Local Plan – Core Strategy
Proposed Main Modifications
Representation Form
March 2015

The publication period:
The publication will run from 20 March 2015 to 1 May 2015.

Submitting your comments:
Comments may be submitted in the following ways:

- Online at: www.herefordshire.gov.uk/posthearing

- By emailing this form to: programme.officer@herefordshire.gov.uk

- By posting this form to:
  Programme Officer,
  c/o Herefordshire Council,
  Plough Lane, Hereford, HR1 0LE

This form can be downloaded from the above website or you can request a form by telephoning 01432 38 3357.
Alternatively, copies are available at all Customer Service Centres in the county.

Please note that comments must be submitted in writing. Telephone or social media comments cannot be accepted.

Filling in the form:
This form has two parts:

- You must complete one copy of Part A, which asks for your personal details.

- You should complete a separate copy of Part B for each section of the Plan that you wish to comment on – you can complete as many Part B forms as you like. Please ensure that Part A and B forms are joined together.
Your comments:

- No comments will be accepted after 1 May 2015.

- All comments will be considered by the Planning Inspector as part of the examination of the Plan. The Inspector may wish to contact you to discuss your comments and concerns, prior to concluding the formal examination into the Plan.

- Please do not repeat your previous comments as these have already been considered by the Planning Inspector. Comments will only be accepted that refer to a change as shown in the schedule of main modifications.

- The personal information in Part A will only be used for purposes related to the consultation and the Herefordshire Local Plan examination. Only your name and/or organisation will be published. However other information will be shared with the Planning Inspector. The information on Part B will be published on the Council’s website.

Purpose of the publication:

The purpose of the Local Plan examination is to enable the Inspector to decide whether the Plan is ‘sound’, legally compliant and has been produced in accordance with national planning policy and the relevant legislation. A more detailed explanation of the examination process is set out on Part B of the form. It will assist the Inspector if you are able to bear in mind the purpose of the examination when you are completing the form, and relate your representation to these points whenever possible.

Comments must be submitted by no later than 1 May 2015.

If you need help to understand this document, or would like it in another format or language, please contact the Planning Policy Team on 01432 383357.
Herefordshire Local Plan – Core Strategy
Proposed Main Modifications

Part A

Personal details

Title: ..... Miss ............ Initials: ..... D .......Surname: ... Collier ........................................

Job title (where relevant): ....... Assistant Planner .................................................................

Company/Organisation (where relevant): .......Smiths Gore ...................................................

LDF number: ........Have commented before (reference unknown) ................................................
(If you have made a comment on a previous LDF consultation then please enter your reference here)

Address 1:.... C/O Smiths Gore
York House
Blackbrook Business Park
Taunton

Postcode:............TA1 2PX........................................

Telephone number:......... 01823 445030........................................................................

Email address:.......... donna.collier@smithsgore.co.uk .........................................................

Preferred contact method: ..... e-mail ..............................................................

If you are an agent,
Please indicate the name of the client that you represent:......Hereford Diocesan Board of Finance......

If you do not wish to receive further information about the Core Strategy Examination, please tick: ☐
Herefordshire Local Plan – Core Strategy
Proposed Main Modifications

Part B

Comments on soundness

Please use a separate sheet for each proposed modification you wish to comment on.

All representations will be considered by the Planning Inspector as part of the examination of the Plan. The purpose of the examination is to enable the inspector to decide whether the Plan is ‘sound’. For a Plan to be sound, it must be:

- **Legally compliant.** This means that the Plan meets the legal requirements under Section 20(5) (a) of the 2004 Act (as amended by the Localism Act 2011) and the Town and Country Planning (Local Planning) (England) Regulations 2012.
- **Positively prepared.** This means that the Plan should seek to meet objectively assessed needs and infrastructure requirements where it is reasonable to do so and where this is consistent with achieving sustainable development.
- **Justified.** This means that the Plan should be the most appropriate strategy, considered against reasonable alternatives.
- **Effective.** This means that the Plan should be deliverable and based on effective joint working on cross-boundary priorities.
- **Consistent with national policy.** This means that the Plan should enable the delivery of sustainable development in accordance with the National Planning Policy Framework 2012.

You should bear these considerations in mind when making your comments.

B1. Which part of the proposed main modifications does this comment relate to?

Modification : Various - (Inc. MM05, MM036, MM037, MM038, MM040, MM041, MM042, MM043, MM052, MM057)

B2. Do you consider the proposed main modifications address the following issues in relation to the policies concerned?

<table>
<thead>
<tr>
<th>Issue</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Legally compliant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Positively prepared</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Justified</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Effective</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Consistent with national policy</td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>
B3. If you have ticked no to any of the above, please give your reasons below with regards to the Tests of Soundness?

See Attached Report.
B4. Please set out what change(s) you consider necessary to make the Local Plan – Core Strategy Proposed Main Modifications legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See Attached Report.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify the representation and the suggested change. There will not normally be an opportunity to make further representations. After this stage, further submissions will only be at the request of the independent Inspector based on the matters and issues identified for examination.

Name: ........ Donna Collier ......................................................................................................................

Signature: ................................................................................................................. Date: .... 23rd April 2015 .......................
Response on behalf of Hereford Diocesan Board of Finance

April 2015
## Contents

**1.0 Introduction** ................................................................. 1  
1.1 Scope of Response ............................................................. 1  

**2.0 Tests of Soundness** .......................................................... 1  
2.1 Basis for Response .............................................................. 1  

**3.0 Visions, Objectives & Spatial Strategy** ................................ 2  
3.1 Policy SS2 (Releasing land for residential development) ............. 2  

**4.0 Place Shaping** .................................................................. 3  
4.1 Policy RA1 (Rural housing distribution) ................................. 3  
4.2 Policy RA2 (Housing in settlements outside Hereford and the market towns) ...... 4  
4.3 Policy RA3 (Herefordshire’s countryside) .................................. 9  
4.4 Policy RA5 (Re-use of rural buildings) ...................................... 10  
4.5 Policy RA6 (Rural economy) .................................................. 11  

**5.0 General Policies** ................................................................. 12  
5.1 Policy H1 (Affordable housing – thresholds and targets) .............. 12  
5.2 Policy H2 (Rural exception sites) .............................................. 12  
5.3 Policy E4 (Tourism) ............................................................... 13  

**6.0 Environmental Quality** ....................................................... 13  
6.1 Policy LD4 (Historic environment and heritage assets) ............... 13  

**7.0 Conclusion** ...................................................................... 14  
7.1 Omissions ............................................................................. 14  
7.2 Summary ............................................................................... 14
1.0 Introduction

1.1 Scope of Response

1.1.1 This consultation response has been prepared by Smiths Gore on behalf of The Hereford Diocesan Board of Finance (HDBoF). The submission has been prepared following an invitation from Herefordshire Council to comment on its proposed Core Strategy Main Modifications. The consultation will run between 20\textsuperscript{th} March - 1\textsuperscript{st} May 2015.

1.1.2 HDBoF is a significant land and property owner in Herefordshire and is keen to ensure that the emerging Core Strategy is responsive to local circumstances and supports rather than constrains development in the county to meet the social, economic and environmental needs of Herefordshire’s communities.

1.1.3 Smiths Gore also submitted responses to consultations regarding the Core Strategy in 2011 to the Revised Preferred Options and again in 2013 to the Draft Core Strategy. This submission draws on these earlier responses.

1.1.4 This response makes detailed comments on the soundness of the proposed main modifications, for which comments are limited to. This assessment is carried out using the four tests of soundness, as set out in Section 2.0.

2.0 Tests of Soundness

2.1 Basis for Response

2.1.1 In accordance with paragraph 182 of the National Planning Policy Framework (the Framework) which relates to Plan Making and specifically ‘Examining Local Plans’ a local planning authority should submit a plan for examination which it considers to be "sound". The paragraph states that this means it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable
development;

- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

2.1.2 This response therefore examines the proposed changes to the Core Strategy against the above tests of soundness.

### 3.0 Visions, Objectives & Spatial Strategy

3.1 Policy SS2 (Releasing land for residential development) – Modification MM05 - is considered **UNSOUND** as it is not compliant with national policy which gives equal weight to social, economic and environmental factors.

3.1.1 The removal of the word ‘local’ is supported as it acknowledges housing need for the whole of the authority area and also allows compliance with paragraph 54 of the Framework on rural housing, which highlights the duty to cooperate with neighbouring authorities on housing delivery, as a key strategic issue and therefore, the policy is positively prepared.

3.1.2 The change of terminology from ‘Rural Villages’ to ‘Rural Settlements’ is also supported as it recognises that smaller rural locations play a role in contributing to housing need and that they are not necessarily isolated, having shared functional relationships. This is compliant with paragraph 55 of the Framework which states that “where there are groups of smaller settlements, development in one village may support services in a village nearby” and makes the housing targets more deliverable.

3.1.3 However, the rewording of the final sentence of the second paragraph, which now
reads “In the wider rural areas new housing will be carefully controlled reflecting the need to recognise the intrinsic character and beauty of the countryside”, could lead to refusals for any residential development in rural areas by giving too much weight to environmental issues. Although one of the core planning principles does state “recognising the intrinsic character and beauty of the countryside”, the same principle also goes on to say “and supporting thriving rural communities within it”. Furthermore, paragraph 14 of the Framework also emphasises the ‘presumption in favour of sustainable development’ which should be seen as a golden thread running through both plan-making and decision-taking. This means that sites should be considered on their social, economic and environmental merits – which are mutually dependant and therefore given equal weight.

3.1.4 Additionally, it should be noted that the reference to the list of villages within the table is not clear. It is assumed that this refers to table 4.20 and 4.21 which appears later within the Plan?

4.0 Place Shaping

4.1 Policy RA1 (Rural housing distribution) – Modification MM036 - is considered to be SOUND as it provides greater flexibility to deal with changing circumstances over the life-time of the plan and provides opportunity across the whole of the authority area.

4.1.1 The use of the word ‘minimum’ is compliant with paragraph 50 of the Framework, which states “policies should be sufficiently flexible to take account of changing market conditions over time”.

4.1.2 The removal of “with the development of affordable housing being a priority” is not problematic as the issue is adequately covered elsewhere in the Plan, namely Policy H1 (see below).

4.1.3 The removal of a growth percentage target is welcomed as it could act as a barrier to growth and should not be the sole reason for restricting development on an otherwise suitable site.

4.1.4 The table given in this policy is not considered to unduly restrict rural housing development in some areas and not others, although, the word ‘approximate’ in the
table headings should be changed to ‘minimum’ to be consistent with the wording changes found at the first paragraph of the policy.

4.2 Policy RA2 (Housing in settlements outside Hereford and the market towns) – Modification MM037 - is considered UNSOUND. Whilst the HDBoF support the simplification of the policy, bullet point (1) should be reworded as it is not compliant with national policy and other policies within the Plan.

4.2.1 The HDBoF welcome the changes to this policy which equate to a simplification, reducing the criteria to five points which apply to both tables 4.20 and 4.21.

4.2.2 However, it is recommended that, regarding bullet point (1), the requirement for sites to be “located within or adjacent to the main built up area” be altered to read ‘well related to existing development’. This will support policies found elsewhere in the Plan (in particular policy RA3 and paragraph 4.8.28) that recognise the full spectrum of settlement scales and allows a case-by-case appraisal of a site’s relationship with a settlement. Furthermore, paragraph 55 of the Framework states that to promote sustainable development in rural areas it should be recognised that “where there are groups of smaller settlements, development in one village may support services in a village nearby”, this rural inter-relationship of settlements means that even smaller clusters should not be excluded from reasonable growth.

4.2.3 The interim measures mentioned in paragraph 4.8.28 which states that the “Council will assess any applications for residential developments in Figure 4.20 and 4.21 against their relationship to the main built up form of the settlement”, should be applied in policy RA3 but also here in policy RA2.

4.2.4 Additionally, the HDBoF are pleased to see that the following villages are included in Figure 4.20:

- Bishop’s Frome
- Bodenham
- Colwall
- Cradley
- Dilwyn
- Eardisland
- Eardisley
- Ewyas Harold
- Kingsland
- Lyonshall
- Madley
- Much Dewchurch
- Pembridge
- Weobley
- Whitbourne
- Withington
4.2.5 Furthermore, the HDBoF owns land in and around a number of settlements which are well located to provide modest village housing allocations and are currently available for development. Those various sites and their development potential are detailed below.

Eardisland

![Figure 1: Map showing land at Eardisland.](image)

4.2.6 The HDBoF’s land at Eardisland is located just to the South of the centre of the village and is bound on three sides by existing residential development. The site can be accessed to the South from an existing road and is level with no specific physical constraints. The site can be brought forward early in the plan period and could accommodate a sensitively designed and locally distinctive village housing scheme.
4.2.7 The HDBoF owns two portions of land at Eardisley both of which are considered to have development potential and could be allocated in order to accommodate modest village scale developments to support local services and meet local housing needs.

4.2.8 The site to the North could be accessed via Mill Stream Gardens and is bound on two sides by existing development. The site is level and there are no specific physical constraints which would inhibit its development. The site could be brought forward early in the plan period and could accommodate a sensitively designed and locally distinctive housing scheme.

4.2.9 The site to the south is located on the main road through the village and is bound on two sides by existing residential development. Being located on the main road through the village it can easily be accessed and is level with no physical constraints to development. This site could also be brought forward early in the plan period and could accommodate a sensitively designed and locally distinctive housing scheme.
Madley

4.2.10 The HDBoF’s land in Madley, lies to the East of the village and to the rear of the parish church. The site lies to the South of the main road through the village, the B4352, and could easily be accessed off this road. The site is not designated by any protective policy and is not the subject of any other physical constraints. It is also level and can easily be delivered early in the plan period. Therefore, this site can accommodate a sensitively designed and locally distinctive housing scheme to meet local housing need.

Much Dewchurch

Figure 3: Map showing land at Madley.

Figure 4: Map showing land at Much Dewchurch.
4.2.11 The HDBoF’s land in Much Dewchurch is located to the East of the village and sits on the northern side of the main road through the village, the B4348. The South-west corner of the site has already been developed with three sets of semi-detached properties. There is further residential development to the west and a larger residential housing development a field away to the southeast known as Church View. A small drain appears to run through the northern section of the site, though the site can easily be developed to the south of this without issue. Therefore, this site can accommodate a sensitively designed and locally distinctive housing scheme to meet local housing need.

Weobley

![Figure 5: Map showing land at Weobley.](image)

4.2.12 The HDBoF’s land at Weobley is located to the North of the village and is bound by residential development to the East and South with additional development on the other side of Meadow Street to the west, with Dairy Farm located to the North. The site is accessible from both Meadow Street and Church Road and is also level with no other physical constraints. The site is near to the Church, which lies to the East, but it is well screened by an existing large and mature row of trees. Therefore, this site can accommodate a sensitively designed and locally distinctive housing scheme to meet local housing need.
Withington

Figure 6: Map showing land at Withington.

4.2.13 The HDBoF’s land at Withington is located to the north of the village adjacent to the primary school. The site bounds and has an existing access onto Duke Street. The site does lie within the Conservation Area but is not the subject of any other designation or any other physical constraints. As such the site could easily be delivered early in the plan period. Therefore, this site can accommodate a sensitively designed and locally distinctive housing scheme to meet local housing need.

4.3 Policy RA3 (Herefordshire’s countryside) and Paragraph 4.8.28 – Modification MM038 – is considered UNSOUND by means of its inability to define the locations where the policy might apply and is therefore not effective.

4.3.1 The policy resembles the exception criteria for residential development in isolated rural areas found in paragraph 55 of the Framework. The addition to bullet point (4) has been added in order to more closely relate to the wording given in that paragraph.

4.3.2 However, the attempt to define what constitutes rural locations is dependent on additional documentation (such as neighbourhood development plans or the rural areas site allocations DPD) which have not yet been prepared. The interim measures mentioned in paragraph 4.8.28 which states that the “Council will assess any applications for residential developments in Figure 4.20 and 4.21 against their relationship to the main built up form of the settlement”, if suitable for an
undisclosed amount of time, should serve as adequate for policy RA3 and renders the reliance on secondary documentation unnecessary.

4.3.3 It is not clear but the policy also suggests that there will be an emphasis on the use of settlement boundaries, which is not supported (see section 4.4 below). The HDBoF would like to encourage the Local Planning Authority to avoid relying on the concept of ‘settlement boundaries’ to determine whether or not a development is considered to be sustainable. Elsewhere in the Plan, such as the change from 'Rural Villages’ to ‘Rural Settlements’, there is acknowledgement that rural settlements can have a shared functionality. The relationship that exists between smaller rural communities are highlighted in paragraph 55 of the Framework.

4.3.4 Furthermore, there is no reason why a sensitively designed development proposal located outside of a town or village, which is well related to a cluster of existing buildings and positioned along a public transport corridor, should be considered unsustainable. Such a scheme may be far less visually intrusive than a development which is simply tacked on to the edge of a settlement.

4.3.5 Additionally, as per our previous submission regarding the Core Strategy, the policy fails to make adequate support for live-work units. This is not consistent with policy SS5 (Employment provision) and RA5 (Re-use of rural buildings) of the Plan and not in accordance with paragraph 21 of the Framework which encourages the facilitation of “flexible working practices such as the integration of residential and commercial uses within the same unit”.

4.4 Policy RA5 (Re-use of rural buildings) – Modification MM040 – is considered UNSOUND, due to the removal of residential uses and an ambiguous addition which could be interpreted to exclude certain types of residential development, which is not compliant with other policies of the Plan or paragraph 55 of the Framework.

4.4.1 The changes proposed in this policy primarily seek to remove the scope for residential conversion or re-use of rural buildings. The exclusion of residential conversions is not compliant with paragraph 55 of the Framework, which demonstrates the acceptability of residential conversion schemes.
4.4.2 The expansion of permitted development rights through the GPDO to convert agricultural buildings to other uses in 2013 (a variety of uses) and then in 2014 (to residential use) demonstrates the national support for residential conversions. The exclusion of residential conversions being demonstrated by the proposed changes to policy is not in line with this ethos.

4.4.3 The policy is contrary to bullet point (4) of policy RA3 of the plan which states that “residential development will be permitted where... [it] would result in the sustainable re-use of a redundant building or disused building(s) where it complies with policy RA5 and leads to an enhancement of its immediate setting”. The reference to policy RA5, can no longer apply as the residential element of the policy has been removed.

4.4.4 Additionally, supporting paragraph 4.8.44 states that “Where a redundant building in open countryside is a heritage asset and is proposed for residential use, applicants must demonstrate that other non-residential uses are not viable through a market tested report to be submitted with any application”. Given the context of paragraph 55, which relates to residential development in rural areas, residential use is an acceptable use for a conversion. No sequential requirements should be necessary, regardless of the age or significance of the building.

4.5 Policy RA6 (Rural economy) – Modification MM041 – is considered SOUND. The removal of overly restrictive requirements that prevents growth of the rural economy and is otherwise safeguarded through Policy SS1 of the Plan and the presumption in favour of sustainable development of the Framework, is supported.

4.5.1 The removal of overly restrictive requirements in the opening paragraph of the policy is supported. These aspects will be adequately covered by policy SS1 (Presumption in favour of sustainable development) and through the presumption in favour of sustainable development of the Framework.

4.5.2 Strong rural economies offer those living in rural areas better opportunities to work in their local community. This helps reduce the level of out-migration of young people and has sustainability advantages by reducing the need to travel long distances to places of work.
4.5.3 The policy provides detail regarding the types of economic development that will be supported in rural areas. This assists both applicants and decision makers in having certainty over what is acceptable, this in turn helps the economy and ensures a smooth and consistent planning process is in place. The policy is therefore fully supported.

5.0 General Policies

5.1 Policy H1 (Affordable housing – thresholds and targets) – Modification MM042 – is considered **SOUND** as it is compliant with recent changes in planning guidance on affordable housing provision for small sites.

5.1.1 Policy H1 takes into account recent changes to affordable housing requirements for small sites, implemented through the National Planning Practice Guidance (NPPG), and duly amends the thresholds from which the requirements will apply.

5.1.2 However, the policy does acknowledge the issues surrounding viability, which is compliant with paragraph 173 of the Framework and states that “To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable”. The wording suggests that negotiation will be possible, provided that evidence is supplied.

5.1.3 Where the requirement for affordable housing applies, percentages of provision are given for different areas which reflect the level of need. However, the Council should consider by what means these levels will be reassessed and applied should the requirements change over the life of the plan.

5.2 Policy H2 (Rural exception sites) – Modification MM043 – is considered **SOUND** as it seeks consistency with other proposed changes which are not otherwise contentious.

5.2.1 The changes proposed to this policy correspond with changes to policy RA2 (regarding internal floor area size limits), making the policy compliant with other policy changes in the plan. As we don’t consider the changes they relate to
contentious, the proposed changes to policy H2 are therefore accepted.

5.3 **Policy E4 (Tourism) – Modification MM052 – is considered SOUND as it was previously supported and the changes are relatively minor, not affecting the broad approach being taken.**

5.3.1 As an established and important sector of the local economy, the HDBoF contributes significantly to the tourism industry. It is responsible for managing a number of traditional and rural ecclesiastical buildings within its ownership which have a key role in heritage tourism.

5.3.2 The HDBoF previously supported the approach taken in policy E4. The changes are relatively minor, allowing for a range of accommodation, and do not impede the general ethos of the policy. Therefore, our position has not changed.

6.0 **Environmental Quality**

6.1 **Policy LD4 (Historic environment and heritage assets) – Modification MM057 – is considered UNSOUND due to an amendment to bullet point (4) in order to be fully compliant with national policy.**

6.1.1 The changes proposed to policy LD4 generally improves conformity with the Framework, with particular reference to paragraph 126 which states that local authorities “should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance [emphasis added]” and paragraph 129 which states “Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset)”.

6.1.2 However, bullet point (4), which relates to the recording and understanding of any potentially lost assets and refers to paragraph 141 of the Framework does not take the whole of paragraph into account and should read:

> “4. record and advance the understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact and to make this evidence or archive generated publicly accessible.”
This will enable full compliance with the Framework and prevent disproportional expectations on developers to undertake such work.

6.1.3 HDBoF have no objections to the newly added bullet point 5 which seeks, where appropriate, improved public access to heritage assets. The HDBoF welcome opportunities to further improve the understanding of the significance of the heritage assets, especially the ecclesiastical buildings within their ownership as well as tourism opportunities which improve their cultural significance.

7.0 Conclusion

7.1 Omissions

7.1.1 It should be noted that policies SS1 and SS5 were commented on in our previous consultation response in regard to the plan but have not be part of this submission. This is because there are no changes proposed to these policies and we had previously supported them. Also, there have been no relevant changes in national policy or guidance in relation to these policies.

7.2 Summary

7.2.1 This response has been submitted on behalf of the Hereford Diocesan Board of Finance, who are a significant land and property owner in Herefordshire.

7.2.2 The HDBoF has suitable sites for this type of small scale housing allocation within the following villages;

- Eardisland,
- Eardisley,
- Madley,
- Much Dewchurch,
- Weobley, and
- Withington.

7.2.3 The report comments on a number of policies and have found policies SS2, RA2, RA3, RA5, LD4 and paragraphs 4.8.28 and 4.8.44 to be unsound, when considered against the tests set out by the National Planning Policy Framework. Comments have been made for addressing the criteria or wording identified.
Smiths Gore
Taunton
t: 01823 445030
f: 01823 445031
taunton@smithsgore.co.uk