

**From:** Reed, Emily <Emily.Reed@herefordshire.gov.uk>  
**Sent:** 19 June 2019 17:47  
**To:** DMScanning <DMScanning@herefordshire.gov.uk>  
**Subject:** 190650 - reps - PC obj

In regard to planning consultation:

**APPLICATION NO & SITE ADDRESS:** Planning further consultation - 190650 - Site adj. Church Lane, Allensmore, Herefordshire, **DESCRIPTION:** Site for erection of 6 dwellings, garaging and new vehicular accesses.

**GRID REF:** OS 346468, 236004

**APPLICATION TYPE:** Outline

The Allensmore Parish Council has considered the amended proposals and wish to make the following representation:

Allensmore Parish Council reiterates its objection to the application for 6 new dwellings off Church Road, Allensmore.

Except for the fact that more detail has been provided for the drainage arrangements, the reasons for objection as described in the previous submission (included below) still stand.

Furthermore the Parish Council wishes to add / re-iterate the following:

We believe this proposal is not consistent with the Herefordshire Core Strategy. Policy RA2 of the Core Strategy requires that for developments in settlements listed in Fig 4.15 (which includes Allensmore) *“particular attention will be given to ensure that housing developments should respect the scale, form, layout, character and setting of the settlement concerned. By virtue of their size and character many of these settlements do not have a traditional village or nuclear centre and in many cases have a dispersed settlement pattern which would need to be respected in the design of new housing proposals”*. The PC is firmly of the view that the density, the regimented nature of the layout and aspects such as a double length garage side on along the boundary standing higher than the road are not respecting the scale, form, layout, character and setting of Allensmore.

The Allensmore NDP is now well into the Regulation 14 consultation stage. As part of the NDP, the site was independently assessed and not recommended for development. Furthermore, with recent developments and planning approvals Allensmore has already exceeded the minimum target for development by 2031 as set out in the core strategy and still has further recommended sites identified in the NDP to provide further contingency. This site, not recommended by the independent assessment, is not required to meet our development targets.

We note that the agent has acknowledged in an email, the inadvertent misrepresentation of facts in the Planning, Design and Access statement (Para 7.2) where it is stated that at 6.6 (figure incorrect) dwellings per acre, the development comfortably reflects the desire for a low density of 8.8 dwellings per acre (figure incorrect) as exists in the settlement of Allensmore. As is now accepted by the agent the correct density of the proposal is 7.5 dwellings per acre and that this is more than double the corrected figure of 3.6 dwellings per acre for the settlement.

The Parish Council is surprised and disappointed to note, that Herefordshire Council is knowingly allowing this misrepresentation of facts to continue without correction for this further consultation. Consequently, participants in the public consultation by Herefordshire Council who read the statement referenced above are likely to be misled into believing the proposal is of similar density to the existing settlement when in fact it is more than double. This is a matter of significance and brings into question the efficacy of this consultation to enable the public to make an accurate assessment of the impact of the proposal on the parish. It would seem that correcting the misleading statements and republishing this document to enable an accurate consultation is long overdue.

### **Previous submission**

The Allensmore Parish Council has considered the proposals and wish to make the following representation.

Allensmore Parish Council objects to the proposal in outline planning application 190650 for 6 new dwellings along Church Road on the following grounds:

- The proposal is inappropriate for the area with the size, density and layout being totally out of character with and detrimental to the surrounding area. The claim in the proposal (Design and access statement para 7.2) that it comfortably reflects the Allensmore housing density is incorrect and misleading, in fact the proposal is more than double the density of the proposed settlement in Allensmore (see below).
- There are important matters such as drainage which are either not mentioned or inadequately mentioned in the proposals. The Parish Council considers that the application should be rejected whilst these are not properly addressed.

### **Inappropriate size, density and layout**

As the design and access statement reflects, (para 1.3 and others), the National Planning Framework requires development to significantly enhance its immediate setting, whilst being sensitive to the defining characteristics of the immediate area.

Allensmore is characterised by low density, linear developments of different designs, scale and materials with many green spaces and open views across fields to open countryside and distant hills. This proposal would fill one such greenspace by high density (relative to Allensmore), regimented building which would create an urbanised pocket within the rural surroundings and block views of open countryside from the public road.

Para 7.2 of the design and access statement mistakenly and misleadingly asserts that the proposal “comfortably reflects the desire for a lower density”. It reaches this conclusion by referencing the emerging Neighbourhood Development Plan and misquoting it as identifying Allensmore as having a density of 8.8 dwellings per acre. In fact the plan (see [Allensmore.org.uk](https://www.allensmore.org.uk)) identifies the density as 8.8 dwellings per *hectare*. This is equivalent to 3.6 dwellings per acre. The same paragraph then states the area of the proposed site is 0.9 acres. Based on the proposal’s stated area of 0.33 hectares (para 2.1) the correct figure is 0.8 acres. Even the straightforward density calculation based on 0.9 acres ( $= 6 / 0.9$ ) is incorrect, the correct figure is 6.7 not 6.6 as stated. Based on the proposal’s stated area of 0.33 hectares, the proposed density is 7.4 dwellings per acre compared with a correctly stated density of 3.6 dwellings per acre in the proposed settlement i.e. the proposal is more than double the density of the settlement area proposed.

After correcting for these errors, it is hard to argue that the proposal is being sensitive to the defining characteristics of the local area as is required by the National Planning Framework.

Policy RA2 of the Core Strategy describes the policy for housing in rural areas. Allensmore is not included in fig. 4.14 which identifies the settlements which are the main focus of proportionate development but in fig. 4.15 – other smaller settlements where development is appropriate. For these settlements the policy requires that *“particular attention will be given to ensure that housing developments should respect the scale, form, layout, character and setting of the settlement concerned. By virtue of their size and character many of these settlements do not have a traditional village or nuclear centre and in many cases have a dispersed settlement pattern which would need to be respected in the design of new housing proposals”*.

The site is significantly higher than the road particularly at the NE and SW ends. The houses proposed would stand high above the road and the large, double length garage stretching parallel to the road just inside the hedgerow would all contribute to creating an urban and enclosed feel to the area.

The site was not recommended for development by independent assessors, Aecom, when it was assessed as a potential site during the development of the NDP. The assessment stated *“... it is constrained by landscape considerations as its openness enables views out over the countryside. The site is considered to make an important contribution to the rural character and setting of Allensmore”*.

The site will have a detrimental impact on the footpath (AN5), changing this section of it from having open views to becoming a claustrophobic alleyway.

### **New dwellings**

Paragraph 3.11 of the design and access statement correctly identifies that as part of the adopted Core Strategy, the parish of Allensmore is expected to accommodate a minimum of 14% growth in housing numbers up to the year 2031. This equates to 32 dwellings. To date, a net 29 have been completed or approved, leaving three further dwellings needed to meet this minimum target. The current draft of the NDP identifies potential capacity for some 15 - 20 such dwellings, comfortably exceeding the housing growth target and in a way which is considered much less detrimental to the character of the area valued by residents.

### **Housing mix**

In paragraph 7.1 of the design and access statement, the proposal acknowledges the need for three bedroomed dwellings as identified in the Local Housing Assessment and reflected in the emerging NDP. Further, the need for study space to facilitate home working is also recognised. The proposal states that just two of the dwellings have four bedrooms while the rest have three. (Recently amended to include two with two bedrooms). The Parish Council questions if two of the “three bedroomed” houses (Type B and B1) are really three bedrooms, or has this been achieved merely by labelling the fourth room upstairs as a “Study”. It would appear that it could equally well be considered a fourth bedroom.

### **Matters not adequately covered in the proposal**

#### **Foul drainage**

Allensmore is well known for its challenging drainage conditions due to a high water table and heavy, poorly draining soil. The application makes little mention of how foul drainage would be achieved other than a brief mention (para 8.1) of a package treatment plant within the development and a

contradictory drawing (site layout plan) showing it outside the site. Given the experience of local people and the difficulties in designing an acceptable solution with other developments in the parish, the Parish Council believes that the application should be rejected until it demonstrates that a sustainable solution can be developed and would be implemented. The proposal should also address the ongoing maintenance arrangements for what appears to be a shared solution. This design would require the necessary tests to be conducted and the proposal to be approved by Herefordshire Council's drainage team.

#### **Drainage – surface water**

As above, given the low porosity, high water table and limited space, the proposal should describe a sustainable surface water drainage solution to meet the needs of the proposed dwellings and without increasing the risk of local flooding of nearby houses or Church Road (the latter is identified on the government's flood risk maps as at medium risk of flooding). To design an appropriate solution would require appropriate measurements on the site and the proposed solution would need to satisfy Herefordshire council drainage experts.

There is an open ditch (not shown on the proposal) which runs between the Church Road and the hedge from the existing site access towards the Church. This has an important role to collect and channel water which runs off the proposed site and also from the road.

The new access will cut across this. The proposal should make clear what measures would be taken to ensure this ditch can continue to serve its purpose.

#### **Footpath AN5**

The gate for the footpath in the north-eastern corner of the site, is not correctly marked on the site layout plan. Rather than adjacent to the north western boundary as shown, it is approximately 2.5 meters from the boundary to the nearest point of the gate. It is not clear what steps the proposed development would take to allow for this, but this should be addressed in the proposal and the footpath officer given a further opportunity to comment following the correction of the site layout plan.

The Parish Council feels that the proposal is inappropriate for the character of the area and for this reason together with the errors and omissions described above should be rejected.