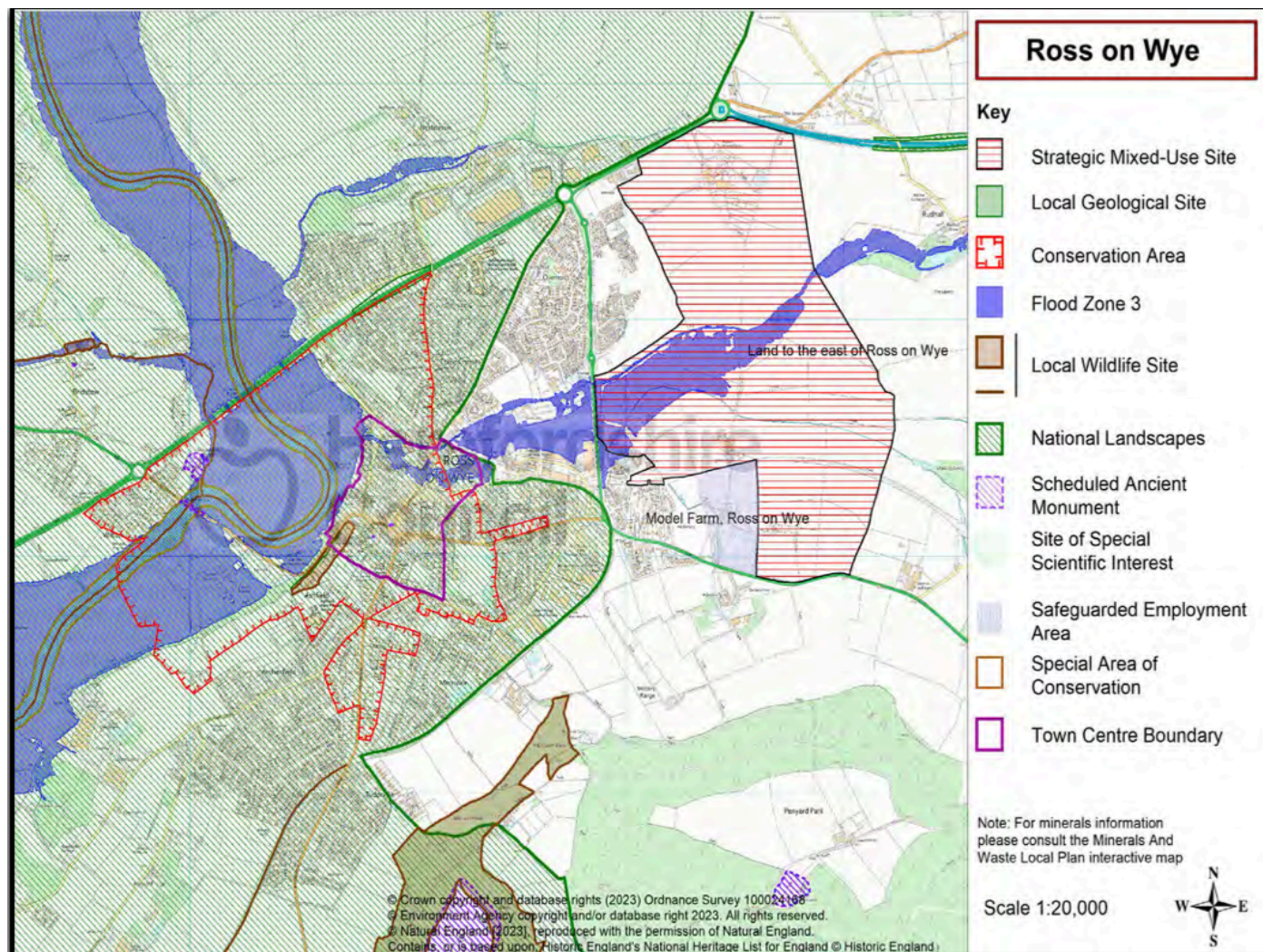
Weston under Penyard Parish Council
Representation to Herefordshire Council on Planning Applications

	GENERAL COMMENTS AND OBSERVATIONS
:	Some Policies are contradictory. The area designated for in ROSS 2 is within a flood zone as designated by the Environmental Agency. The strategic site for Weston under Penyard is within a flood zone as designated by the Environmental Agency. Herefordshire Council have issued a “Young Person’s Leaflet” in this Weston under Penyard is shown as having growth ‘up to 30’ houses. This does not agree with Policy RURA 3. Whilst recognising that the task of producing a Local Plan is a difficult one, the concept of Rural Hubs and Site allocation within them, has the appearance of a solution in search of a problem. It does not appear to give any discernible advantage over the previous system of allowing Local Parish Councils to make their own allocations in their own NDP’s. Weston under Penyard Parish Council strongly object to being included in the Local Plan as a Rural Hub and ask that the parish be removed from this category. The Parish is perfectly capable of allocating development sites of sufficient capacity to meet the reasonable demands of the Local Plan without having designated sites imposed on it.

Weston under Penyard Parish Council

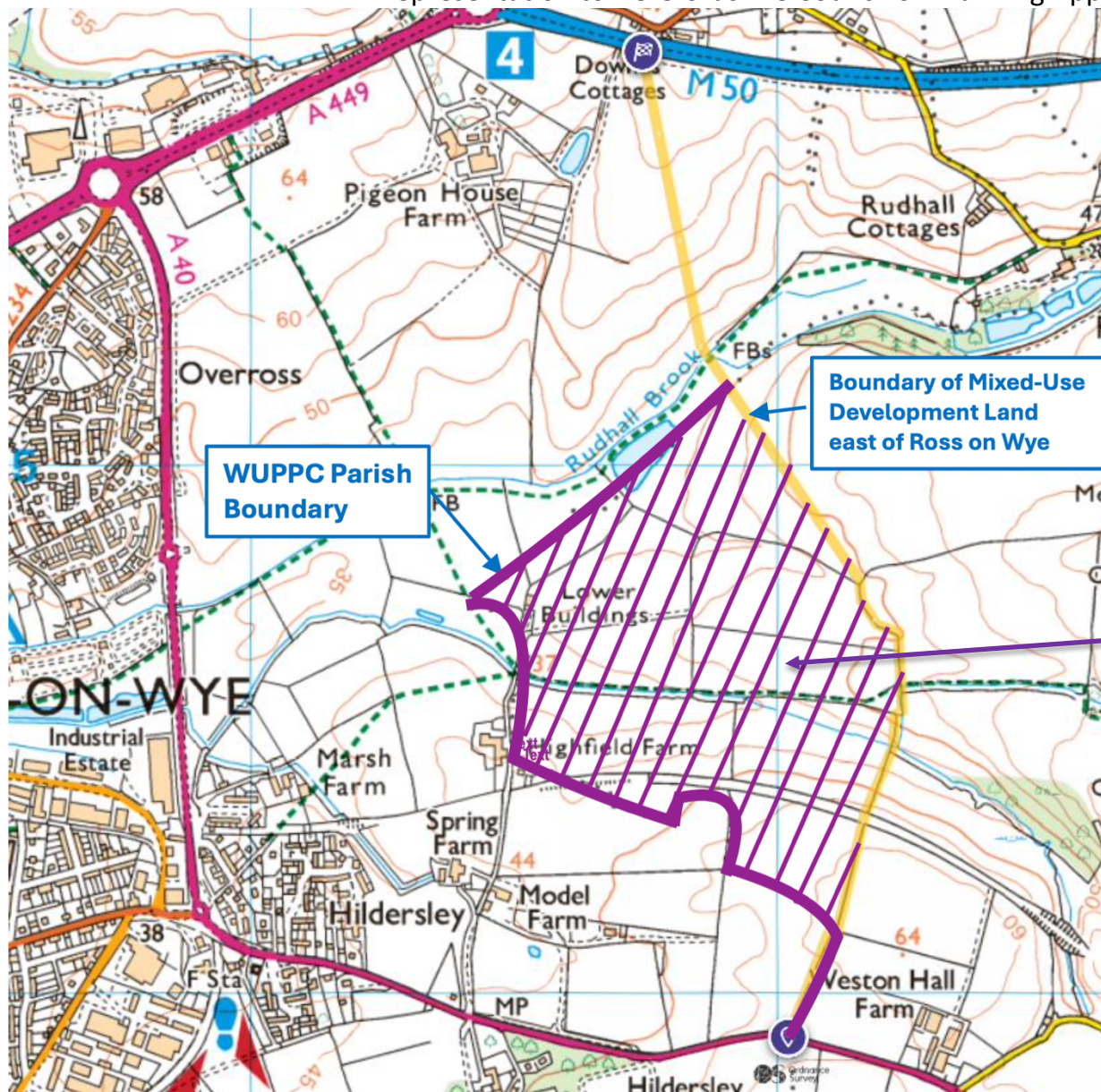
Representation to Herefordshire Council on Planning Applications

Appendix I



Weston under Penyard Parish Council
Representation to Herefordshire Council on Planning Applications

Appendix II



Area of Ross expansion
zone that lies within parish
of Weston under Penyard

Reproduced with thanks to John Smart