

Delivered by hand  
on 10/12/2021

Three Oaks,  
Axford Lane,  
Dinedor,  
Hereford HR2 6PB  
2021

Southern Area Planning Team  
Planning Services  
Herefordshire Council  
Plough Lane  
Hereford HR4 0LE



Dear Sirs

Re: PLANNING APPLICATION 213746/O

My brother [REDACTED] and I spent our childhood in the 70's and 80's growing up at Twyford Common. Our father John farmed at "Lyndhurst", Twyford Common for 60 years until his death.

I was concerned to read the submission of Callow and Haywood Parish Council regarding the above planning application following their meeting of 02/11/2021. The response errs in fact in the following respects:-

1. The Callow and Haywood NDP expresses a preference for new houses to be "adjacent or closely linked to existing built form". The area identified in the Core Strategy for development and accepted in the C & H NDP, albeit reluctantly, lies inside of the loop road around Twyford Common. The term "closely linked to" is not defined in the NDP. The Oxford English Dictionary defines adjacent as "lying near to – not necessarily touching". Close is defined as "having intervening space or spaces". The application site abuts the inside of the loop road at a point approximately half way between The Nest and Lyndhurst obliquely opposite to both and, at its closest point, some 33 metres from The Nest. In

terms of detached rural properties that must be considered as “adjacent or close to”. It should be pointed out that in order to meet the requirements of the Core Strategy any development would have to be inside of the designated area, not outside of the loop road as implied by the Callow and Haywood Parish Council. That PC objected to planning application 181347 on the grounds that the proposal lay **outside** of the Twyford Common area identified in the Core Strategy. In this case, planning application 213746/O, they object because it is **inside**. The Officer’s report on that application stated that although that site “does not fall within the description of land inside the unadopted road around the common it could be considered to be adjacent or closely linked to the existing built form ESPECIALLY GIVEN THE DISPERSED NATURE OF THE SETTLEMENT”. If that site was considered to be in accordance with Policy CH9, even though outside of the identified area, so must this site also be.

2. The availability of services in the Twyford area mirrors that for most of rural Herefordshire. Most villages do not have a pub or shop and very few have a doctors surgery. Many have no, or a very limited, bus service. If lack of these facilities had been a major determining factor most of rural Herefordshire would have been denied any new housing development and the County target for development would be very far from being met.
3. The PC expresses concern about sewage treatment and possible pollution of the Twyford Brook. The drainage report submitted by Wye Environmental Products & Services Ltd and included with the application following their site investigation, clearly addresses those concerns. The PC make no reference to this report. One has to conclude that they were unaware of it. The proposed drainage scheme is to be designed in accordance with the report’s findings. The application details also confirm that Twyford Brook lies more than 40 metres from the position of the proposed



system in accordance with the Planning Authority's relevant position statement.

4. The PC objection alleges that the only means of vehicular access to the site is via that section of the lane to the north restricted by the owner of land over which it passes. As previously stated the lane is a loop road thereby giving access onto the nearby highway at two points. This is recognised in para. 4.5.1 of the NDP.
5. The PC refer to this proposal as "building in open countryside". The area in question is identified in Policy RA2 of the Core Strategy for Housing Development. The PC response appears to be an attempt to re-write that policy and frustrate the Planning Authority objective for this area. Para. 4.5.3 of the NDP confirms that new development in the parish is to be limited to Twyford Common and Grafton, and therefore permitted. Core Strategy policy RA2 does not differentiate priority between the two. The proposal will conform to criteria 1, 3 and 4 of RA2. Criteria 2 does not apply as there is no brown field land available at Twyford Common.

At its 13<sup>th</sup> July 2021 meeting the Parish Council considered the local NDP housing position. At the outset of the NDP process it was made quite clear to PC's that the housing target set by Herefordshire Council was to be a minimum to be achieved by 2031 NOT a ceiling for housing development. This policy decision remains unaltered. Despite this, the PC has recorded in its minutes that there was no need for any additional housing in the parish as the minimum had been met. This indicates a presumption against any further applications referred to the PC, contrary to Herefordshire Council and Government Policy. Their negative response to the above application, which conforms to the requirements of the core strategy, points to a less than balanced approach.

Parish Councils have a responsibility to consider referred applications in an even-handed and factual way whilst having regard to the views of applicants, their supporters and any objectors together with relevant planning policies. The role of a PC is to recognise and discard misinformation and, as far as possible, provide accurate information to the Planning Authority. Failure to do so devalues the weight placed upon such submissions. It is therefore disappointing to see the tone and detail of the Callow and Haywood response in this instance.

[REDACTED]  
[REDACTED]  
[REDACTED] Many objectors appear to have not read the full application, its Planning, Design and Access Statement or the accompanying Drainage and Habitat Reports. Understandably they seem to also show lack of knowledge of the Core Strategy designation of Twyford Common or its inclusion in the NDP. I would urge local County Councillors and Planning Officers to accord little weight to representations not based on adopted planning policies. This application which is in full compliance with these policies should therefore be approved, if not, the Core Strategy adopted policy for housing development in Twyford must be deemed to have been abandoned.

Yours faithfully

[REDACTED]

Sharon Wood