

Supplement to the agenda for

Planning and Regulatory Committee

Wednesday 9 September 2026

10.00 am

**Conference Room 1 - Herefordshire Council, Plough Lane
Offices, Hereford, HR4 0LE**

Schedule of updates

Public speakers

Pages

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PLANNING COMMITTEE

Date: 9 September 2026

Schedule of Committee Updates/Additional Representations

Note: The following schedule represents a summary of the additional representations received following the publication of the agenda and received up to midday on the day before the Committee meeting where they raise new and relevant material planning considerations.

SCHEDULE OF COMMITTEE UPDATES

251908 – CONVERSION OF THE STABLES INTO A DWELLINGHOUSE INCLUDING A ONE-AND-A-HALF STOREY SIDE EXTENSION, SINGLE-STOREY REAR EXTENSION, ALTERATIONS AND ASSOCIATED WORKS; AND CHANGE OF USE OF RESIDENTIAL CURTILAGE FOR THE SITING OF A GROUND-MOUNTED ARRAY OF 6 NO. PV SOLAR PANELS

251909 – CONVERSION OF THE STABLES INTO A DWELLINGHOUSE INCLUDING A ONE-AND-A-HALF STOREY SIDE EXTENSION, SINGLE-STOREY REAR EXTENSION, ALTERATIONS AND ASSOCIATED WORKS

AT LAND AT TOWN WELL, STATION ROAD, CREDENHILL, HEREFORDSHIRE, HR4 7DW

For: Justine Peberdy per Ms Hannah Welsh, Merchants House, Wapping Road, Redcliff, Bristol, BS1 4RW

ADDITIONAL REPRESENTATIONS

Also published at : [Planning Application Details - Herefordshire Council](#)

Following publication of the officer report for this agenda item, one additional letter of representation has been received in objection to the proposals (received 5 September 2026). For completeness, it is provided verbatim below with redaction shown where appropriate:

“Good Afternoon, XXXX.

Upon assessing the Report presented for the Town Well application, we have found numerous gaps regarding the Policy requirements of the new NFFP and other details which is of grave concern to us.

First point of discussion is the proposed Fencing as a solution to the intrusive invasion of our families' privacy; we do not condone this as a viable solution at all! We should not be forced into an enclosed, small private garden by an imposing fenceline that the applicant will install, or one that we would have to finance and install ourselves! That is not acceptable in any form.

This solution lacks any detail regarding materials, required height, positioning relative to our dry stone wall (listed via curtilage standards), or how the applicant will gain access to maintain the gap, preventing weeds, foliage growth and debris that could damage the wall over time. Furthermore, this solution isn't referenced in the excessive 55 individual drawings for this application so no representation exists to depict how this will look and affect us.

We would also like to highlight that text on images within the report document is illegible when trying to review it on a computer screen.

Before the Committee meeting on 9th September 2026, we have concluded that we must seek legal advice from a solicitor specialising in this field. We believe that if the committee accepts this application while it is still missing numerous vital independent reports from qualified entities, it will be a clear and obvious show of favoritism toward a council member.

Supporting their self-interest in this manner would be a manipulation of position and authority over the members of the public.

I would also like to make it abundantly clear we are not happy with how this process has exceeded a calendar year with it only now going to committee. The emotional and physical stress and strain this process has weighed upon us as parents within our family home has now taken its toll.

We also want it to be recorded that the applicants, since the initial engagement back at the end of July 2025, have made no attempt to engage in a constructive conversation to find a solution that would satisfy us with their proposed plans for the application.

We have found from this experience xx REDACTED xxxx. We also want to ensure that it is noted that, on the initial application, the applicant withheld the statement that a member of their household or immediate family member was a representative or employee of Herefordshire Council. After stating it was an agent's error, we find it difficult to comprehend that the applicant would not show basic due diligence in understanding the documents before editing a formal application.

We wish for these points to be added to the forthcoming committee meeting report for this application, so that all committee members can review our findings prior to our three minute objection statement in person.

Please see our assessment of the report below. We believe processes have not been followed from the application stage leading up to this point. We feel that this report does not answer any of the main Privacy or safeguarding concerns raised by the Parish Council or ourselves whatsoever.

We await your response on this no later than midday on Monday, 7th September.

Regards

Mr G Lake & Mrs L Lake.

COMMENTS RECEIVED:

Town Well Stables — Faults in the Officer's Committee Report

Applications P251908/F (Planning Permission) & P251909/L (Listed Building Consent)
Planning and Regulatory Committee, 9 September 2026

Prepared as supporting material for a 3-minute objection statement. All references are to page/paragraph numbers in the documents published on the Herefordshire Council planning portal.

Source documents:

- Application page: [Herefordshire Council planning search — 251908](#)
- [Committee Report, 9.9.26](#) (63 pages)
- [Heritage Statement, May 2025](#)
- [Design and Access Statement, June 2025](#)
- Historic England correspondence: [18 July 2025](#), [31 March 2026](#), [4 June 2026](#)

*The "economically vital" claim (Heritage Statement §3.2)
The Heritage Statement's Statement of Need (§3.1–3.2) does not classify or evidence the building as one that genuinely has "no viable use" other than residential conversion — it simply asserts that conversion is "economically vital." Under national heritage policy, a claim that a heritage asset's future can only be secured by allowing harmful change of use has to clear a specific evidential bar, commonly called the "optimum viable use" test (NPPF*

paragraph 215, quoted at Committee Report §7.73 onward, and Historic England Advice Note 2: Making Changes to Heritage Assets). To meet that bar, an applicant would normally need to submit:

- an independent structural/condition survey quantifying the "significant and urgent" roof repairs claimed;
- a costed viability appraisal comparing (a) the cost of minimal repair to keep the building wind-and-watertight in continued ancillary/storage use against (b) the cost of full residential conversion; and
- evidence of a marketing exercise or exploration of alternative viable uses (grant-funded repair via Historic England/National Lottery Heritage Fund, continued ancillary use, low-key commercial use such as a workshop/office) that would cause less harm to the listed fabric. None of this evidence exists anywhere in the application. The Committee Report itself concedes at §7.36: "Whilst a structural report has not been submitted with the application... the structure of the stables is considered reasonably sound." In other words, the council has no independent evidence of the "urgent" disrepair the entire justification rests on — it has simply repeated the applicant's own unverified assertion. That is not a demonstrated classification of economic unviability; it is a bare, self-serving assertion by the applicant's own paid agent, and it should not be given the weight the report gives it.

Separately, §3.2 also blurs together two materially different uses — "rented privately" (a permanent single household) or "as holiday accommodation" (a short-stay commercial letting operation) — as if they were interchangeable. They are not: they generate different occupancy patterns, traffic, noise and turnover, and the report itself admits this uncertainty (see Fault 6 below).

Faults in the Committee Report — bullet list with references

1. Historic England's non-engagement is misrepresented as an endorsement

- Historic England wrote three separate times (18 July 2025, 31 March 2026, 4 June 2026) declining to comment, stating explicitly: "we are not offering advice. This should not be interpreted as comment on the merits of the application." (Committee Report §4.2.1–4.2.3, quoting Historic England's own letters.)

- Despite this express disclaimer, the report's own section heading records this as "Historic England – No objections" (§4.2), and later cites Historic England among the "technical consultees" who raised "no concerns... in relation to the impact of the proposed development" (§7.82).

- This is a material mischaracterisation: Historic England never assessed the merits of the scheme at all. Recasting a national heritage body's explicit refusal to engage as a substantive "no objection" materially overstates the level of external scrutiny this Grade II listed building has actually received, and should be corrected before Members rely on it in the planning balance.

2. The central "economic necessity" claim is unverified and uncritically adopted

- The only evidence for urgent roof disrepair and financial unviability is the applicant's own Heritage Statement (§3.1–3.2) and Design & Access Statement (§2.7), both prepared by the applicant's paid agent (Crown & Canopy).

- The Committee Report admits no structural report was submitted (§7.36), yet elsewhere treats the disrepair/necessity claim as established fact: "Without conversion to a residential dwelling, this designated heritage asset will likely fall into disrepair" (§7.31, repeated at §7.65).

- This falls short of the "clear and convincing justification" required by NPPF paragraph 213 for harm to a designated heritage asset, and of the evidential standard normally expected to demonstrate "optimum viable use" under Policy RA5(1) of the Core Strategy, which requires the applicant to "demonstrate" — not merely assert — that conversion "represents the most viable option."

3. The Statement of Need presents a false choice, ignoring less harmful alternatives

- Heritage Statement §3.2 frames the only options as full residential conversion (private rental or holiday let) versus terminal decay. It does not consider or cost: continued ancillary/storage use with minimal wind-and-watertight repair (fundable by the same owners who already maintain the main listed farmhouse); grant-funded repair (Historic England/National Lottery Heritage Fund grants exist for at-risk listed buildings — no evidence is presented that the building is even on the Heritage at Risk Register); or a lower-impact alternative use (office, studio, workshop) that would not require full C3 residential conversion, extensions, new openings and associated curtilage/parking/amenity impacts.

- No marketing evidence or comparative options appraisal is included anywhere in the application documents.

4. Internally contradictory basis for approval: "no harm" vs "optimum viable use"

- At §7.83–7.84 the report concludes: "no effect has been identified on the significance, experience or setting of Town Well which includes no harm... the relevant 'public benefits' test... need not be undertaken."

- Yet the Summary/Planning Balance at §8.2 still relies on the scheme "securing an optimal viable use for this Grade II Listed Building" as a decisive benefit, and §7.61 states the "decision maker must weigh up the benefits of securing an optimal viable use... and the importance of safeguarding neighbouring amenity."

- These two positions cannot both be true. The "optimum viable use" concept under NPPF §215 only has relevance where harm exists and must be weighed against public benefit. A report cannot simultaneously claim there is no harm requiring justification, and rely on "optimum viable use" as a justification. This is a logical inconsistency in the reasoning used to reach approval.

5. No mechanism to secure the claimed "protection... in perpetuity"

- The applicant's entire justification for permitting harm to the listed fabric rests on securing the building's "protection and maintenance in perpetuity" (Heritage Statement §3.2, §6.4).

- Yet the 63-page report and its recommended conditions contain no condition or legal obligation tying the converted dwelling's occupation or ownership to Town Well, and nothing preventing it being sold immediately as a separate, self-contained open-market dwelling.

- Without such a tie, there is no enforceable guarantee that the stated public benefit (long-term heritage security) will actually be delivered — the applicant's own stated justification for the harm is not secured by anything in the decision.

6. The application's actual proposed use remains unresolved at the point of decision

- The Design and Access Statement (§3.2.1) states only that the application seeks a change of use to "Use Class C" — not a valid standalone classification, since the Use Classes Order defines separate C1/C2/C3/C4 categories.

- The Committee Report itself acknowledges the ambiguity: "the amended application form and description of development implicitly propose the use of the stable block as a dwellinghouse though officers understand the proposed use... may be intended for use as a holiday let" (§1.11), and states officers have simply chosen to assess it as C3 "for avoidance of doubt."

- Determining a heritage change-of-use application without a definitive answer on whether this is a permanent single dwelling or a commercial short-let operation undermines the residential-amenity assessment (§7.59, which relies on the untested assumption that it will only attract "couples rather than larger families/groups") and the "economic necessity" argument itself, which name-checks both uses interchangeably.

7. The Council's own Conservation Officer says the application lacks the detail needed for an informed decision

- The Principal Building Conservation Officer's consultation response records: "the detail contained within the application is considerably less than would usually be required for support for a listed building consent application despite requests for this information... Ideally this information or at least part of it should have accompanied the application in order for an informed decision to be made" (Committee Report §5.4.1).

- Despite this, virtually all technical heritage detail — masonry bonding and mortar mix, roof material samples, window head/cill profiles, joinery sections, and the methodology for reopening the blind windows — has been deferred to post-permission conditions rather than assessed before determination, contrary to the expectation in NPPF paragraphs 207–208 that the significance and impact of works on a designated heritage asset be understood at decision stage.

8. Heritage Statement relies on a superseded version of national policy

- The Heritage Statement (dated May 2025) cites "Paragraph 200 of the National Planning Policy Framework 2021" (§1.4). The Committee Report, assessing the same scheme under the NPPF "as amended on 17 August 2026," cites the equivalent (renumbered) provisions at paragraphs 207–219. The applicant's heritage case was never updated to reflect the current version of the policy it is supposed to satisfy.

9. Sustained, specific objections from the Parish Council and five neighbouring properties were not resolved, only "weighed"

- The report records ongoing, repeated objections through multiple rounds of amendment from Credenhill Parish Council and neighbours at 5 separate properties, covering overlooking/loss of privacy, harm to residential amenity, noise, and heritage impact (§6.1–6.3, §7.57 onward).

- Mitigations proposed in response (obscured glazing, a boundary fence, a noise management plan "if" used for holiday letting) are all left to be secured after permission is granted, via conditions, rather than resolved at application stage — meaning the committee is being asked to approve the principle before the amenity protections are actually fixed in detail.

Town Well Stables (P251908/F & P251909/L) — Privacy & Safeguarding Evidence
For the Planning and Regulatory Committee, 9 September 2026

This sets out, as objectively as possible, what the application documents and the Committee Report themselves record on privacy and safeguarding — including what has been resolved and what has not. All page/paragraph references are to the [Committee Report, 9.9.26](#).
Privacy — what the record shows

Context the report itself establishes: Herefordshire has no adopted Supplementary Planning Document setting minimum separation distances between windows/dwellings (§7.56: "In the absence of a Supplementary Planning Document for Herefordshire which defines acceptable separation distances, it is appreciated that a subjective view needs to be taken"). Credenhill Parish Council separately records that some neighbouring dwellings sit "as close as approximately 2 metres" from the proposed works (§6.1.2, consultation of 24 Dec 2025). So the privacy assessment in this report is explicitly acknowledged by officers to rest on subjective judgement, at genuinely very close range—not on any objective distance standard.

Points with evidence, in order of strength

1. A five-round objection record that privacy concerns remain unresolved at the point of recommendation. Credenhill Parish Council objected on privacy grounds in its 1st (13 Aug 2025), 3rd (21 Apr 2026), 4th (18 June 2026) and 5th (30 July 2026) consultation responses—the last of which states in terms: "none of the previously raised concerns... have been addressed. The revisions do not resolve the significant issues relating to privacy..." (§6.1.5). This is not one objection early in the process that was subsequently resolved—it is a sustained, repeated objection on the same point, maintained right up to the report going to committee.
2. Ground-floor windows on the north-west elevation, reopened from blocked openings, with clear glazing, directly facing Midsummer Barn. The Parish Council's 3rd consultation (21 Apr 2026) specifically objects to reopening previously bricked-up ground-floor windows with clear, openable glazing, stating this causes "directly overlooking into Midsummer Barn's private outdoor space, located immediately opposite... clear views into private living quarters, given the extremely close proximity between the buildings... a substantial loss of privacy for neighbouring residents at ground level" (§6.1.3, Point 1). By the 4th consultation (18 June 2026) the Parish Council confirms this is still live: "the ground floor re-opened windows continue to present significant privacy concerns for neighbouring properties" (§6.1.4).
3. First-floor north-west window left as clear, openable glazing. Officers' own account (§7.64) confirms only one first-floor window has been made non-openable and obscured. The Parish Council's 4th consultation flags this directly: "one window remains clear and openable... These remaining window[s] with clear glazing should be reconsidered, or amended to obscured glazing and/or restricted opening" (§6.1.4). This was not accepted before the report went to committee.
4. First-floor south-east window overlooking 7 Centurion Way, accepted on officer judgement alone, against sustained objection. Raised by the Parish Council in its 2nd (24 Dec 2025) and 4th (18 June 2026) consultations — the latter stating "nothing has been done to mitigate overlooking of the neighbouring property and therefore privacy issues (SD1) have not been addressed" — officers conclude at §7.67 only that the viewing angle is "limited", without imposing any obscuring-glazing condition equivalent to the one used elsewhere in the same scheme (the NW window). No technical assessment (e.g. sightline/overlooking diagram) is referenced to support that conclusion.
5. Elevated structures (balcony, external staircase) identified as a privacy issue from the outset. The Parish Council's first consultation (13 Aug 2025) specifically names "upper-storey windows, balconies, and elevated structures that directly overlook neighbouring gardens and living spaces" (§6.1.1) as a cause of "significant loss of privacy." The applicant's own Design & Access Statement asserts the balcony is positioned "to avoid overlooking," but this is the applicant's own claim, not an independently verified assessment. Safeguarding — what the record shows

This is the more significant gap, and it is worth committee members' particular attention because it was raised formally, in writing, by name — and does not appear to have been answered anywhere in the officer's appraisal.

1. A specific, written safeguarding concern was raised three times and never addressed in the officer's appraisal

Credenhill Parish Council raised the same point in three separate, dated consultation responses:

"Future Use as Short-Term Rental... If the property is developed as intended use as a short-term rental (e.g. AirBnB), could raise potential safeguarding issues for families associated with the nearby military barracks (HQ Hereford Garrison), as well as potential noise and antisocial behaviour affecting surrounding properties within such close proximity." — §6.1.2 (24 Dec 2025)

Repeated in near-identical terms at §6.1.3 (21 Apr 2026): "Concerns remain that short term letting could lead to safeguarding issues, noise, antisocial behaviour, and increased parking pressures. Request: Clarification of intended use, and if necessary, a condition preventing short term holiday letting."

And again flagged as unresolved at §6.1.4 (18 June 2026), listed among the Parish Council's outstanding concerns going into the final rounds of the application.

This safeguarding concern is not mentioned anywhere in Section 7 (Officer's Appraisal), which runs to over 90 numbered paragraphs. The only paragraph addressing holiday-let use at all, §7.59, deals exclusively with noise: "further controls can be secured by condition by way of a noise management plan should the property be used for such purposes." The safeguarding point — raised in writing, three times, by the parish's elected representatives — receives no response, rebuttal, or even acknowledgement.

2. The word "safeguarding" is used elsewhere in the report in a different, unrelated sense — which risks the Parish Council's point being overlooked entirely

The report separately records that the Ministry of Defence has "no safeguarding objections" to the proposal (§4.3.2) and that the site sits within "the technical statutory safeguarding zone surrounding MOD Credenhill." This is a technical planning term referring to protecting defence assets and operations (radar, explosives storage, low-flying corridors) from being compromised by nearby development — it has nothing to do with the welfare or security of families living near the base. A reader moving quickly through the report could mistake the MOD's "no safeguarding objections" for a response to the Parish Council's welfare-safeguarding concern. They are not the same issue, and the MOD's comments do not touch on it at all.

3. The only condition governing holiday-let use addresses noise only, not safeguarding
Condition 14 of the recommended planning permission states: "In the event that the dwellinghouse is occupied for the purposes of short-term holiday accommodation, a Noise Management Plan shall first be submitted to and approved in writing by the Local Planning Authority prior to first use." There is no condition addressing occupant turnover, verification, or any other safeguarding-related control — despite this being the specific, named concern raised by the Parish Council.

4. The application itself leaves the end-use undetermined, which is precisely what makes the safeguarding question live

The Committee Report acknowledges at §1.11 that "officers understand the proposed use of the dwellinghouse may be intended for use as a holiday let" but that they have chosen to assess the application on the basis of ordinary C3 dwellinghouse use "for avoidance of

doubt." This means the very risk profile the Parish Council was concerned about — unknown, rotating short-term occupants living a few metres from neighbouring family homes and next to a Special Forces base — has not actually been assessed on its own terms at all. It has been assumed away.

5. Construction-phase welfare impact on children was raised and only generically mitigated. The Parish Council's 2nd consultation (24 Dec 2025) states that construction disruption "is not acceptable for neighbouring families, who may be forced to restrict their children from using their own gardens for extended periods," citing likely scaffolding, high-level works and "potentially crane operations," and that "continuous noise, dust, and general disruption... will have a detrimental effect on the mental wellbeing of young children and adults living adjacent to the site" (§6.1.2, Point 5). The officer's response is a standard construction working-hours condition (§7.58) — there is no child-specific mitigation, and no acknowledgement of this point in the officer's appraisal narrative.

6. Fire risk and emergency access next to an occupied bedroom was raised three times and delegated outside the planning system

The Parish Council raised concerns in three consultations (24 Dec 2025, 21 Apr 2026, 18 June 2026) that the proposed parking bay sits "immediately beside a neighbouring bedroom wall," citing "fire risk from petrol/diesel vehicles and EVs" and "restricted emergency access due to the tight layout." Officers' response (§7.69–7.70) is that "fire safety considerations relating to vehicle construction, fuels and electric vehicle batteries are primarily addressed through Building Regulations and other legislative controls rather than the planning system" — with no independent fire-risk assessment commissioned or referenced, despite this directly concerning the safety of people sleeping in the adjoining bedroom.

Summary for use at committee

- Privacy: the Parish Council's objection on overlooking has been raised and maintained across five separate rounds of consultation and was still recorded as unresolved in the final round before this report was written. Only one of several contested windows has been fully mitigated (obscured glazing); the rest have been accepted on officer judgement, in the explicit absence of any adopted distance standard, at separations as close as approximately 2 metres.

- Safeguarding: a specific, named safeguarding concern — the risk of unvetted, transient short-term-let occupants living immediately next to families connected to the adjacent MoD site, was raised in writing three times by the Parish Council and does not appear to have been considered anywhere in the officer's 90-paragraph appraisal. The only condition addressing holiday-let use covers noise, not safeguarding. This is a material consideration that appears to have gone unanswered, and is a legitimate matter to put to the committee directly."

The applicants' agent has provided the following correspondence on behalf of the applicant (received 1 September 2026) which is also provided for completeness below.

"The clients have also passed on some comments in relation to the outstanding objections as follows.

'scale of the glass house', 'the structure continues to appear large in scale relative to the listed barn'.

There is an existing greenhouse (12m x 3m). The slight increase in the scale of the glass house from the existing greenhouse was at the specific request of the Heritage Officer in order to be more sympathetic to the heritage building. The glass house is only seen from the

SE elevation, the wall of the walled garden hides the glass house from the SW elevation. This is difficult to show in the drawings.

'proposed addition of a 1st floor window on the south-east elevation remains unchanged. Nothing has been done to mitigate overlooking of the neighbouring property and therefore privacy issues (SD1) have not been addressed'

The proposed window on the SE elevation does not overlook any neighbouring property. The drawing of the SE elevation cannot clearly show the distance of the new window from the neighbouring property because the Barn is not at right angles to the boundary wall.

'remaining windows with clear glazing should be reconsidered, or amended to obscured glazing and/or restricted opening to protect residential amenity'

This remaining historic glazed window is retained at the recommendation of the Heritage Officer.

'That the parking layout be reconsidered to reduce amenity and safety impacts.'

The existing parking arrangement is in front of the existing wall and immediately adjacent to neighbours garden space. This is improved by the removal of the wall and the relocation of the car parking space behind the windowless wall of the neighbours house, out of sight and further away from the neighbours garden and living space.

'Scale and noise impact of glass house'

The proposed accommodation is one bedroom (2 people). The current arrangement is garden space for a 6 bedroomed house. No additional noise impact is anticipated with the new arrangement.

The Tree Officer's further comments mention a 'mature broadleaved tree'... 'The applicant has selected the option for "NO" on both tree related questions in their application.

This appears to be an inaccurate declaration and should require amending before this application can be finalized.' We were advised by the ecologist that this is a tall shrub and it is labelled as a 'tall shrub' on the Bat Survey. This was the reason that we did not mark it as a tree on the application."

OFFICER COMMENTS

The additional third-party representation has been reviewed and officers consider that the majority of the matters raised have either already been addressed within the committee report, matters which can be controlled through recommended planning conditions, or relate to matters that fall outside the scope of the planning regime or are non-material planning considerations. The submission also raises a number of points challenging aspects of the officer assessment and interpretation of national and local planning policy.

In respect of the proposed privacy fencing, Condition 3 as drafted requires the submission and approval of detailed plans, elevations and cross-sections prior to the commencement of any works. This will enable the Local Planning Authority to fully consider the precise siting, height, appearance, relationship with existing boundary features and any associated impacts before any fencing is installed. The submission of details pursuant to this condition does not prejudice the outcome of that assessment, and approval would only be granted where the Authority is satisfied that the proposed works are acceptable. It is also noted that a degree of mutual overlooking between residential properties is not uncommon within built-up environments. The committee report addresses residential amenity matters in detail at paragraphs 7.55 to 7.71, including consideration of representations received from Credenhill Parish Council and neighbouring occupiers. Officers remain of the view that, subject to the recommended conditions relating to obscured glazing, non-opening windows and boundary treatments, the proposal would safeguard residential amenity to an acceptable degree.

Whilst alternative conclusions may reasonably be reached by interested parties, officers consider the assessment set out in the report to be proportionate and consistent with relevant planning policy and guidance including the adopted development plan and having regard to the NPPF, as amended.

Reference is made to the absence of technical assessments relating to overlooking and privacy impacts. There is no Supplementary Planning Document prescribing a specific methodology for assessing such matters. Consideration therefore necessarily involves the exercise of planning judgment having regard to the characteristics of the site and surrounding area. Members are entitled to reach their own conclusions on these matters and members have undertaken a site inspection of the application site on 8 September 2026 to view the subject building and its immediate surroundings.

Concerns regarding the legibility of certain images reproduced within the committee report are noted but the inserted plans are included primarily as an aid to identifying key plans and proposals. Members and interested parties have access to the complete suite of application drawings and supporting documentation published on the Council's website that are linked within the officer report.

Concerns have been raised regarding the absence of a structural appraisal, viability assessment, marketing evidence and alternative use analysis. As set out in the report, officers are satisfied that sufficient information has been submitted to enable the applications to be determined and that the proposals can be assessed against the relevant development plan policies and national planning policy relating to the historic environment. Policy RA5 of the Herefordshire Local Plan – Core Strategy does not prescribe a requirement for the submission of marketing evidence or a formal viability appraisal and whilst acknowledging national decision-making policy HE6 of the NPPF, officers as set out in the report do not consider the proposal would cause substantial harm to, or the total loss of, the significance of a designated heritage asset. The officer assessment has been undertaken having regard to the condition of the building, its heritage significance, its suitability for continued use or conversion, the development plan, and the specialist conservation advice received.

Members should also note that the reference to securing an "optimum viable use" within paragraph 8.2 of the committee report is not relied upon as determinative justification for approval. Rather, officers have undertaken an overall planning balance in accordance with the relevant national decision-making policies and the presumption in favour of sustainable development as set out within S3 and S4 of the NPPF. Officers have concluded that the proposal would preserve the significance of the designated heritage assets and would not result in harm to their significance. The reference to viable use forms part of the wider assessment under Policy RA5 concerning the long-term conservation of the building.

The representation also highlights that Historic England provided no comments on the application rather than expressly stating that it had no objections. The committee report reproduces consultation responses in full, enabling members to consider those responses in their entirety. In reaching a view on heritage matters, officers have had regard to the advice of the Council's Principal Building Conservation Officer and clearly acknowledge that Historic England offer no bespoke comments.

The representation disputes the conclusion that the proposal secures an appropriate long-term use for the listed building and contends that alternative uses have not been adequately explored. The Local Planning Authority is required to determine the applications before it on their planning merits. It cannot require an applicant to pursue an alternative form of development that has not been proposed. For the reasons set out at paragraphs 7.27 to 7.41 of the committee report, officers remain of the view that the proposed reuse represents an acceptable means of securing the long-term conservation and ongoing use of the building.

Concerns have been raised regarding the amount of detail submitted in support of the Listed Building Consent application. Officers acknowledge that the Council's Principal Building Conservation Officer indicated that further detail would be desirable. However, the consultee advises that sufficient information exists to support the principle of development subject to appropriate conditions. The use of relevant commencement conditions requiring the subsequent approval of more precise details is a recognised and common practice.

The representation questions the proposed end use of the building and raises concerns regarding potential occupation as holiday accommodation. As identified within the committee report, the application has been assessed as a Use Class C3 dwellinghouse. Certain forms of serviced accommodation may also fall within Use Class C3 depending upon their scale and operational characteristics. Whether any future use amounts to a material change of use is ultimately a matter of fact and degree. The recommendation includes Condition 14 requiring a Noise Management Plan should the property be used for short-term holiday accommodation and note that the Council's Environmental Health service also has separate statutory powers and duties under the Environmental Protection Act 1990 in relation to allegations of statutory nuisance.

Concerns relating to safeguarding and the potential implications of short-term occupancy have been noted. In having regard to national decision-making policies P3, P4 and P5 of the NPPF, officers do not consider the proposal to represent an incompatible land use that would give rise to unacceptable impacts on neighbouring occupiers or military operation. No objection has also been received from the Ministry of Defence in its capacity as a statutory consultee and cumulative impacts have also been considered in reaching this view. Subject to the recommended conditions, these matters are considered capable of being appropriately addressed through the planning process. Planning controls relate principally to the use and development of land rather than the identity or personal characteristics of future occupiers.

Potential impacts arising from construction activities, including noise, dust, site operations and working practices have been considered. Conditions are recommended relating to construction management, waste management and construction hours. Any temporary disturbance must also be considered in the context of the finite duration of construction works and the availability of separate regulatory controls where necessary.

Concerns regarding fire safety, parking arrangements and emergency access have been considered though many of these matters are primarily governed through alternative regulatory regimes, including Building Regulations. National decision-making policy DM7 states that decision-makers should assume, unless there is clear evidence to the contrary, that those separate regimes will operate effectively. Officers are not aware of evidence demonstrating unacceptable planning harm arising from these raised issues.

The representation also raises concerns regarding the duration of the planning process. Officers are satisfied that the applications have been processed in accordance with statutory requirements and the Council's published procedures. The applications are reported to the Planning and Regulatory Committee in accordance with the Council's Constitution and have been assessed on their planning merits.

In respect of alleged deficiencies relating to policy requirements and validation matters, officers are satisfied that the relevant national validation requirements have been met. Members are also reminded that Annex A paragraph 2 of the revised National Planning Policy Framework (published 17 August 2026) confirms that development plan policies that are materially inconsistent with national decision-making policies should attract limited weight, whereas policies that remain broadly consistent may continue to attract weight according to the decision-maker's planning judgment. The committee report expressly addresses the weight officers consider should be attributed to the relevant development plan policies in light of the revised NPPF. The representation principally also disputes the adequacy, interpretation and weight attributed to certain evidence and planning

considerations. However, these are ultimately matters of planning judgment upon which reasonable persons may reach differing conclusions depending on weight that is afforded to such considerations that is a matter for a decision-maker to give.

Having reviewed the additional submission in full, officers consider that it does not alter the assessment, planning balance or recommendation contained within the committee report unless stated above. Members are nevertheless invited to have regard to the representation as a material consideration alongside all other consultation responses and representations received.

The comments from the applicants' agent on behalf of the applicant raises no new material considerations. These have extensively been covered within the officer report and above.

Finally, with regard to the officer appraisal, Paragraph 7.14 misses off the end of Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 in terms of decisions on listed building consent application. The relevant legislation ([Planning \(Listed Buildings and Conservation Areas\) Act 1990](#)) is inserted below for avoidance of any doubt:

"16 Decision on application.

(1)Subject to the previous provisions of this Part, the local planning authority or, as the case may be, the Secretary of State may grant or refuse an application for listed building consent and, if they grant consent, may grant it subject to conditions.

(2)In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

(3)Any listed building consent shall (except in so far as it otherwise provides) enure for the benefit of the building and of all persons for the time being interested in it."

NO CHANGE TO RECOMMENDATION

261671 - CREATION OF A WC WITHIN THE UTILITY ROOM ON THE GROUND FLOOR, THE INSTALLATION OF A TOILET AND SINK AND ASSOCIATED WORKS AT TOWN WELL, STATION ROAD, CREDENHILL, HEREFORD, HR4 7DW

For: Mrs Justine Peberdy, Town Well, Station Road, Credenhill, Hereford, Herefordshire HR4 7DW

OFFICER COMMENTS

Members are reminded that, following the publication of the revised National Planning Policy Framework on 17 August 2026, Annex A paragraph 2 confirms that development plan policies which are materially inconsistent with national decision-making policies should be afforded very limited weight, whereas policies that remain broadly consistent should continue to attract weight according to a decision-makers' planning judgement.

The Committee Report expressly addresses the weight officers consider should be afforded to the relevant development plan policies in light of the revised NPPF.

NO CHANGE TO RECOMMENDATION

260149 – REMOVAL OF CONDITION 4 OF PLANNING PERMISSION 240468 (PROPOSED RESIDENTIAL DEVELOPMENT OF 8 NO. DWELLINGS WITH ASSOCIATED ACCESS, PARKING AND LANDSCAPING) AT LAND SOUTH EAST OF GREYHOUND CLOSE, LONGTOWN, HEREFORD, HEREFORDSHIRE.

For: Ms Price per Mr Geraint John, Office 16 (House 1, 2nd Floor), The Maltings, East Tyndall Street, Cardiff, CF24 5EA

ADDITIONAL REPRESENTATIONS

Following publication of the officer report for this agenda item, three further letters of representation have been received in objection to the application raising the following issues that have been summarised below:

- Adverse impacts on water supply and water pressure; and
- Sewerage treatment works not fit for purpose, causing waste to leak directly into the river, putting health at risk.

OFFICER COMMENTS

The representations raise no new material considerations. The issues raised have been covered within the officer report appreciating that the condition proposed to be removed does not alter the drainage characteristics of the approved development.

Members are reminded that, following the publication of the revised National Planning Policy Framework on 17 August 2026, Annex A paragraph 2 confirms that development plan policies which are materially inconsistent with national decision-making policies should be afforded very limited weight, whereas policies that remain broadly consistent should continue to attract weight according to a decision-makers' planning judgement. The Committee Report expressly addresses the weight officers consider should be afforded to the relevant development plan policies in light of the revised NPPF.

NO CHANGE TO RECOMMENDATION

PLANNING AND REGULATORY COMMITTEE

9 September 2026

PUBLIC SPEAKERS

Ref No.	Applicant	Proposal and Site	Application No.	Page No.
6	Justine Peberdy per Ms Hannah Welsh	Conversion of The Stables into a dwellinghouse including a one-and-a-half storey side extension, single-storey rear extension, alterations and associated works; and change of use of residential curtilage for the siting of a ground-mounted array of 6 no. PV Solar Panels at LAND AT TOWN WELL, STATION ROAD, CREDENHILL, HEREFORDSHIRE, HR4 7DW	251908/251909	17
		PARISH COUNCIL OBJECTOR SUPPORTER	MR BURRIDGE (Credenhill Parish Council) MR LAKE (Local Resident) MS PEBERDY (Applicant)	
7	Mrs Justine Peberdy per Mrs Justine Peberdy	Creation of a WC within the utility room on the ground floor, the installation of a toilet and sink and associated works at TOWN WELL, STATION ROAD, CREDENHILL, HEREFORD, HEREFORDSHIRE, HR4 7DW	261671	81
		SUPPORTER	MS PEBERDY (Applicant)	
8	Ms Price per Mr Geraint John	Removal of condition 4 of planning permission 240468 (Proposed residential development of 8 no. dwellings with associated access, parking and landscaping) at LAND SOUTH EAST OF GREYHOUND CLOSE, LONGTOWN, HEREFORD, HEREFORDSHIRE	260149	99
		PARISH COUNCIL OBJECTOR SUPPORTER	MS CECIL (Longtown Parish Council) MR ARTHUR (Local Resident) MR JOHN (Applicant's agent)	

