

Allensmore Neighbourhood Development Plan

Summary of comments received during submission consultation under Regulation 16 and Allensmore NDP Steering Group (on behalf on the Parish Council) responses:

From	Comment	Response
<p>Herefordshire Council Air, Land & Water Protection</p>	<p>Policy A3 – Proposed Site Allocations</p> <p style="text-align: center;">Site 4, Willoughby Cottage Garden, Winnal</p> <p>A review of Ordnance survey historical plans indicate the site has historically been used as an orchard. By way of general advice I would mention that orchards can be subject to agricultural spraying practices which may, in some circumstances, lead to a legacy of contamination and any development should consider this</p> <p style="text-align: center;">Site 6, Church Road, Allensmore</p> <p>A review of Ordnance survey historical plans indicate the site has historically been used as an orchard and the close proximity of the land to the adjacent farm indicates the land may have been used in other agricultural practices. By way of general advice I would mention that orchards can be subject to agricultural spraying practices which may, in some circumstances, lead to a legacy of contamination. Agricultural practices such as uncontrolled burial of wastes or excessive pesticide or herbicide application may be thought of as potentially contaminative. Any development should consider both the above former uses.</p> <p style="text-align: center;">Site 14, South of Winnal Farm, Winnal</p>	<p>Amendments were made following similar comments at Regulation 14 consultation to strengthen the policies:-</p> <p>Policy A4 (Criteria for Development in Settlement Boundaries) now includes the statement:</p> <p>9. Consideration should be given to the possibility of encountering contamination on sites as a result of former uses and specialist advice be sought should any be encountered.</p> <p>Policy A6 (Conversion of Former Agricultural Buildings) now includes the statement:</p> <p>Consideration should be given to the possibility of encountering contamination on sites as a result of former uses and specialist advice be sought should any be encountered.</p>

	<p>A review of Ordnance survey historical plans indicate an area of ground which has been classed as Unknown filled ground (pond, marsh, river stream dock) immediately adjacent the proposed site.</p> <p>Sites identified as unknown filled ground can be associated with contaminative fill material. In practice, many sites identified through the historical mapping process as unknown filled ground are instances where hollows have been made level with natural material, have remained as unfilled 'hollows' or have filled through natural processes. However, there are some instances where the nature of the fill is not inert and would require further investigation. Without any additional information it is not possible to comment further on this site. Any additional information you may be able to obtain will help in determining the exact nature of the site.</p> <p>The site's close proximity to the above mentioned historic potentially contaminative use, will require consideration prior to any development</p> <p>Site 16, Court Plocks -Barn Conversion</p> <p>Some farm buildings may be used for the storage of potentially contaminative substances (oils, herbicides, pesticides) or for the maintenance and repair of vehicles and machinery. As such it is possible that unforeseen contamination may be present on the site. Consideration should be given to the possibility of encountering contamination on the site as a result of its former uses and specialist advice be sought should any be encountered during the development.</p>	
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Highways England	Policy A4 Criteria 6 – Information should be supplied assessing the impact on the highways network.	<p>Ref Policy A4, criteria 6, if the examiner feels it necessary, the NDP Steering Group (on behalf of the Parish Council) would be happy to change</p> <p>Existing criteria: Sites have suitable and safe access. The impact of additional traffic from development proposals on existing rural roadworks should be carefully considered and suitable measures should be proposed to encourage appropriate traffic speeds</p> <p>Amendment to read: Sites have suitable and safe access. The impact of additional traffic from development proposals on existing rural roadworks should be carefully considered, an assessment provided, and suitable measures should be proposed to encourage appropriate traffic speeds</p>
	Policy A6 – Any development needs to assess the impact on the highways network.	This is covered by Policy A4, criteria for development in settlement areas – no change needed.
	Para 5.4.10 – Contact the West Mercia Safer Roads partnership for discussions on enforcement of the A465	Noted. As part of the non-planning issues in Appendix V of the Allensmore NDP, the Parish Council have authorised an “Allensmore Matters: Traffic & Road Safety Group” to work with relevant agencies on these issues. Various meetings have been held and initiatives are well underway.
	Para 5.4.14 – The X3 does extend beyond Abergavenny to Cardiff. It would be good to see the Parish actively promote the service which is commercially operated by Stagecoach. Should this service be withdrawn it is unlikely that any replacement could be provided on a subsidy basis.	We would have no objection to adding “and Cardiff” but only if no major implications of a change at this stage.

<p>Paul Smith Planning on behalf of Mrs Moore</p>	<p>Objection is raised to Draft Policy A4. Criterion 1 does not support new houses being erected “behind other houses.” This criterion is imprecise and seeks to dictate a pattern of settlement with no justification as to why non-compliant development would cause harm.</p> <p>Criterion 6 should be expanded to treat proposals that would entail environmental betterment as a significant material consideration in favour of proposed development.</p> <p>A further criterion to Draft Policy A4 should be added to permit limited residential development adjoining the settlement boundary to provide the NDP with limited flexibility to provide a different stream of potential proposals to contribute to proportional growth. Such a provision would better reflect Core Strategy Policy RA2 which supports new housing “in or adjacent” to Cobhall Common.</p>	<p>Ref comments by Paul Smith on behalf of Mrs Moore regarding the linear nature of development: the NDP Steering Group made extensive responses to these points, raised during the Regulation 14 Consultation – some of which are drawn on again in our response for the examiner to consider:</p> <p>Settlement boundaries Policy A1 sets out to protect and enhance the distinctive local landscape character. We accept that there are a handful of double depth houses in a small area of Cobhall Common where some properties have been erected along the road-side, usually, in front of older dwellings – the original houses being significantly set back down single, unadopted tracks. However, we believe that the basic characteristic of most of the built form in the NDP Designated Area, including Cobhall Common is linear (as set out in the ‘Portrait of Allensmore’ on pp12-13 of the Draft Plan). Most respondents (83%) in the Issues and Options consultation of January 2018 felt that the document provided a good summary of the local context compared with only 5% who did not [p9 First Draft Plan (Preferred Options) January 2019]. In consequence, during the ensuing NDP process, we aimed to conserve this settlement pattern which gives our parish its local distinctiveness, [also in line with Policy SS6 – Environmental Quality and Local Distinctiveness).</p> <p>In summary, we argue that the predominantly linear development of the parish is part of its basic character and distinctiveness. This has been recognised by independent agencies, for example, in the site assessment process by AECOM and also by the Planning Inspectorate in an appeal some years ago (Application No SH882172PO Appeal, Para 5). During the Preferred Options consultation, 93% (83 residents) agreed with this policy and 1 person disagreed. So we believe</p>
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		after further tightening the settlement boundary, enabling the requirements of the core strategy to be met, with <u>significant contingency</u> and whilst limiting development to <u>within</u> the settlement boundaries only. In fact, as of November 2019, the approvals of recent planning applications means that we have already exceeded the 2031 Core Strategy minimum target for new developments by 9. <u>Consequently, the NDP team feel it is not appropriate or necessary to extend the policy to areas outside but adjacent to settlement areas.</u>
	Draft Policy A6 as it relates solely to “former agricultural buildings”. Proposals for the conversion of all redundant or disused buildings should be considered favourably.	The policy is specifically about agricultural buildings, so we do not think any change should be made to policy A6. We touch on the matter in policy A4 in terms of preferring development on brownfield sites. If the examiner thinks it necessary, we would have no objection to adding a phrase to policy A4, criteria 1: after brownfield sites add “or reusing redundant buildings”.
Wye Planning on behalf of Mr M Jones	... It is requested that due consideration be given to amending the text of Policy A4, to that indicated below: <i>“Policy A4 – Criteria for Development in Settlement Boundaries in addition to the identified site allocations, proposals for new housing development within and <u>adjacent to</u> the identified Settlement Boundaries for Allensmore, Cobhall Common and Winnal (as shown on Maps 2, 3 and 4) will be supported where ...”</i>	Please see our response on settlement areas above (response to Paul Smith Planning on behalf of Mrs Moore). We would also note that we have already drawn settlement boundaries adjacent to the current built form where sites have been deemed to be suitable for development by both AECOM and the NDP Steering Group (and subsequently approved by Allensmore Parish Council).

Allensmore NDP Steering Group
December 2019