

Whitchurch & Ganarew Neighbourhood Plan

Consultation Statement – January 2018

Issue 1

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1. Introduction

- a. The Neighbourhood Planning (General) Regulations 2012 (Localism Act 2011) require a Consultation Statement to set out the consultations undertaken for the NDP.
- b. Part 5 Paragraph 15 (2) of The Neighbourhood Planning (General) Regulations 2012, defines a Consultation Statement as a document which includes:
 - i. details of the persons and bodies who were consulted about the proposed NDP.
 - ii. a description of how they were consulted
 - iii. a summary of the main issues and concerns raised by the persons consulted
 - iv. a description of how these issues and concerns have been considered and, if appropriate, addressed in the proposed plan.

(PLEASE NOTE: public and stakeholder input was taken into account throughout the development of the plan. Specific examples of where and when this has happened are highlighted in the timeline below with relevant extracts from, or references to, steering group minutes. For the sake of brevity, not all instances are listed, but are available by searching the full set of minutes on the NDP website [here](#).)
- c. Guidance from Department for Communities and Local Government (10 Sept 2013) states that: *'the Consultation Statement submitted with the draft Neighbourhood Plan should reveal the quality and effectiveness of the consultation that has informed the Plan proposals.'*
- d. This Statement sets out details of all consultation and engagement activity. It lists how the local community and other stakeholders have been involved and how their input has informed the development of the Plan.
- e. The aim of the consultations in Whitchurch & Ganarew parish has been to ensure the widest possible understanding of the purpose and content of the Neighbourhood Plan, and to ensure that every resident and stakeholder had the opportunity to contribute to the development of the Plan.
- f. This Statement demonstrates that there has been extensive community and stakeholder engagement and consultation throughout the process. There is evidence available to support all the statements regarding consultation summarised below.
- g. The community and stakeholders were kept informed and engaged via a range of media which are laid out in the Timeline below. These included a dedicated website, noticeboards, fliers, banners, exhibitions and drop-in events. Steering Group Meetings were also open to the public to attend, ask questions and make comments. Up until January 2017 the Steering Group also had a reserved page in the

Village News which went to every household on a monthly basis. From January to November 2017 the parish council produced a quarterly “Parish News” pamphlet that was delivered to each household, which included updates on the Neighbourhood Plan’s progress and related points of interest. From November 2017 the parish council transferred the publication to the WAGPC (parish council website), with paper copies being made available to individual parishioners upon request. The Whitchurch & Ganarew NDP website also has to-way links from other local websites.

Section 2 follows

2. Whitchurch & Ganarew NDP Consultation Timeline

Note: Although the Whitchurch & Ganarew NDP process began in 2013, progress was slow in the early stages. This was mainly due to:-

- *Whitchurch & Ganarew wishing to complete its Parish Plan as part of the evidence base for the NDP*
- *The NDP Steering Group awaiting the finalising of the Local Plan (Core Strategy) before proceeding to detailed policy making. (The Local Plan was not “made” until 2015).*

1	8th Oct 2013	The application for designation of the Neighbourhood Plan Area was made in October 2013
	Parish Council	
2	22nd Oct to 3rd Dec 2013	The consultation on the designation commenced on 22 nd October and closed on 3 rd December 2013.
	Herefordshire Council	
3	4th Dec 2013	No representations received during the 6-week consultation period. Designation approved.
	Herefordshire Council	
4	January to November 2014	Activity was then suspended to enable the completion of the Parish Plan
	Steering Group	
5	1st Dec 2014	Formation of steering group and election of officers, including a Chair, Project manager, financial controller and publicity officers. Terms of Reference were submitted and approved. Funding sought from Locality to purchase a laptop, printer and display boards, to facilitate good communications throughout the project. A draft programme for the NP was confirmed by the steering group.
	Steering Group	

6	January 2015	Dedicated NDP website in development at www.wagpcnp.org.uk/
	Publicity	This included the project plan as a 7-stage process. This programme can be viewed from the “Project Plan” drop-down menu on the home page of the website at http://www.wagpcnp.org.uk/index.html
7	February 2015	Preparation for a public meeting to be held on 26 th Feb. including hand-delivered leaflets/invitations to all households and posters around the parishes.
	Publicity	
8	28th Feb./ 1st Mar. 2015	First public meetings to initiate the start of the NP programme. Publicised through Village News, Border Press, Website and hand delivered notices. These were drop-in events where the public could view themed displays on Housing, Economy, Employment and Tourism, Roads and Transport, Community, Leisure and Sport, Natural Environment, Heritage and Built Environment. Material from the recently published Parish Plan was incorporated into the themed displays. Over 200 people attended over the Saturday and Sunday (9.3 am till 5 pm). A number of volunteers were recruited at this event to assist with the thematic work and the delivery of the Parish Plan. The feedback received was collated and a summary of the main points was posted on the website here .
	Public Meetings	
9	July 2015	Commencement of Natural Environment investigation and development. Three members of the public volunteered to assist.
	Steering Group	
10	March to September 2015	Thematic sub-groups gathering information and reporting back to Steering Group on progress. These individually themed reports were added to the website and regularly updated. They can be found under the “Theme” Drop-down menu on the home page of the website at http://www.wagpcnp.org.uk/index.html
	Steering Group & Sub-groups	
11	9th Sep 2015	Draft NDP community questionnaire distributed to the steering group for consideration.
	Steering Group	

12	October 2015	Draft Questionnaires was discussed and decision made to delay until after further data had been gathered from the community and existing data sources had been fully investigated.
	Steering Group	
13	15th Feb 2016	Thematic research added to NDP website to be used as part of a Community Presentation Event planned for May. Publicity arranged for the Event included hand-delivered leaflet to all households.
	Steering Group	
14	14th March 2016	Extract from the minutes regarding preparation for Community weekend 14 / 15 May 2016:- “Advertising arranged for April 2016 Border News / double page advertisement hand delivered to all households / notice boards / and local shops etc. The weekend before the event banners to be displayed at selected locations. The village school will be approached to highlight the event in their weekly message to parents”.
	Steering Group	
15	May 2016	Following the work of the steering group’s themed sub-groups a Preliminary Evidence base report was published. This was used to inform the public events of 14 th and 15 th May outlined at Activity 15 below. The Report was made available on the website and can be viewed here .
	Communications	
16	14th /15th May 2016	Second public /community event. Communication via Border Press and website. Attendees over the Saturday and Sunday (9.30 am till 4 pm on both days) was 126, attendance sheets with names available for examination. Positive feedback was received regarding the quality and content of the presentations and organisation of the events. The themed presentation material for these events can be seen here .
	Public Events	
17	June 2016	A pack of questionnaires was delivered by hand by volunteers to all households in the 2 parishes. The pack included an Adult Survey (one per person aged 16 years or over), a Call for Sites (“Land Availability”) Survey (one per household), and a “Future Housing Needs” Survey (one per household). The questionnaires were collected by volunteers 2 weeks later. A collection box was also provided at the “Woods of Whitchurch” local shop. 305 completed Adult Questionnaires were returned (31% of adults aged 16 years or over). The blank residents’ questionnaire can be seen as an appendix to the Survey Report here . 50 “Future Housing Needs” were returned. 77 “Land Availability” questionnaires were returned. As part of the Housing Theme Group’s review of potential housing land, these returns were later supplemented with Land availability (Call for Sites) forms being made available at public consultations and via the NDP website. <i>(See Activity 19 below)</i>
	NDP Surveys	

18	September 2016.	The results of the surveys (“Adult”, and “Future Housing Needs”) made available to the steering group. The Land Availability results were sent direct to the parish council. The Adult and Future Housing Needs Reports were published on the NDP website at http://www.wagpcnp.org.uk/wagpcNP-20-Evidence.html .
	Survey Results	
19	3rd Nov. 2016.	An update was given on further call for sites postal returns, with 21 additional sites having been submitted and being processed.
	Steering Group	
20	Dec 2016 to Oct 2017	Period of policy development
	SG meetings	
21	17th October 2017	A member of the steering group attended the adjacent Marstow Parish Council meeting (Marstow / Glewstone / Pencraig) and reviewed the main elements of the proposed Whitchurch and Ganarew Group Neighbourhood Plan and its development.
	Consultation	
22	24th Oct 2017	Special meeting between the Parish Council and the NDP Steering group to present and discuss the draft NDP. It was recommended that early 2018 would be the best time for the Regulation 14 public consultation. In the meantime a flyer would be prepared announcing this consultation for delivery to every household in the Parish prior to Reg 14 consultation period commencing.
	SG meeting and publicity	
23	18th Dec 2017	The meeting discussed arrangements for a publicising the Reg 14 Public Consultation, including public notices and reserving the Whitchurch Memorial Hall for the public consultation event.
	Steering Group	
24	29th March 2018	Public Consultation Flyer presented and sent to the printers. It would be available for distribution from 5 April 2018. Confirmation of the Memorial Hall being booked for the public consultation on 21 April and 5 May 2018.
	Steering Group	

25	April 2018	All flyers were distributed to all households. All consultation partners and agencies were sent the appropriate email and attachments required.
	Publicity	
26	9th April 2018	Regulation 14 six-week consultation opened at 8.00 am on 9th April 2018 and closed at 12.00 noon on 21st May 2018. A response sheet was made available on the website, in Word and pdf formats at http://www.wagpcnp.org.uk/documents/The%20Plan/NDP%20Response%20sheet%20(draft).pdf Hard copies of all material used were made available at 6 locations – Ross Library, Old Court Hotel, Village Shop, Ye Old Ferry Inn, St Dubricius Church, and the local Daff-y-Nant Service Station. Although the pack did not contain the SEA and HRA, it did include a request form informing how they could be accessed from the website or how to request a hard copy.
	Consultation	
27	21st April and 5th May 2018	Regulation 14 consultation period opens and closes. Two 6-hour drop-in events were held at the Village Hall on Saturday and Sunday. The sessions were supported by steering group members. The material used included the draft NDP, the Housing Report. Feedback/comments sheets were provided on request. Approximately 30 people attended.
	Public Events	
28	31st May 2018	All Steering Group members and the consultant Data Orchard processed all the consultation responses both from the major stakeholders and local residents. The task of considering the responses and re-drafting the plan for Regulation 16 commenced. The Representations received, and the alterations made, can be seen in Sections 3 and 4 below
	Steering Group	

Section 3 follows below

Section 3

Whitchurch and Ganarew Neighbourhood Development Plan

Schedules of Representations in response to Draft Plan, October 2018

Schedule 1: Community Representations and Response

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
C.1 A Lowther	Housing policy and strategy	Suggest change	<p>A huge thank you to the team who have put in so much time to produce such a professional piece of work. I am not a property developer nor with any aspirations to become one, I write in the firm belief that W&G parish should support the building of more houses for the benefit of the locals as well as for the nation. I was disappointed that the majority of the respondents were against W&G making a greater contribution to the national and local housing shortage. I would like to argue the case that the proposal to limit the number of new properties is mistaken.</p> <p>As the Plan points out the parish has already nearly hit its target for houses built or in planning and this is being achieved with minimal disruption and negligible effect on the much vaunted “character of the area”. Surely this demonstrates that we could be more ambitious in our targets for housing? This will benefit the local businesses, support sustainability of the local organisations as well as make some small dent in the ever-rising house prices created by lack of supply vs demand. I do not believe that the size of the homes matters, small or large, just get them built. I would suggest we should aim for a mere 50% more than the current target over the period.</p> <p>Some may say W&G parish is too small to make an impact on housing; I would hope that we could be proud to say that we were not so mean and self-interested that we did not at least try to make a positive impact.</p> <p>The NDP has been prepared having sought the views of the community as a whole. The approach to housing provision advocated is considered the most appropriate approach aimed at meeting the overall view of the community while recognising that the target set is a minimum. However, it is accepted that some further flexibility in order to provide for local needs might be afforded. This does have to take into account that both Whitchurch and Symonds Yat West fall within the Wye Valley AONB where there are national policies aimed at protecting its environment.</p>	See Change No 10
C.2 E Atkinson	Policy WG5	Objection	<p>"Map 3: Proposed Symonds Yat West Settlement Boundary" of the neighbourhood plan that it described an area which no further development could take place.</p> <p>For example reading previous planning refusals on the Ashes and Meeks Well Lane as well as the Drag Road the Authorities pointed out the inadequate transport and service infrastructures of water, sewage, electricity and telephone as the reasons for refusal. Of course these insurmountable issues are a result of the unique geology and morphology of the area e.g. lower Ashes Lane lies on the junction of the Herefordshire soft Red Sandstone and the Quartz Conglomerate and Meeks Well Lane is on the Quartz Conglomerate and Tintern Red Sandstone boundary. Whilst these strata support a varied flora and fauna which contributes to the uniqueness of the Area it brings with it structural concerns.</p> <p>If the Map 3 contains areas on which planned development should take place then it would not only be a grave mistake from a structural and support point of view but a dreadful environmental error.</p>	No change proposed as a consequence of this representation

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			<p>I would just like to add that in the "Statement" the committee has made about the Doward Roads, " The lanes are poorly maintained" is totally inadequate and potentially misleading. The lanes are not just poorly maintained. As unadopted highways they can never sustain the increased traffic as proposed in the development plan. The "Statement" shows a complete lack of knowledge of the local situation. Just to allow the HCC contractors to work on a crumbling section of the Drag Road/Meeks Well Lane some years ago they they had to put down 20 inches (half a metre) of reinforced concrete, 40 inches wide down a length on the dip side of Ashes Lane from my house to the B road (400 metres) - one third of the width! That was a temporary support and there was no drainage provision! I would also like to add that the speed limit on the Doward Lanes (with no street lights) is 60 mph - improve the roads at your peril.</p> <p>As a prerequisite to any further development the lanes need to adopted by the local Authority and built to the appropriate standard. I would suggest the cost is prohibitive; drainage alone would blow them out of the water.</p> <p>After all the time and effort the committee members have given for the local community, for which I thank them, I would be deeply saddened if the lack of gravity viz a viz the condition of the Doward Lanes was used and objections dismissed in any planning permissions that were lodged and somehow based on one particular weakness of their report. As a community we need to square this away.</p> <p>The NDP should be read as a whole and there are specific requirements set out for Symonds Yat West, and more generally, in relation to matters such as capacity of the highway network that would apply to development within that settlement. Symonds Yat West has been identified by Herefordshire Council as a location where new housing growth would be appropriate. The criteria within policy WG5 sets out a number of criteria to be met in order to retain the areas character. Other policies in the plan cover highway requirements including the capacity of local roads (WG21)</p>	
C.3 J Hubbard	Paragraph 3.4	Comment	<p>Moved here from Stratford due to not wanting to be around lots of housing. Do not want any housing areas because they contradict paragraph 3.4 – Conserve natural environment and heritage.</p> <p>Herefordshire Council has set a minimum housing requirement that must be provided for and by producing a NDP with housing allocations, the community is best able to ensure the development that it must accept is located in the most appropriate locations. This has been done in the way that it is felt best retains the natural environment and heritage.</p>	No change proposed as a consequence of this representation
	Policy WG4	Objection	<p>Housing areas are not required. The housing target of 65 will be met before 2031. Housing areas are not in line or in the spirit of all the community needs in the plan</p> <p>By proposing housing allocations, the NDP is stronger than would otherwise be the case because Herefordshire Council does not have a 5-year housing land supply, but it does have one for 3-years.</p>	No change proposed as a consequence of this representation
	Policy WG16	Objection	<p>Heritage and preservation of it is important to me. No more dwellings should be built by any Listed Buildings. The housing area by Old Court should be removed from the plan.</p> <p>Development next to Listed Buildings is not restricted unless it adversely affects that building or its setting. For the other matter see Appendix 1.</p>	See Appendix 1
C.4	Paragraph 3.2	Questions	We have an issue meeting and achieving the required number of 65 by 2031.The areas that need to be addressed are;	

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
J and V Smith-Milne			<p>1) What is the “Plan” when we reach 65</p> <p>2) What housing is essential for the remainder we have left (12). We have a lack of affordable, starter and 2/3 bedroom homes. The policy WG6 addresses the allocation of the homes – it does not address the building of more.</p> <p>3) The majority (more than 50% of residents) do not want more than 65 new dwellings. There is nothing within the “Policies” which addresses this. There should be a Policy to address this.</p> <p>In my opinion 3.2 Housing is less of a priority than the other 4 issues.</p> <p>The Plan covers the period 2011 to 2031. The policies within the draft plan are estimated to provide slightly in excess of this although it depends upon landowners releasing sites that would meet the criteria, which are fairly common in relation to settlements within the Wye Valley AONB. When the housing site now proposed (if accepted) is implemented, there will be a reliance on windfall development within the settlement boundaries until the Plan is reviewed and revised. There is expected to be a process for this as it is understood Herefordshire Council will be required to review its Core Strategy every 5 years. The site off Llangrove Road would exceed the threshold thereby requiring an element of affordable housing should it be combined with the area that already has planning permission. However, this is not certain. It is recognised that greater emphasis should be given to meeting local housing need and a change is proposed that would help to address this. It is not possible to restrict the number of dwellings to exactly 65 as this would be considered contrary to the requirement to plan ‘positively’. Some flexibility has to be afforded in order for the NDP to meet the ‘Basic Condition’. The approach adopted to provide for slightly greater provision is considered the best way to address the community’s overall aspirations.</p>	See Change No 10
	Paragraph 3.3	Support	<p>As a resident I support the main issues identified. Everything we build or do should support these outcomes</p> <p>Noted with thanks</p>	No change proposed as a consequence of this representation
	Paragraph 3.4	Support	<p>As a resident I support the main issues identified. Everything we build or do should support these outcomes</p> <p>Noted with thanks</p>	No change proposed as a consequence of this representation
	Paragraph 3.5	Support	<p>As a resident I support the main issues identified. Everything we build or do should support these outcomes</p> <p>Noted with thanks</p>	No change proposed as a consequence of this representation
	Paragraph 3.6	Support	<p>As a resident I support the main issues identified. Everything we build or do should support these outcomes</p> <p>Noted with thanks</p>	No change proposed as a

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
				consequence of this representation
	Paragraph 4.1.1	Objection	<p>The new settlement line to the East of A40 and new Housing Area (North of Old Court Hotel) contradicts the vision for the Plan because it conflicts with the objectives described below.</p> <p>Paragraph 4.2.3 - Creating a housing area of 6+3 houses does not protect or enhance the natural or historic environment</p> <p>Paragraph 4.2.4 - Creating a housing area of 6+3 houses does adversely affect Road and traffic due to the large numbers of additional vehicles it has and increases usage on roads.</p> <p>Paragraph 4.2.5 - Creating a housing area of 6+3 houses does not "...foster community spirit" because it does not support existing services or facilities. It does not enhance education or leisure and it does not provide recreational facilities.</p> <p>If residents have "...expressed full support for the vision" why is the housing area in 6.2.4 (Area to the North of Old Court Hotel) proposed in the document. It is clear that that housing area does not support the vision on 3 counts.</p> <p>See Appendix 1.</p>	See Appendix 1
	Paragraph 6.14		<p>During the consultation it appears than 40% or less residents support "housing areas" of any kind (5-10 or 1-4). If the majority DO NOT support housing areas – why does the plan propose and encourage 2 new housing areas? This makes a mockery of the consultation, which it suggests and proposes what the majority of residents don't want!</p> <p>The NDP has to show that it has planned positively and with a high degree of certainty that the required level of proportional growth will be met. In addition, the NDP is stronger if it includes site allocations because without these, should Herefordshire Council not have a 5-year housing land supply then the Core Strategy and any NDP gives way to the Government's policies set out in the NPPF. For NDPs with housing allocations, Herefordshire Council must have less than a 3-year housing land supply for the NPPF to take precedence. Herefordshire Council regularly does not have a 5-year land supply and this situation may continue until it is able to provide by-passes for Hereford and/or Leominster. However, it does have a 3-year supply. At such times as the NPPF is the prevailing planning policy, then housing development only has to amount to 'sustainable development', which is very broadly defined, and there would be no 'in principle' limit to housing numbers.</p>	No change proposed as a consequence of this representation
	Policy WG3	Objection	<p>There should not be an automatic inclusion of development sites within the "new" boundary unless the adhere to the vision and policies. The Plan should ask anyone seeking permission to prove that their developments meet all the policies laid down in the plan. All onus and responsibility should be at the door of the person seeking permission as opposed to the community to point it out.</p> <p>Extending the settlement area to include the area 6.2.4 (North of Old Court Hotel) within the boundary is not sensitive infilling. It is to create a housing area which does not meet the vision or adhere to the policies. It should be removed.</p>	No change proposed as a consequence of this representation

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			<p>The line in Map 2 should be straight across from the 3 new dwellings opposite the school to the gate by the road opposite Martins Grove Industrial Estate. The sensitive infilling – has already been given planning permission (derelict barn behind Old Court Hotel Apartments). Planning was given 10+ years ago but work has never started.</p> <p>If housing area 6.2.4 is given the rubber stamp within this document would the land owners seek a change the permission and ask for 9 new dwellings instead? Or would they apply for even more than 9? With the dwellings opposite the school the planning permission that was originally granted was for 1 semi and 1 detached. Amendments were then granted for 3 detached dwellings – for financial gain only. The amendments to this planning was not given to “foster community spirit” it was for financial gain only.</p> <p>The policies within the NDP should be read as a whole and each considered in relation to proposals according to the particular circumstances. The process has to recognise that there are rarely perfect sites and the process is one of balancing all the issues relating to a particular site. Those making planning applications will need to consider what evidence they should submit taking into account the NDP and other relevant planning policies. The site referred to is not an infill site but an allocation although this has been reviewed in the light of representations received (see Appendix 1). The number of dwellings indicated is for the purposes of showing the likely contribution towards the required level of proportional housing growth. Proposals varying from this would have to show that the policy requirements set out within the NDP can be met without causing any significant adverse effects.</p>	
	Policy WG4		<p>There is no need to include SITE ALLOCATION 1 as at the time of responding (27.4.18) I see on the Herefordshire Planning website that applications are already in for: P174346/O Brookside – 5 dwellings – this fits in with policy WG1, WG2, WG 14, WG15, WG16, WG17. P174508/O Old Pond Cottage – 10 dwellings – this also fits within policies stated above.</p> <p>With a common sense approach it seems likely that 65 dwellings will be met without proposing or encouraging other new housing sites. Whilst at the starting point of the plan, it may have appeared that a “call for sites” was necessary. It is now evident that these sites proposed are no longer required. They should be shelved as “ideas” until 2031. If dwellings which have been granted planning have not built or converted by 2031 then these sites could be called upon again, after 2031 and if they adhere to all policies of the current plan and any future plan from 2031 onwards.</p> <p>It remains to be seen whether the two sites for which there are planning applications will be granted planning permission. To continue to wait would put the parish at risk of further applications to be determined under the provisions of the NPPF. To produce a NDP without a housing allocation would have a similar effect as explained above.</p>	No change proposed as a consequence of this representation
	Policy WG9	support	<p>Land adjacent to the River Wye to the east of Whitchurch. As a resident I whole heartedly support regeneration and improvements to the area by the River Wye. It is important to attract tourists and locals to visit our villages. The footpaths and cycle accessibility is an issue in the summer as paths become over grown and there seems to be no accountability in keeping them clear and attractive. This should be given a high priority. The PCC could offer to part fund investment with levies gained from dwellings being built.</p> <p>Noted with thanks</p>	No change proposed as a consequence of this representation

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
	Policy WG14	Support for policy. Objection to Policy WG4	<p>Whatever is built in 6.2.4 (North of Old Court Hotel) it would contradict this policy. For local residents and tourists and visitors it is essential that this policy is upheld. Building new dwellings in an area which is considered by most to be beautiful (the garden and outlook of the Old Court) would create a “detrimental effect on the landscape”. The policy states that “Planning permission will be refused....unless there is proven public interest or no viable alternative sites are available”. There is already viable sites in the process of planning permissions and there is no “proven public interest”. This housing area should be removed from the settlement boundary and the plan completely. Map 2 should be amended to exclude this area.</p> <p>Support for Policy WG14 noted. For other matters see Appendix 1.</p>	See Appendix 1
	Policy WG16(c)	Support for policy. Objection to Policy WG4	<p>Additionally, the NPPF states the importance of the “...sustainable management of the historical environment” is paramount. The NPPF Principle 2 states that everyone “should participate in sustaining the historic environment”. It is the responsibility of the parish and people within in it to sustain our historic environment. A development such as the one North of Old Court does not meet this principle.</p> <p>It is essential that this policy is adhered to strictly by anyone looking to develop around the heritage of the area. I strongly resist the allocation of a housing area to the North of The Old Court Hotel as it contradicts the policy and point c & f of the policy. The inclusion of the housing area to the North of The Old Court Hotel would also contradict Historic England’s 2008 Guidance on Conservation Principles and its National Planning Policy Framework (NPPF). The Old Court Hotel building was built in 1570 and has strong significance in all important areas laid down in the Conservation Principles 2008;</p> <ul style="list-style-type: none"> • Historical Significance & Value • Evidential Value • Aesthetic Value • Communal Value <p>Principle 3 states that “understanding the historic significance is vital”. The Old Court Hotel provides vital evidence in looking at how buildings were built and lived in from the Elizabethan era. The current owners have spent significant funds preserving it for the future (for e.g. re-roofing the old building (approx. £250,000) in line with Historic England and Conservation Officer guidelines. The historic significance would be affected if the was to be a new housing area adjacent to the historic building. Especially, where there is no significant need in the area to build those houses unless sites cannot be found prior to 2031. The housing area should be given the lowest priority if numbers are not met. It is currently given the highest priority within the plan section 4.</p> <p>Principle 5 of the NPPF states that when making decision about changing the setting of a listed building that the reasons should be “reasonable, transparent and consistent”. Given that the housing need in Whitchurch is not a crisis (65 houses to be built between 2011 & 2031, at 2018 53 already granted) then there is no reasonable grounds to create a housing development adjacent to the Old Court Hotel. Any decision to grant planning would not be consistent with the neighbourhood plan objectives. Finally, most importantly, that decisions regarding changes must be transparent. Any</p>	See Appendix 1

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			<p>housing area that is granted planning adjacent to a listed building should be “essential”. The housing area identified is not essential and therefore the transparency surrounding any inclusion of it in the plan must be made clear. Is this area included to provide essential affordable homes for the parish, is it to provide essential affordable bungalows for the elderly, is to provide essential starter homes (with financial aid) or is it for another reason that the landowner can provide? There is only a need to provide 12 more houses between 2018 and 2031.</p> <p>There is no “reasonable” reason to include this housing area due to the detrimental impact it would have on a historic setting.</p> <p>Support for Policy WG16(c) noted. For other matters see Appendix 1.</p>	
	Policy WG20	Support for policy. Objection to Policy WG4	<p>I support the plans efforts to prioritise the traffic measures/safety within the plan. I support the desire to develop positive measures 1-6 within the village. In order to introduce the measures there needs to be a funding resolution. I cannot see within the document how this would be addressed. The “next steps” needs to be included or alluded to within the plan in order to make it happen. If the plan cannot address the financial resolutions, it can resist “housing areas” which would / could result in the largest overall increase in traffic/vehicles in the parish. In suggesting and proposing housing areas, particularly the housing area close to the school. The plan contradicts the policy.</p> <p>The area by the roundabout and school is already identified as one of the highest risk areas in the village. By creating one of the largest housing areas in the village before the school and roundabout – there will be a significant increase in traffic unnecessarily. Adding relatively large (for this parish) housing areas near high risk areas should be avoided in all cases until traffic measures 1-6 have already been put into action. On this basis the Housing area 6.2.4 should be removed from the plan and settlement area Map 2.</p> <p>Support for Policy WG20 noted. For other matters see Appendix 1.</p>	See Appendix 1
	General comment	Objection	<p>Whilst I appreciate that this process started a few years ago it, the call for sites has become insignificant in terms of need. The requirement for 12 more dwellings between 2018 and 2031 (13 years) is small and it is likely that this will come about through natural application. I.e. More than 1 new dwelling per year has been granted outside the envelope over the last 10 years. There is not a “crisis” of housing within Whitchurch. There are no homeless street sleepers in Whitchurch. The requirement for housing is to meet the County/Country wide needs – not local needs. The profile of people buying dwellings (not including affordable) is not “local”. It appears to me that the strength and amount of weight put behind the housing areas outweighs the need for increased services and enhancement of facilities within the plan. Neither housing area proposes homes that are affordable. None of the information provided states landowners want to provide extra facilities or safer road networks/provision or pathways/cycle routes. It would be sensible to put “Housing Areas” as a reserve in the unlikely event that the 65 houses are not met by 2031. In 2031 if we need to fulfill the 65 houses – then these areas can be utilised then.</p> <p>As a resident I do not support any new dwellings over the 65 limit set by Herefordshire Council. It is essential dwellings over this amount are resisted with the strongest will during the timeframe 2011-2031.</p> <p>If the committee think that housing should be allowed over 65 it should only allow it on the following basis;</p>	No change proposed as a consequence of this representation

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			<p>1) A single dwelling</p> <p>2) Meets all policies within Plan (the onus on the developer proving it has met the requirements of the plan WG1-WG24 where applicable)</p> <p>3) That a significant financial contribution is made to the Community for community working groups. (By significant I mean £15,000 to £50,000 per dwelling based on bedrooms)</p> <p>4) That the dwelling adds to the community in policy areas WG20/WG21/WG22/WG23</p> <p>The draft document does not cover or deal with the strategy after 65 houses are built (and the target is near). There should be a provision within the plan to deal with this issue. Not only because it important but because it is of significant public interest locally. There is little support for more than 65 houses.</p> <p>As a resident I would urge the NBHP committee to adopt sensible feedback in relation to the plan. If feedback is not adopted within the plan, then residents could question its legitimacy, transparency and legality.</p> <p>The NDP has to show that it has planned positively and with a high degree of certainty that the required level of proportional growth will be met. In addition, the NDP is stronger if it includes site allocations because without these, should Herefordshire Council not have a 5-year housing land supply then the Core Strategy and any NDP gives way to the Government’s policies set out in the NPPF. For NDPs with housing allocations, Herefordshire Council must have less than a 3-year housing land supply for the NPPF to take precedence. Herefordshire Council regularly does not have a 5-year land supply and this situation may continue until it is able to provide by-passes for Hereford and/or Leominster. However, it does have a 3-year supply. At such times as the NPPF is the prevailing planning policy, then housing development only has to amount to ‘sustainable development’, which is very broadly defined, and there would be no ‘in principle’ limit to housing numbers. The planning process is one of balancing competing objectives and showing that where their adverse effects these are significant compared to the benefits, and in relation to housing, the need to plan positively for this is set by Government. Provisions in relation to the contributions that can be received from developers towards local facilities and infrastructure are also set by Government. The parish council awaits the introduction of the Community Infrastructure levy by Herefordshire Council which would provide it with income towards facilities and local services.</p>	
	Policy WG4(i)		<p>The Housing area suggested 6.2.4 (North of the Old Court Hotel) contradicts the VISION of the whole “Plan” which states that any housing should”encourage and support businesses”. The housing area of 9 houses (3 existing permission + 6 adjacent) could and would affect the smooth trading of The Old Court Hotel. This is on the basis that it affects the:</p> <p>a) ambience and natural, open AONB feel of the outside area;</p> <p>b) noise from the garden and hotel could cause operational restrictions and therefore business deterioration;</p> <p>c) long standing building works would affect bookings and guest satisfaction leading to loss of business.</p> <p>The business success should take precedence over a “call for sites” when there are alternative areas which could fulfil the parish needs. It should be removed from the draft plan due to the contradiction with the whole ethos of the future of the village.</p>	See Appendix 1

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			<p>This linked in with the specific vision that by 2031 the plan will:</p> <p>4.2.2. "...support employment" in the village. If trade is affected at The Old Court Hotel (OCH) then the number of employees will reduce. OCH is one of the biggest employers in the parish. OCH actively keeps the young 16-18 in education (currently 3 children in full time education with us). OCH introduces many parish children to "work" from the age of 14 upwards. It also employs people within the parish and neighbouring parishes. Therefore housing in that designated area would not "support employment".</p> <p>4.2.3 ".....to protect the historic environment" Building within the eyesight and setting of a 2* listed historic building immediately contradicts the vision to "protect heritage". Therefore it does not protect heritage.</p> <p>4.2.5 "Enhance...facilities" and foster a "...community spirit". By building a new housing area of 9 houses adjacent to OCH this is not done in the essence of creating "community spirit". It is not to build affordable homes, it is not to build bungalows, it is to build dwellings for profit. It does not enhance local facilities in any way – its only purpose is to build dwellings.</p> <p>Therefore it does not meet the vision and contradicts the purpose of the plan. It should be removed from the draft plan.</p> <p>The housing area proposed (6.2.4 North of OCH) contradicts policy WG1 Promoting sustainable development in the following areas:</p> <ol style="list-style-type: none"> 1) A - It does not "...contribute to the needs of the local or wider community". It contributes nothing to the community or people living in the parish. 2) B - Economic development. Proposals should "diversify the local economy". A housing development of 9 houses does not "diversify the economy". Take the most recent example – 3 houses opposite Whitchurch School – Houses sold for in excess of £1m raising funds for the landowner and the developer only. 3) E - Highway safety. An additional 9 dwellings will have a "detrimental effect" traffic will permanently increase affecting the environment and creating additional congestion in an area of the village that is already a HIGH RISK zone next to the school. 4) <p>The housing area proposed (6.2.4 North of OCH) contradicts policy WG2 Development Strategy in the following areas;</p> <ol style="list-style-type: none"> 1) a - "...appropriate infilling may take place". The settlement area has been adjusted where the line is unnaturally taken away from its natural position (see Map 2 Brown area North OCH) to create infilling. Planning has already been granted for the derelict barn to create 3 dwellings which is the "appropriate infilling" – in adding a further 6 dwellings – it is not "infilling" dwellings, its increasing the area for opportunist financial gain. Therefore the settlement area should be changed to only include the existing planning permission. 2) b - Infilling should be "very small scale" and "designed to fit sensitively into the landscape". The current planning permission for 3 dwellings within the derelict barn meets this policy. 6 more dwellings does not meet this policy and again contradicts it. Therefore the settlement area should be changed to only include the existing planning permission. 	

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			<p>3) d – OCH supports the increased use of land adjacent to the River Wye – where it is sympathetic to the local environment. We think it should be actively encouraged alongside increased paths cycle & walking.</p> <p>There is no need to include SITE ALLOCATION 1 as at the time of responding (30.4.18) I see on the Herefordshire Planning website that applications are already in for: P174346/O Brookside – 5 dwellings – this fits in with policy WG1, WG2, WG 14, WG15, WG16, WG17. P174508/O Old Pond Cottage – 10 dwellings – this also fits within policies stated above.</p> <p>Therefore, there is a factual argument to remove Allocation 1 from the draft document. Allocation 1 significantly contradicts and counteracts what is stated in the plan in so many areas it should be immediately removed. Allocation 2 does not impact OCH business so I do not have a response to that.</p> <p>The aim of the housing policy within Whitchurch is to “...bring forward enough land to achieve the minimum target within or adjacent to Whitchurch between 2011 and 2031”. The minimum target is only 12 houses short with 13 years to spare and better suited planning applications already in progress, so why is Housing area allocation1 included? Allocation 2 provides a buffer, if required, which does not contradict the policy in such a great and weighty manner as Allocation 1. The housing area proposed (6.2.4 North of OCH) contradicts policy WG3 Housing Development in Whitchurch in the following way;</p> <p>The housing area proposed is within the NEW settlement boundary to the east of the A40. The policy states that new housing “...will primarily be restricted to sensitive infilling”. The additional 6 dwellings 6.2.4 North of OCH is not a “sensitive infilling” in fact, the “sensitive infilling” was granted over 10 years ago within the derelict barn and so far has not been converted.</p> <p>The Housing Area North of OCH should be removed from the draft plan as it does not meet the policy needs or requirements.</p> <p>The housing area proposed (6.2.4 North of OCH) contradicts policy WG4 Housing Sites in Whitchurch in the following way;</p> <p>The overall allocation states that housing sites should be allocated “...where they comply with policies set out in this plan”. This response proves beyond doubt that the allocation of housing site North of OCH actually does not comply with 12 of policies within this plan. It should be removed.</p> <p>6.2.4 states that an extension of the current public right of way may “benefit walkers and [the] hotel.” There is no public benefit to walkers as the public right of way path is already easily identified and used to the road by the school. Changing the path would make it less direct and longer and therefore ridiculous. There is no sensible reason to change the footpath other than to provide access for new dwellings. In addition, there is NO benefit to the OCH as stated in the draft plan, page 32 6.2.4. The statement that a path would “benefit” the hotel is</p> <p>1. Untrue</p>	

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			<p>2. Without evidence 3. Misleading to the general public of the parish</p> <p>The statement in 6.2.4 appears more positive compared to the statement in 6.2.5 which is significantly more negative. Has the committee not taken into account that the Landowner on 6.2.4, with in the last 15 years, has built a new large single dwelling (next to school), had granted planning permission of 3 dwellings within the derelict barn (not built yet), had granted planning permission for 3 dwellings opposite the school and is now proposing 6 new dwellings behind the barn. The 6 new dwellings would also take combined new dwellings for the landowner over 10 to 13 (similar to the number in 6.2.5) but this has not been mentioned. Even though it is not exactly the same site – it is adjacent (albeit a few metres) to the area of 3 dwellings built opposite the school.</p> <p>It is clear from 6.2.4 & 6.2.5 that if this is to remain in the proposal a more transparent, equal and community minded proposal should be put forward. This proposal should also include areas that have applied for planning permission as for mentioned (Brookside/Old Pond Cottage). This policy is misleading to the parish public as it makes it appear that there are no other areas available to be able to meet the required “Call for sites”.</p> <p>It is clear just from Policy WG4 that the Housing Area 1 proposed in 6.2.4 should be removed from the Draft Plan before it is taken further.</p> <p>The housing area proposed (6.2.4 North of OCH) contradicts policy WG7 Housing Design & Appearance in the following way;</p> <p>d) This policy states that new developments should not “...adversely affect....adjacent properties views or vistas”. If housing area 6.2.4 North of OCH is included it would significantly affect the view & vista for hotel guests, tourists and local people who enjoy our outdoor facility.</p> <p>This settlement area should be amended to remove the area 6.2.4 North of OCH</p> <p>The housing area proposed (6.2.4 North of OCH) contradicts policy WG14 Conserving Landscape & Scenic beauty in the following way;</p> <p>1) A – Considerations should be taken into account for “detrimental effect on landscape character & features”. Any building within the sight and setting of the 2* listed building would be detrimental if it creates a new “feature” or new “character”. New dwellings would create both new feature and character and this housing area 6.2.4 should be removed from the plan.</p> <p>2) E – Any building in 6.2.4 would significantly affect “cultural heritage” and “tourism” and “recreation”. The garden of the OCH is a meeting place for tourists, locals, weddings guests. Their enjoyment and perception of</p>	

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			<p>the setting would be that of “housing” not the AONB it is currently, therefore building there contradicts the policy.</p> <p>This policy states that any proposals should “enhance” and “conserve” the locality. The current planning within derelict barn meets this proposal but building an additional 6 new dwellings does not. The additional dwellings should be removed from the proposal and settlement plan.</p> <p>The housing area proposed (6.2.4 North of OCH) contradicts policy WG15 Enhancement of Natural Environment because building new dwellings does not “...enhance the ecological network”. The policy looks for opportunities to 1) Retain, 2) Create 3) Enhance natural habitats. Building there does not comply with this policy. In fact the habitation of bats within that area is large and they would need significant rehoming just to convert the derelict barn, which already has planning permission.</p> <p>Housing area 6.2.4 should be removed on the basis that it does not support the policy WG15.</p> <p>The housing area proposed (6.2.4 North of OCH) contradicts policy WG16 Protecting heritage assets, in the following way;</p> <ol style="list-style-type: none"> 1) C- Proposes that the parish should “...resist development that adversely affects....the setting of Listed Buildings”. Proposing and building a housing area next to a 2* Listed Building contradicts that policy. I have sort advice from a senior employee at Historic England, who has confirmed to me that no planning would be supported by Historic England if it “affected the setting of a 2* listed building”. 2) F- promote development of farmsteads – not an actual farmstead but the derelict barn (with existing planning) meets the needs and adding 6 new dwellings does not promote the “features” of the character of the barn. <p>On the basis that the housing area 6.2.4 is directly adjacent to a 2* Listed Building it should be removed from the proposal as it contradicts the policy and would not be supported by Historic England or possibly the Conservation Officer.</p> <p>The housing area proposed (6.2.4 North of OCH) contradicts policy WG20 Traffic measures within Parish, in the following way;</p> <p>Points 1/3/4/5/6 will all be adversely affected by building a housing development at 6.2.4 North of OCH. The access onto a small road is poor – it is single track during term time due to parked cars, it is very near the school (high risk already).</p> <p>A housing development in this location contradicts the policy WG20 and therefore should be removed from the draft plan.</p> <p>The housing area proposed (6.2.4 North of OCH) contradicts policy WG22 Protection and Enhancement of Facilities in the following way;</p>	

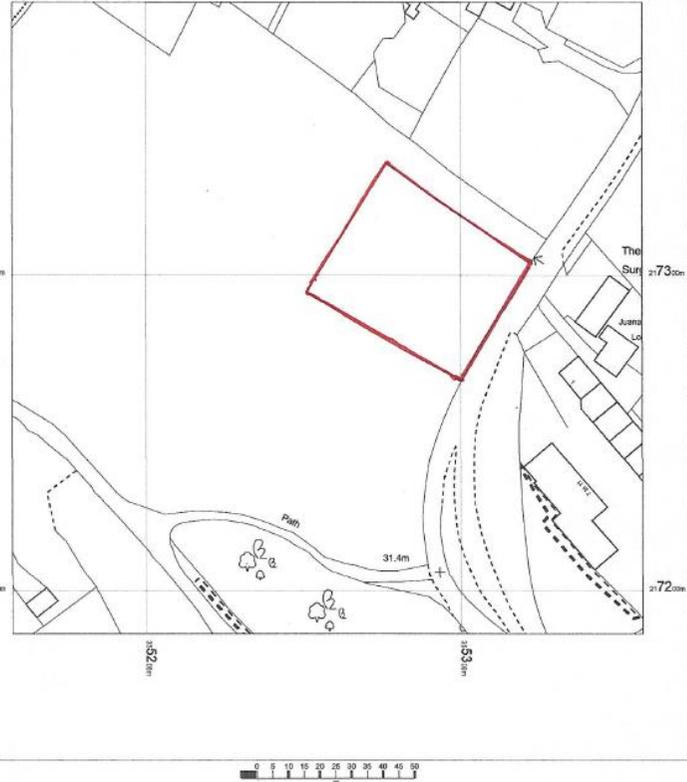
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			<p>The plan states that existing parish facilities should be ...”protected from development that might restrict unnecessarily their current use unless alternative provision is made.” Within the plan there is no mention of Whitchurch School which currently runs at capacity and has to house a class of children within a make shift temporary building.</p> <p>It is sensible to predict that with 65 new houses there will be some toddlers and primary school aged children. There is nothing within the plan to extend the school facilities to take extra children or to enhance the facility of the school for the existing numbers.</p> <p>Therefore building houses recommended in 6.2.4 North of the OCH contradicts this policy.</p> <p>See Appendix 1</p>	
	Policy WG6	Suggests change	<p>As a large local business, we believe affordable homes are required within the parish. I see no detailed proposals or ideas within the draft plan to dictate or suggest to landowners this requirement. There should be details and ideas laid down to ensure that the building of larger dwellings is curbed and building of required dwellings increased within the required 65.</p> <p>The site off Llangrove Road would exceed the threshold for affordable housing should it be combined with the area that already has planning permission. However, this is uncertain. It is recognised that greater emphasis should be given to meeting local housing need and a change is proposed that would help to address this.</p>	See change No 10
	Policy WG9	Support	<p>The OCH supports the regeneration of land adjacent to the River Wye. The OCH believes the village should encourage and support the landowner to invest in the area.</p> <p>Noted with thanks.</p>	No change proposed as a consequence of this representation
	General Comment	Comments	<p>This response is from the perspective of the Old Court Hotel as a local business in the area. The business is a significant size, one of the largest employers and a substantial taxpayer locally and nationally. The business is also a community minded organization. For years we have hosted community events free of charge or at nonprofit costs including; St Dubricius Church; Whitchurch Flower Club; Wye Valley Arts; Cottage Garden club; parental school free parking, Whitchurch School PTFA events and holding a yearly free Garden Party raising funds for national charities. In addition, the Neighborhood Plan Steering Group have been hosted free of charge for the years they have been producing this document! It is essential that the response is taken seriously and given the weight it deserves given the community focus of the business and the contribution it has made (for 12 years) and continues to make for the people of this parish and parish itself.</p> <p>A few overall comments;</p> <ol style="list-style-type: none"> 1) Within the document there seems to be a disproportionate lack of evidence or proposals as to how the parish can increase affordable housing and bungalow housing. It is disappointing that the Housing Sites identified (WG4) belong to landowners who have already benefited from planning permissions given. In the spirit of 	See Appendix 1

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			<p>“community” should opportunity to financially gain from the “Call for Sites” not be spread across the parish landowners and not put in hands of people who’ve already gained?</p> <p>2) Once the 65 dwelling requirement has been met. There is a lack of support to continue building in the Parish (57% of residents do not want more than 65 new dwellings). This is not addressed in the document.</p> <p>3) In addition to point 2, there is no support locally for new “housing areas”.</p> <p>4) Any housing over 65 should be prioritized according to requirements of affordable need. Planning permission should not be granted for anything that does not add to the community of the village. Landowners should make contributions to the parish if they would like to build any housing which is not affordable, starter or bungalow. For example; 3 houses opposite school have sold for over £1m. A contribution of £15,000 for the 3 bed and £25,000 for both 4 beds could have given the Parish Council £65,000 to spend on a community facility without having to apply for any charity funds or Herefordshire Council. These funds could be spent fulfilling the ideas of “community” within the plan laid out WG22/WG23.</p> <p>A policy should be proposed that any dwelling over 65 earmarked should contribute to the Parish by way of a donation/tax/levy. This could be scaled up and down according to size. The future is not handouts from councils – the future is communities creating opportunities for themselves. “. There is a lack of ideas about how to create facilities within the village. For e.g. anyone building within 500m of the school should be required to provide some free off road parking for school teachers, parents to protect and reduce risk for children travelling to school. There is a huge lack of free/legal parking for parents and staff. Any development should include this. An opportunity was missed when planning was granted on 3 houses opposite school – that would have been an ideal place to create community parking. The French are brilliant at creating community parking in villages that works very effectively.</p> <p>See Appendix 1.</p>	
C.6 L and D Lerego	Policies WG4 and WG5		<p>Do not support any new housing areas. Single houses should be sought to gain up to 65 houses. We do not support housing by the Old Court Hotel. We use the local hotel and it would affect our enjoyment of the pub.</p> <p>See Appendix 1</p>	See Appendix 1
	Section 6.4		<p>No more new houses should be built over the 65 limit. We moved here to be in the AONBV and not drive around and see new houses everywhere which are not needed.</p> <p>It is not possible to restrict the number of dwellings to exactly 65 as this would be considered contrary to the requirement to plan ‘positively’. Some flexibility has to be afforded in order for the NDP to meet the ‘Basic Condition’. To prepare a NDP that does not meet the ‘Basic Condition’ would not be possible and not to prepare a plan would result in either developer led developments or Herefordshire Council allocating sites through its Rural Areas Sites Allocation Development Plan Document. The approach adopted to provide for slightly greater provision is considered the best way to address the community’s aspirations.</p>	No change proposed as a consequence of this representation
		Support policy WG16. Object to policy WG4	The heritage and areas around the heritage should be protected. No building should happen around or near Listed Buildings. Your housing area by the Old Court Hotel contradicts this policy	See Appendix 1

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	Policy WG16 (Effectively WG4)		Support for Policy WG16 noted with thanks. For the other matter see Appendix 1.	
	Policy WG20		Traffic is dangerous in the village. We need slower speed and speed management. It is often dangerous on horseback. New housing areas would only add to the number of cars and speeding. No housing areas should be allowed. There is no evidence that the level of housing required or proposed would have an adverse effect on the highway network and capacity within the parish.	No change proposed as a consequence of this representation
C.7 G Ruck, Chair of Governors Whitchurch Primary School			There is very little/no parking for staff and pupils. This should be considered and included. Access onto the school crossing will make this single unmarked point more unsafe. Should the School seek to provide parking facilities for the school, this would be policy WG22. A proposal can only be included in the NDP if the School or Education authority requests a site to be found and indicates the resources are available to provide this.	No change proposed as a consequence of this representation
			We support the development of mixed housing, including small and social housing in the village. Noted with thanks	No change proposed as a consequence of this representation
	Section 6 Housing Policy		Housing should be developed for first time buyers like me in locations such as the Crown Inn and The Highway Star for prices less than £100,000. Housing areas such as 6.2.4 and 6.2.5 do not build any houses that I can live in or afford to buy. The NDP cannot control house prices but policy WG6 seeks to influence the allocation of affordable housing to local people and this would include low-cost home for sale. The site off Llangrove Road would exceed the threshold should it be combined with the area that already has planning permission. However, this is uncertain. It is recognised that greater emphasis should be given to meeting local housing need and a change is proposed that would help to address this.	See change No 10
C.8 N Carrigher	Policy		Building housing area by The Old Court Hotel contradicts policy WG16 to protect the heritage. As a regular customer, housing development near a 2* Listed Building should be resisted not proposed. It does not support the key issue of 'supporting enterprise' (para 3.3). It therefore contradicts that policy See Appendix 1	See Appendix 1
	General comment		My family moved here to be away from housing estates and areas. I strongly resist housing areas which are not affordable. They should only be affordable, so I can buy one. The NDP must ensure there are sufficient sites available to meet at least the minimum level of required proportional housing growth. Most of this housing will be through permissions granted small sites. Only that off Llangrove Road would be in the form of an estate development although a change suggested to afford flexibility to provide affordable housing should a need be established.	No change proposed as a consequence of this representation
C.9	Housing Strategy	Objection	My clients raise no objection to Option 3 of the overall draft development strategy (see paragraph 5.1.1). However, they <u>object</u> strongly to draft Policy WG1(a) which supports the delivery of only 65 houses up to 2031 taking into account	See change No 8

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Mr and Mrs Gee c/o Paul Smith Planning	(policy WG1(a), paragraphs 3.2.1 and 6.4)		<p>the current commitments. This figure would meet only the minimum number of houses in the pursuit of the proportional growth of the village. Whilst such a heavily restrained housing strategy might be justified for a small settlement with no or few community facilities, it is not justified for Whitchurch. Herefordshire Council has recorded in 2003 Whitchurch as being one of the most sustainable of all the rural settlements. It includes a shop, café, public houses/hotel, petrol filling station, an employment area, a primary school, church and village hall and has easy access by public transport to the higher order settlements of Ross-on-Wye and Monmouth.</p> <p>It is contradictory for the NDP to recognise the good sustainability credentials of this village (see paragraph 3.6.1 of draft NDP) yet at the same time advocate a very restrictive approach to meet only the minimum number of houses to meet a 14% growth in the number of houses in village. If the supply of houses in the Ross-on-Wye Housing Market Area is to be significantly boosted in excess of 14% - an objective of the development plan and national planning policy – the most sustainable of rural settlements such as Whitchurch must grow by more than 14% unless, illogically, the required added growth is found in smaller less sustainable settlements. Core Policy RA2 identifies Whitchurch as one of the foci for rural housing development and this restrictive approach of the NDP does not accord with the development plan. Policy RA2 distinguishes the larger settlements such as Whitchurch from the smallest of rural settlements. No village specific-circumstances of constraints have been cited in the NDP to justify the village growing by only the minimum amount cited in Core Strategy Policies RA1 and RA2.</p> <p>My clients consider that more housing should be permitted at Whitchurch given these factors. Taking into account the draft strategy of the NDP, a means of increasing the number of houses at Whitchurch appropriate to its sustainability credentials would be to increase the number of housing allocations in the NDP and the enlarge the settlement boundary accordingly.</p> <p>In conclusion there is objection to the policy and strategy. The number of new housing permissible at Whitchurch under the draft NDP should be increased from the 65 proposed under Policy WG1 of the NDP to between 70 and 80 dwellings.</p> <p>The NDP advocates a very restrictive housing strategy for Whitchurch despite it being the one of the most sustainable settlements in the local Housing Market Area contrary to rural housing strategy of the development plan and national planning policy.</p> <p>The reference to 65 is not stated as a maximum but the required figure indicated by Herefordshire Council. However, a change to refer to this being the minimum is proposed. There is an obligation on the Parish to plan positively but none to provide significantly in excess of the required level of proportional growth. In this respect the location of both its settlements within the Wye Valley AONB is a major constraint that is cited within the NDP and paragraph 116 of the NPPF requires proposals for major development to be refused except in exceptional circumstances, and none of these have been identified. The NDP provides for at least 65 houses and this does not take into account any windfall development within the settlement boundaries of both its settlements.</p>	

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	Policies WG2 and WG3	Support	<p>My clients <u>generally support</u> the proposed housing strategy pursued largely through the application of settlement boundaries under Policies WG2 and WG3.</p> <p>Noted</p>	No change proposed as a consequence of this representation
	Policy WG4	Object to Policy WG4; support WG4(i); seek addition of a further housing site	<p>My clients also <u>support</u> the proposed allocation of their brownfield and developed site for housing purposes under Policy WG4 (i). It should be noted, however, that this proposed allocation refers to land “north of Old Court Hotel” whereas the land in question identified on the Village Proposals Map as lying to the west of the hotel.</p> <p>However, my clients <u>object</u> to the omission of another parcel of their land to the south-east of the hotel as a housing site in Policy WG4 (see attached site location plan of site). This site is level, not elevated, it is not prone to flooding, adjoins the main village built-up area and a large modern dwelling. Its visual envelope is limited, and it has the scope to include a good vehicular access. The site would lie in the eastern segment of the village where commercial premises and community facilities exist including the primary school. There is insufficient inter-visibility between this site and the Principal Building at the Old Court Hotel to avoid its development harming the setting of this listed building. Given that the NDP should increase the number of new houses permissible at Whitchurch appropriate to its sustainability credentials (above for justification) the allocation of part or all of my client’s land identified on the attached plan for three or four houses would increase this supply of village housing in an appropriate and acceptable way.</p>	See changes 10 and 13

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			 <p data-bbox="801 1114 1989 1342">This suggested additional allocation would result in a modest-sized development in accordance with the objectives of paragraph 6.1.4 of the draft NDP, Option 3 under paragraph 5.1.1 and draft Policies WG1, WG2 and WG3, WG14 and WG17. Further, there is some doubt that the two allocated sites in Policy WG4 would result in 6 dwellings. The allocation of my client's land would ensure that the restricted housing strategy advocated in the draft NDP would be achieved even were its very restrictive strategy to be adopted. In conclusion Policy WG4(i) is supported. The proposed allocation of land to the west of Old Court Hotel for housing in accordance with the Proposals Plan is appropriate: it is brownfield land, comprises built development, adjoins the main village built-up area on two sides and would not affect the setting of any listed building or the local landscape.</p>	

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			<p>However, there is objection to the policy as a whole. To meet this greater number of new housing in the most appropriate way (see comments above under Policy WG1), my clients consider that their parcel of land south-east of the old Court Hotel alongside a large modern dwelling should be allocated for the erection of three or four dwellings. Such an allocation would accord with all other aspects of draft NDP, Core Strategy and national planning policy.</p> <p>Support for WG4(i) noted. However, concerns have been expressed about whether the site is deliverable, and a change suggested that would remove the site as an allocation although retain it within the proposed settlement boundary. There is no requirement for any additional housing land allocations to meet the required level of proportional housing growth. Environmental and other concerns might be expected about the suggested additional site although a policy amendment sets out provisions which, should they be capable of being met, would allow sites on the edge of Whitchurch settlement boundary where these are for affordable or self-build housing .</p>	
C.10 Pegasus Group on behalf of S Porter	Housing Strategy, paragraph 3.2.1	Comment	<p>Paragraph 3.2.1 of the consultation document deals with the issue of housing. It explains that housing growth for the Parish is defined by the Herefordshire Local Plan Core Strategy adopted October 2015 (“the Local Plan”), which sets an indicative growth target of 14% across the Ross-on-Wye Housing Market Area (HMA). This is outlined under Policy RA1 of the Local Plan, and is intended to provide a basis for growth targets to assist the production of neighbourhood development plans. It is important to note that the Local Plan does not in itself set a target for the Parish, merely a means of determining an appropriate scale of growth. In respect of Whitchurch and Ganarew Parish, it is understood that the level of growth has been determined by establishing 14% of the total number of households in the Parishes based on 2011 Census data. This showed there to be 396 households in Whitchurch and 64 in Ganarew. Based on this number of households the proportionate growth for the neighbourhood plan area has been identified as 65 dwellings, and this is now the figure set out under Policy WG1 of the draft Neighbourhood Plan.</p> <p>Paragraph 3.2.1 of the consultation document goes on to state that between 2011 and December 2017 53 dwellings have been built, or benefit from planning permission. It states that “12 more dwellings are needed to meet the minimum level of proportion growth” [emphasis added]. Table 1 (on page 35) of the consultation document confirms that this residual amount (i.e. the 12 dwellings) will be delivered on the two proposed housing allocations reference at Policy WG4.</p> <p>In our view merely seeking to allocate land for 12 dwellings will not achieve the Vision and Objectives outlined in the neighbourhood plan, and certainly fails to address the housing needs of the area, especially those identified within the Whitchurch and Ganarew Neighbourhood Plan – Future Housing Needs Survey Report (September 2016) which itself indicates a current and /or future need for 18 dwellings. The evidence supporting the plan therefore clearly demonstrates that there is a short-term housing need in the area.</p> <p>Notably the 2016 Survey also contains details of the specific housing requirements drawn from the housing survey itself (see page 5). This information confirms the tenure of housing required, and clearly demonstrates a particular need for affordable housing. Unfortunately, the draft Neighbourhood Plan is silent on how it intends to address these needs. We note that whilst draft Policy WG6 sets out terms to ensure that local people are prioritised for affordable housing, it can only be applied to future planning applications for schemes that will include affordable housing requirement. The problem is that Local Plan Policy H1 only requires affordable provision on sites of more than 10 dwellings. In which case the two sites allocated for residential development in the draft Neighbourhood Plan will not be obligated to provide any affordable</p>	See change No 10

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			<p>housing. Draft Policy WG6 is therefore likely to become redundant unless a scheme comes forward for 100% affordable housing.</p> <p>Our concern is that Neighbourhood Plan will therefore not meet the affordable needs identified by the Housing Needs Survey, and we believe this issue must be addressed if the Neighbourhood Plan is to achieve its own objectives (particularly Objective 1) and meet the basic conditions, particularly the requirement to contribute to the achievement of sustainable development. We believe that of the 4 Options for Housing Development considered by the Steering Group, Option 4 would be the most appropriate to address the housing issues over the plan period (2011-2031).</p> <p>With regards to the committed supply of housing that the Steering Group are presently relying on to meet the housing target for the Parish, we note that the Whitchurch and Ganarew Neighbourhood Plan Housing Report (January 2018) includes – as part of this supply - the redevelopment of Marsden House (care home) for 12 dwellings (application ref: P143823/F). Marsden House offered 23 places for people over the age of 65 requiring residential care. We are not aware of any replacement care provision being made available within Whitchurch or Ganarew. Given the ageing population profile of the two Parishes, there is likely to be increasing demand for suitable housing to meet the need of older people, who understandably will wish to remain in the area. And notably the Housing Needs Survey (September 2016) highlighted a current need for housing adapted for older persons or persons with special needs. Over the lifespan of the plan it is likely there will be an increasing need/demand for this type of accommodation. This is an issue that must be addressed.</p> <p>It is our view that the evidence supports the allocation of additional land to meet the housing needs of the area, and we strongly believe that land adjacent to Delburne Farmhouse (shown on the enclosed plan) can play a part in contributing to the range of housing available – including housing for older people - and should be identified for allocation.</p> <p>In terms of the policies contained within the current draft Neighbourhood Plan more generally, we would like to take this opportunity to make the following comments:</p> <p>Policy WG 1 sets the target for housing growth over the NDP period. The provision of housing to meet local needs will not just be achieved through the provision of dwellings upon an allocated site but through planning permissions already granted which includes small and family housing. The Parish Council is aware of the provisions of NPPF paragraph 116 which places significant restrictions on major development within the AONB, and this in turn affects the ability to deliver affordable housing. The NDP does however, propose land that in combination with a site already having planning permission should exceed the 11-dwelling threshold. However, it is recognised that greater emphasis should be given to meeting local housing need and a change is proposed that would help to address this. There is no evidence that an allocation of additional sites will result in specialist and other housing specifically for elderly people already living within the Group Parish.</p> <p>Whitchurch and Ganarew Group Parish Council has sought to allocate sufficient land for housing which it considers the community is most comfortable with provided it meets at least the minimum required by Herefordshire Local Plan Core Strategy and can be shown to be deliverable with a significant degree of certainty. In this regard it has chosen sites with the greatest advantages/least disadvantages. Sites were ranked according to a range of criteria within a robust approach by a Steering Group set up from the Parish Council and local community.</p>	

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	Policy WG1		<p>In general, we support this policy. However, we believe that reference to the housing target should be set out under WG2 (Development Strategy) rather than WG1, which is intended to establish how sustainable development within the Parishes is to be achieved. We note that there is no reference within WG1 to the role that tourism and tourism accommodation will play within the local economy. Given that WG9 offers clear support to leisure and tourism it seems entirely appropriate to recognise this within the terms of Policy WG1</p> <p>Policy WG1 is a broad-based policy recognising the components of sustainable development and the aspects of these that are considered relevant to the community of the Group Parish. The reference to economic development more generally is considered most appropriate with no need to refer specifically to tourism or any other forms of those business activities within the Group Parish, of which there are many.</p>	No change proposed as a consequence of this representation
	Policy WG2		<p>We object to this policy as currently drafted. For the reasons discussed previously we believe that the housing strategy should be amended in order to meet basic conditions, with additional sites allocated to meet housing needs, including the need to deliver affordable housing and appropriate homes for the ageing population. As discussed above, we also believe Policy WG2 should set the housing target for the Neighbourhood Plan area rather than it being contained under WG1. With regards to Part e) of the policy, which relates to leisure and tourism, we consider this should include specific reference to tourism accommodation east of Whitchurch, as this will inevitably play a role in supporting tourism economy.</p> <p>The policy sets out the strategy for the location of development within the Group Parish and is considered consistent with Herefordshire Local plan Core Strategy. It is not site specific. With regard to housing, the NDP must meet the provisions of Herefordshire Local Plan Core Strategy RA2 which specifies Whitchurch and Symonds Yat west as settlement, and Herefordshire Council promotes the use of settlement boundaries (or suitable alternatives) (para 4.8.23) which this policy promotes. It also indicates sites will be allocated for housing in Whitchurch which falls within table 4.14 as opposed to Symonds Yat West which is within table 4.15. In these regards, the policy is not site specific or refers to any particular boundaries. There is no reason why this policy as opposed to policy WG1 should contain reference to the level of housing growth being sought. Tourism development across the Group Parish would fall under criterion f) which would enable this to take place where it is of an appropriate scale. Tourism and visitor development to the east of Whitchurch is a more specific issue relating to a concentration of activities that related to historical development and of a scale that would not be appropriate across the Group Parish and AOB more generally.</p>	No change proposed as a consequence of this representation
	Policy WG3		<p>We object to this policy as currently worded. We firmly believe that additional sites need to be allocated for housing, including land at Delburne Farmhouse (also referred to as Daffyr Nant bungalow) and these should be shown on the Policies Map. The policy should also be amended to remove reference committed sites, as these already have planning permission as clearly the policy is intended to set out circumstances where housing development would be accepted in Whitchurch, so this would obviously include windfall sites and sites allocated for housing.</p> <p>The first issue is considered below under WG4. With regard to committed sites, these have received planning permission but have not yet commenced. Herefordshire Council show these as committed sites upon their County Policies Map which includes village policies maps for neighbourhood plans. These may be outline planning permissions and if full permissions, developers may seek to renew or change the form and layout. Consequently, they should continue to be referred to in order that any changes/reserved matters are covered by the NDP.</p>	No change proposed as a consequence of this representation

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			<p>Note has been taken of Herefordshire Council's Guidance Note 20 viz:</p> <p><i>'Recent development - Where appropriate, settlement boundaries should include new developments which may have occurred recently. It is also advisable to include sites that have received planning permission within the settlement boundary.'</i></p>	
	Policy WG4		<p>The policy should be amended to include 0.54 ha of land adjacent to Delburne Farmhouse (also referred to as Daffyr Nant bungalow), as shown on the enclosed site location plan and indicative layout.</p>  <p>The site submitted by this representation for inclusion was considered following the 'Call for sites' and found to be less favourable than those chosen. Those chosen ensure that the required level of proportional growth will be met. This site is distant from the main built-up area of Whitchurch settlement and would in this respect fail to meet the provisions of Herefordshire Local Plan Core Strategy Policy RA2. It is also understood that Herefordshire Council has considerable reservation about pedestrian access to Whitchurch for a similar site in this vicinity.</p>	No change proposed as a consequence of this representation
	Policy WG8		<p>We generally support this policy, but there needs to be recognition that viability may prevent full compliance with this policy. Suggest wording is amended to allow viability to be considered.</p> <p>This policy complements Herefordshire Local Plan Core Strategy policy SD1 and there is no reference to viability within that policy.</p>	No change proposed as a consequence of

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				this representation
	Policy WG9		<p>We are in general support of this policy but we believe that the policy should make specific reference to tourism accommodation being acceptable east of Whitchurch.</p> <p>This policy covers an area where a concentration of activities exist predominantly based upon tourism associated with the River Wye. It is needed in order to ensure that such development within this area is managed in a sensitive way so that any intensification does not conflict, in particular, with the landscape of the Wye Valley AONB, The River Wye SAC and various other assets. Tourism development outside of this area are not resisted but covered by other policies for business in general, including those in Herefordshire Local plan Core Strategy.</p>	No change proposed as a consequence of this representation
	Policy WG12		<p>We object to this policy and believe it should be deleted. In most cases working from home does not involve activities that require planning permission. Furthermore, extensions to dwellings or the erection of outbuildings can be carried out under permitted development. In circumstances where a planning application is required the impacts of the proposed development will be controlled by other policies of the local plan along with Policy WG7 of the Neighbourhood Plan.</p> <p>This policy complements Herefordshire Local Plan Core Strategy Policy E3 and is included to specifically support this form of business where it does not adversely affect residential amenity. Policies on home working have been included in other neighbourhood plans and there is no reason why this NDP should not promote this form of development where it requires planning permission. A site for three large houses has no benefits in terms of providing affordable housing which the representation has identified as a major concern. The site could be offered and considered for affordable housing in this respect under Herefordshire Local plan Core Strategy policy H2</p>	No change proposed as a consequence of this representation
C.11 M J Ferrigan	Policy WG5 and Map 3	Objection	<p>I was extremely concerned to note, from the above, that it is being proposed that this boundary should pass along Ferrie Lane/Washings Lane. Whilst I appreciate that, on map 3, this appears to be a very neat solution I am convinced that the proposal has failed to take into account the <u>actual</u> situation along this BOAT. My comments relate, primarily, to the length of lane between “Ye Old Ferrie Inn” and “Alpine Cottage”.</p> <p>I will call this section of lane Ferrie Lane* and have listed my concerns below:</p> <ol style="list-style-type: none"> 1. All of the flat land to the sides of Ferrie Lane is in a flood plain and practically all of the undeveloped land floods on a regular basis making it totally unsuitable for development. 2. Ferrie Lane itself is regularly blocked by floodwater, in two places, and therefore becomes virtually impassable to both vehicle and pedestrian traffic. It is highly unlikely that the Highways Department would fund the work necessary work to remove this problem even if this is actually possible. 3. This section of Ferrie Lane is approx. 5-600 metres long and it is a “single track” road. There are no passing places except for the private property upon which residents park their own vehicles. There is also one section, of approx. 300 metres, where there are no passing places at all and drivers can be forced to reverse for a considerable distance along a twisting poorly defined lane with a sharp drop on one side. This situation would 	No change proposed as a consequence of this representation

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			<p>significantly deteriorate if traffic volumes increase due to any development along the lane. Cars are regularly being damaged today, either by less than perfect reversing or by poorly attempted three point turns on private parking areas and any increase would be most unwelcome.</p> <ol style="list-style-type: none"> 4. Any development(s) along the lane would almost certainly require that large quantities of materials be delivered to site(s) by dumper truck etc. Without significant work Ferrie Lane is neither wide enough nor in sufficiently good condition to support this type of traffic. In fact, as it is highly unlikely that the Highways Department would actually upgrade or properly maintain Ferrie Lane any developments would be likely to render the lane unusable and force its closure with calamitous consequences to both residents and visitors. 5. The services, with the exception of mains water, that are provided to properties along Ferrie Lane are hardly of the standard/reliability that one would expect in the 21st century. The area is almost certainly unsuitable for further development without significant investment by the Utility companies. Given the nature of the area and the low customer density any such investment is highly unlikely. 6. Ferrie Lane is currently in a deplorable state with numerous potholes, crumbling surfaces, collapsing edges, significant cracks and some areas gently sliding towards the river. In fact, it is not really in adequate condition for the current levels of traffic. Despite both the Highways Department and the Parish Council being made aware of the problems virtually no maintenance work has been undertaken for at least ten years. The only exception being the repair work undertaken and funded by residents (primarily to reduce the damage caused to own their vehicles and to improve access for the emergency services). Given that this situation is highly unlikely to change it would appear totally illogical to subject this area to further development and the consequent increase in traffic which would only accelerate the damage to Ferrie Lane. 7. Practically all of this section of Ferrie Lane either adjoins or is part of a SSSI. One would therefore assume that any developments would be blocked by those parties responsible for the protection of the area's flora and fauna. <p>In short, the proposal to place the Symonds Yat Settlement Boundary along Ferrie Lane is both inappropriate and fraught with practical difficulties. It would almost certainly alienate existing residents and probably restrict Ferrie Lane's use as a thoroughfare for both residents and the thousands of tourists who regularly visit this area. It should also be remembered that in the last few years Hereford Council served notice upon the residents of Ferrie Lane (subsequently rescinded) that refuse collections could no longer be made from their properties due to the dangerous state of the lane.</p> <p>I would suggest that a more appropriate boundary would be within the vicinity of the upper road (B4164) where, I suspect, most of the problems that I have listed above would be no longer applicable.</p>	

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			<p>* This section of the lane can be referred to either as Washings Lane or Ferrie Lane. I have chosen the latter to simplify the text.</p> <p>The defining of a settlement boundary for Symonds Yat West does not of itself mean that all areas within this can be developed. Development will only be permitted provided relevant criteria can be met.</p> <p>Development proposals within Symonds Yat Settlement Boundary must be considered against all relevant policies included within the NDP and not just Policy WG5. In relation to the points made:</p> <ol style="list-style-type: none"> 1. Proposals must meet policy WG17. There are sufficient sites made available within the NDP to meet the required level of proportional growth and consequently no reason to make exceptions in relation to flood risk where this is provided for through the exception and sequential tests. 2. The same provision applies to this as in 1 above. 3. Proposals would need to comply with policy WG21 which cover this matter. 4. The same provisions apply as in 3 above. 5. The provision of utilities is an economic one that is not covered by planning policies and if they indicate a scheme is not viable then it is unlikely to proceed. The required level of proportional housing growth does not depend upon development along Ferrie Lane. 6. The same provision applies as in 3 above. 7. Proposals would need to comply with Herefordshire Local Plan Core Strategy policy LD2 (see NDP policy WG15). <p>It is recognised that there may be locations within settlement boundaries where it would not be possible to meet policy requirements set out within the NDP. This is not unusual. However, it is felt that the possibility limited opportunities should not be ruled out.</p>	
C.12 A Robinson	Policy WG5		<p>The significance of (a) seeking to define the boundary of SYW where none has existed previously; and (b) the precise details of where that boundary is drawn, is not entirely clear from the NDP. However, defining the SYW settlement boundary as set out at Map 3, merely “around the main concentration of dwellings” excludes other less developed areas which most would consider to be also part of SYW. Consequently, this gives a false impression that SYW is only that “main concentration of dwellings”, whereas it is a wider area, predominantly of natural landscape wherein buildings are sparse and well-spaced out. As the report itself observes, SYW “comprises of a loose assemblage of dwellings”.</p> <p>Defining SYW by reference only to its developed aspect may lead to insufficient weight being attached to the fact that, in reality, SYW is a relatively undeveloped area and the importance of not adversely affecting this.</p> <p>However, if and to the extent that this boundary will serve to encourage and/or facilitate additional development within SYW, I make the comments/observations set out below with particular reference to those sites which I am most familiar with, NP04 – Pump House; and NP19 – Erwarton, both Washings Lane. However, these comments are likely to also have applicability to other of the sites identified in Map 1:</p>	No change proposed as a consequence of this representation

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			<p>It is difficult to conceive of sites less likely to meets the critical criteria of:</p> <ul style="list-style-type: none"> • Topography – development of these sites would not fit with the landscape, countryside and scenery of these sites. As the report notes, these are of particular importance to locations with a rich diversity of scenery and designated an Area of Outstanding Beauty (AONB) with Sites of Special Scientific Interest (SSSI) and the River Wye Special Area of Conservation (SAC). • Proximity to services – perhaps not quite what was meant by “services” in the report, but I am thinking here of the lack of services such as gas, water, electricity, mains sewerage etc. and the difficulties in connecting those services to these sites. • the viability of the proposed sites and the level of practicality for construction of dwellings thereon – addressed further below • Alignment of the proposed site to parishioner feedback – I cannot believe that any development on these sites would be met with anything other than universal opposition from everyone but the site owner. <p>Due to its widely spaced historic development and it significance as an AONB, SSSI and SAC, SYW ought to be treated in the same way as open countryside and not within the terms of Herefordshire Local Plan Core Strategy Policy RA2, but rather to be considered under Core Strategy policy RA3 and outside of the NDP process. New development/building on these sites would be contrary to this policy because it would:</p> <p>Be detrimental to (and definitely NOT bolster or improve) existing service provision, facilities and infrastructure – which can barely cope with the limited existing needs, much less the additional burden that would result from construction traffic and subsequently from additional houses on these sites;</p> <ul style="list-style-type: none"> (a) Not meet any identified needs of the SYW community; (b) Be contrary to (and not reflective of) the size, role, function and character of SYW; (c) The relatively sparseness of development within SYW is a key factor in SYW’s unique character. Development on these sites would detract from that special character, whereas development proposals are expected to demonstrate particular attention to the form, layout, character and setting of the settlement and/or to result in development that contributes to, or is essential to the social well-being of the settlement concerned. Development on these sites would fail both of these tests; and would be wholly negative to SYW’s environment and its landscape setting. <p>I question what, if any <i>local</i> demand (as opposed to demand from outside the area and/or for holiday homes – neither of which is what the Neighbourhood Plan is intended to address) it is anticipated would be met by further development on these sites.</p>	

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			<p>Washings Lane is wholly unsuitable for use by the sort of construction vehicles that would be required to build new houses on these sites. This problem would be exacerbated by the lack of suitable off road parking for construction vehicles at these sites. This would be so even if Washings Lane was in good condition, however, the condition of roads in SYW is appalling; and Washings Lane is one of the worst of all of them. It is extremely narrow with very few passing places, it is full of potholes and in several places it is crumbling away at the edges. It has a very poor surface and is barely more than a rough track in many places. It is also prone to flooding – as are both the identified Washings Lane sites.</p> <p>I dread to think what the condition of Washings Lane would be after it had been subject to construction traffic and after it had been dug up to facilitate the provision of services such as water, electricity, etc. at the sites. Add to this the confusion as to who is responsible for the upkeep of Washings Lane – certainly no-one has actively taken on its upkeep. How much less likely is that anyone will do this after it has further deteriorated from additional construction and other traffic?</p> <p>Washings Lane can barely cope with the limited use it gets now; it would be nonsense to do anything which would increase vehicular traffic along it – initially from construction traffic and thereafter from additional residents/occupiers. The damage and disruption that would be caused by allowing development at these sites would be hugely disproportionate to the relatively limited contribution these sites could make to the Neighbourhood Plan.</p> <p>At paragraph 5.8 the report recognises that new development ought only to be allowed where, in particular, it does not adversely affect SYW’s special character; and acknowledges that development may be restricted by the nature of the local road network. In light of this, it is ludicrous to even consider either of these sites for development.</p> <p>Development at these sites would necessarily detract from the unique character of this area; and would be entirely contrary to what makes SYW such as special and attractive place.</p> <p><u>Contravention of local and national planning policies</u></p> <p>Symonds Yat is a small, open and rural settlement in an AONB and SSSI where planning applications should be considered particularly carefully. It is an area predominantly of natural landscape where buildings are sparse and well-spaced out.</p> <p>One of the roles of planning policies is to protect and enhance the quality of the natural and historic environment and to contribute positively to making places better for people. Applications which are inappropriate in their context, or which fail to improve the character and quality of an area should be refused.</p> <p>Development within SYW and at the Washings Lane sites in particular would be detrimental to the quality, character and amenity value of the area and would contravene both the Government’s National Planning Policy Framework and also the Herefordshire Local Plan Core Strategy. Limited references to these policies are set out below:</p>	

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			<p>a) <u>National Planning Policy Framework</u></p> <p>The Government’s National Planning Policy Framework states that:</p> <p>i) the purpose of the planning system is to contribute to the achievement of sustainable development, to which there are three dimensions. One of these is the environmental dimension which gives rise to the need for the planning system to <i>contribute to protecting and enhancing our natural, built and historic environment.</i></p> <p>ii) Rather than protect and enhance its environment, development within SYW would detract from it. Certain core principles underpin the planning system (Paragraph 17). These include that developments should:</p> <ul style="list-style-type: none"> • enhance and improve the places in which people live their lives; • recognise the intrinsic character and beauty of the countryside; and • contribute to conserving and enhancing the natural environment. <p>iii) (At paragraph 58) Planning policies and decisions should aim to ensure that developments:</p> <ul style="list-style-type: none"> • will function well and add to the overall quality of the area; and • respond to local character and history and reflect the identity of local surroundings and materials. <p>iv) (At paragraph 59) ... design policies should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.</p> <p>v) (At paragraph 109) The planning system should contribute to and <i>enhance</i> the natural and local environment by protecting and enhancing valued landscapes,</p> <p>vi) (At paragraph 115) Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and <i>Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.</i></p> <p>Development within SYW would contravene each and every one of these National Policy requirements.</p> <p>b) <u>Herefordshire Local Plan Core Strategy</u></p> <p>The Local Plan recognises both:</p> <p>i) the need to protect, conserve and enhance valued natural, historic and built environments, including areas of outstanding natural beauty, special areas of conservation, open spaces as well as the county’s intrinsic attractive character; and that</p> <p>ii) the river valley landscape [of which Symonds Yat is an important part] is the county’s principal geographical feature; and the River Wye and its valley setting is integral to Herefordshire’s identity.</p> <p>It is readily apparent from the Local Plan that great value is placed on the area’s:</p> <p>i) environmental resource;</p>	

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			<p>ii) natural beauty;</p> <p>iii) quality of landscape;</p> <p>iv) green infrastructure (Figure 5.2 at paragraph 5.3.17 of the plan notes that “green infrastructure” ranges from entire AONB’s and SSSI’s at a County/regional level to private gardens at a local level); and</p> <p>v) local distinctiveness</p> <p>and that protecting, conserving and enhancing these assets is of very high importance.</p> <p>The protection of Symonds Yat’s visual and historic qualities is required by (at least) Core Strategy Objectives 9, 10 and 12 of the Herefordshire Local Plan Core Strategy document and is supported by various policies which would very likely be breached if development were to take place within SYW. These policies include (amongst others):</p> <p>i) E4 (Tourism) – This provides that Herefordshire’s tourist industry (which is vitally important to Symonds Yat) will be supported by a number of measures including having particular regard to conserving the landscape and scenic beauty in the Areas of Outstanding Natural Beauty;</p> <p>ii) SS6 (Environmental Quality and Local Distinctiveness) – Development proposals should conserve and enhance those environmental assets that contribute towards the county’s distinctiveness, in particular its settlement pattern, landscape, biodiversity and heritage assets and especially those with specific environmental designations;</p> <p>iii) LD1 (Landscape and Townscape) - Development proposals should:</p> <ul style="list-style-type: none"> • demonstrate that character of the landscape and townscape has positively influenced the design, scale, nature and site selection, protection and enhancement of the setting of settlements and designated areas; and • conserve and enhance the natural, historic and scenic beauty of important landscapes and features, including Areas of Outstanding Natural Beauty, nationally and locally designated parks and gardens and conservation areas; through the protection of the area’s character. <p>Again, further development within SYW and at the Washings Lane sites in particular would breach each and every one of these Local Plan requirements.</p> <p>The defining of a settlement boundary for Symonds Yat West does not of itself mean that all areas within this can be developed. Development will only be permitted provided relevant criteria can be met. Issues such as highway safety, drainage, effect on the landscape, retaining the settlement’s character and others are all relevant. A number of settlement specific criteria are set out in Policy WG5 but all relevant policies within the NDP need to be considered. Highways aspects and land stability is a material consideration when making planning decisions.</p> <p>There are no sites proposed for housing within Symonds Yat West. Development would have to come forward on a windfall basis where criteria set out in the NDP are met.</p>	

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			<p>Symonds Yat West is identified as a settlement where proportional growth might take place within Herefordshire Local Plan Core Strategy. This is an adopted plan which has been examined by a Government Inspector and found to be sound. The Parish Council is not able to change that designation and so it cannot be treated as open countryside.</p> <p>Highway requirements that would be relevant to Washings lane, and other roads within the settlement boundary and on its approaches, and that would need to be met are set out in policy WG21.</p> <p>Policy WG5 seeks to preserve the character of the settlement through the specific criteria that it contains.</p> <p>Policies are set out in the NDP to ensure that the relevant provisions within the NPPF and the Local Distinctiveness Policies in the Core Strategy are appropriately met.</p>	
C.13 J Dixon	Policy WG3 and Map 3		<p>The proposes settlement boundary for Symonds Yat West is at odds with Policy WG1 of the roads and transport theme (namely issue of inappropriate infrastructure, drainage and parking). Question whether these issues have been addressed. Access and general services within the proposed settlement boundary is abysmal. Development is not in the best interest of the community. Driving along the B4164 is now tedious at best and dangerous for pedestrians. The boundary is ill conceived. Do we really want the Parish heaving with people and traffic? What do we want the area to look like in 10-15 years from now? Step back and consider the bigger picture.</p> <p>The defining of a settlement boundary for Symonds Yat West does not of itself mean that all areas within this can be developed. Development will only be permitted provided relevant criteria can be met. Issues such as highway safety, drainage, effect on the landscape, retaining the settlement's character and others are all relevant. A number of settlement specific criteria are set out in Policy WG5 but all relevant policies within the NDP need to be considered. Highways aspects and land stability is a material consideration when making planning decisions.</p>	No change proposed as a consequence of this representation
C.14 J L Morris	Policy WG3		<p>The housing policy of March 2018 stipulates a restriction of 65 properties/dwellings. This should be included in the document and adhered to.</p> <p>It is not possible to restrict the number of dwellings to exactly 65 as this would be considered contrary to the requirement to plan 'positively'. Some flexibility has to be afforded in order for the NDP to meet the 'Basic Condition'. To prepare a NDP that does not meet the 'Basic Condition' would not be possible and not to prepare a plan would result in either developer led developments or Herefordshire Council allocating sites through its Rural Areas Sites Allocation Development Plan Document. The approach adopted to provide for slightly greater provision, including site allocations, is considered the best way to address the community's aspirations.</p>	No change proposed as a consequence of this representation
	Policy WG16		<p>No new housing areas should be constructed near to Listed Buildings or heritage sites as per para 6.2.4.</p> <p>Development next to Listed Buildings need not of itself be to their detriment. The analysis provided in para 6.2.4 indicates that there would be benefits provided a sympathetically designed scheme were brought forward as required by policy WG16.</p>	No change proposed as a consequence of this representation

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
	Policy WG20		<p>Housing areas contradict the traffic policy WG20. Single dwellings contribute less in terms of traffic impact especially given proximity to Whitchurch Primary School (6.2.4).</p> <p>The allocated sites are relatively small, especially that to the west of Old Court Hotel. Herefordshire Council has not objected to the housing allocations on the basis of highway concerns and consequently it cannot be concluded that the sites conflict with policy WG20.</p>	No change proposed as a consequence of this representation
C.15 A and C McKnight			<p>In agreement with many of my neighbours I would like to state that Meeks Well Lane and Ashes Lane could barely stand any further traffic and so development on these sites could bring considerable attendant problems. The Drag “road” merely consists of two concrete channels (fitted privately I believe) and therefore the land either side I would deem unsuitable.</p> <p>The physical state of Ashes Lane’s surface is appalling – riddled with potholes from top to bottom and only just passable. It is not suitable for the increasing numbers of delivery vans which are now trying to negotiate it – sometimes with unfortunate consequences for the drivers of the vans who get stuck and the inhabitants who cannot then get past the obstruction.</p> <p>Lastly any programme which might necessitate re-routing of traffic along Ashes and Meeks Well Lanes would lead to chaos and therefore should be avoided if at all possible.</p> <p>The defining of a settlement boundary for Symonds Yat West does not of itself mean that all areas within this can be developed. Development will only be permitted provided relevant criteria can be met. Issues such as highway safety, drainage, effect on the landscape, retaining the settlement’s character and others are all relevant. A number of settlement specific criteria are set out in Policy WG5 but all relevant policies within the NDP need to be considered. Highways aspects and land stability is a material consideration when making planning decisions.</p>	No change proposed as a consequence of this representation
C.16 C Andrews			<p>I have a large garden and would be interested in providing half an acre for two or three low cost housing plots to assist the younger members of our community to remain within Whitchurch, rather than be forced to move into our neighbouring towns. My son is a Crew Commander and my granddaughter a retained Firefighter at Whitchurch Fire Station, as a family we are very aware of the lack of housing opportunities for those on a low income or just starting out. I am also concerned the average population age of the village is increasing which causes significant difficulties in recruiting to our fire service and in providing workers for our local business.</p> <p>A ‘Call for Sites’ was undertaken which resulted in many areas of land being submitted. These were considered against a range of criteria and those considered best chosen for allocations. To open up the process for further submissions would be in the best interests of preparing the Plan. However, should the area referred to be within a defined settlement boundary, or meet the amended provisions to Policy WG3, then it may be considered as a windfall site making a contribution towards housing requirements, should it comply with appropriate criteria. Should the site not be within a settlement boundary then it could be offered to a housing association to provide affordable housing for local needs under Herefordshire Local Plan Core Strategy policy H2 or utilise revised policy WG3.</p>	See change No 10
C.17 E Curtis	Introduction	Comment	Reiterating the criteria by which the plan should be judged as to whether it meets its objectives, i.e. takes into account parishioner wishes for the culture and heritage of the parish.	No change proposed as a

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			<p>The NDP has tried to take into account the culture and heritage of the area and its settlements bearing in mind the current planning policies set out in both the National Planning policy framework and Herefordshire Local Plan Core Strategy. It is felt that the appropriate weight has been given to these two factors within both the policies and the proposals in the NDP.</p>	consequence of this representation
	<p>Paragraph 4</p> <p>Assessment criteria</p>		<p>When you review the proposed sites alongside the Assessment criteria it is very difficult to logically understand how certain sites have been put forward when they do not meet the criteria? Although I completely understand and agree with the need to build new houses in Symonds Yat and the extended Parish this needs to be done sympathetically and in keeping with the unique area. Are we just trying now to meet the Herefordshire Local Plan Core Strategy Policy and ignoring the assessment criteria?</p> <p>Suitability: Describes whether the site meets a range of critical criteria including topography, to assure the site’s development fits with landscape, countryside, scenery and other important considerations. This is of particular importance to a parish with such diversity of scenery and designated an Area of Outstanding Beauty (AONB) with Sites of Special Scientific Interest (Including the River Wye SAC). Further considerations amongst others which assist in differentiating between sites include: proximity to services, community facilities, shops, school, transportation, recreational areas and local employment areas e.g. industrial estates and local businesses. Several areas that now fall within the proposed settlement boundary do not meet this criteria ranging from poor infrastructure i.e roads to support construction, drainage requirements, sites that previously have been ‘blocked’ are now potential planning areas that sit on the flood plain? The land behind the ‘historic listed Old Court’ could potentially see dwellings built on it – how is that in keeping with the culture and heritage of our unique area?</p> <p>If the settlement boundary is marked to take in lanes such as Washings Lane, Meekswell, Ashes Lane – most of these lanes are un-adopted – they are in very poor condition currently with flooding, the area and the roads are very prone to subsidence as the hill is moving – it is difficult to understand how this area could be opened up to encourage more construction work when the infrastructure is so fragile that it barely supports the local residents use as it currently stands?</p> <p>Determining whether a site should be allocated for housing within the NDP involves judging land against a range of criteria, some of which are positive and some negative. It is a matter of balancing competing requirements and judging degrees of benefits and disadvantages and the degree of weight given to each. Decisions are rarely black and white. Mostly they are ‘best fit’.</p> <p>The defining of a settlement boundary for Symonds Yat West does not of itself mean that all areas within this can be developed. Development will only be permitted provided relevant criteria can be met. Issues such as highway safety, drainage, effect on the landscape, retaining the settlement’s character and others are all relevant. A number of settlement specific criteria are set out in Policy WG5 but all relevant policies within the NDP need to be considered. Highways aspects and land stability is a material consideration when making planning decisions.</p>	No change proposed as a consequence of this representation

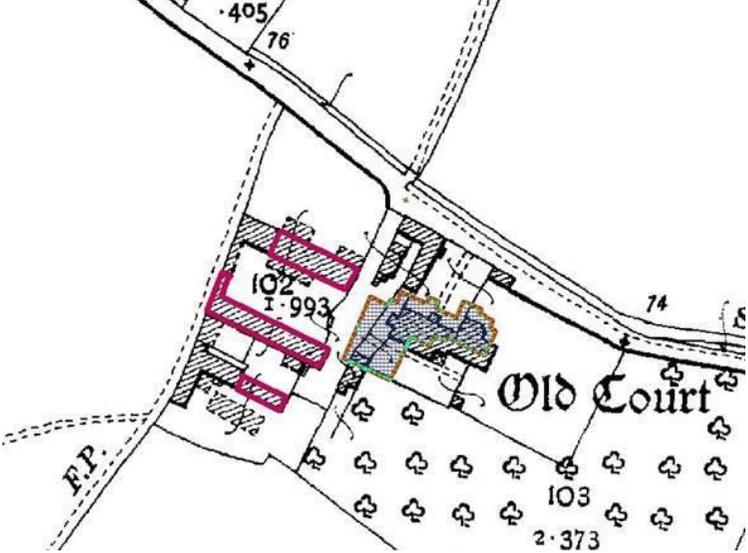
Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
	Paragraph 5/Table 1/Policy WG5	Objections	<p>SYW: Due to this unique area and its significance as an AONB, SSSI and SAC, SYW ought to be treated in the same way as open countryside and not within the terms of Herefordshire Local Plan Core Strategy Policy RA2, but rather to be considered under Core Strategy policy RA3 and outside of the NDP process – it is unique and should be treated as such – it feels a bit round peg square hole.</p> <p>Symonds Yat West is identified as a settlement where proportional growth might take place within Herefordshire Local Plan Core Strategy. This is an adopted plan which has been examined by a Government Inspector and found to be sound. The Parish Council is not able to change that designation and so it cannot be treated as open countryside.</p>	No change proposed as a consequence of this representation
	Policy WG5		<p>As a local who has lived in SYW for over 30 years I am gravely concerned by the contents of the Neighbourhood Plan in particular the Settlement Boundary for SYW. I would question why now there is the need to define this and would also question the driving motivations behind highlighting areas for potential development that are wholly unsuitable and completely contravene the assessment criteria that you yourselves have set out? Is there an agenda that we are unaware of over and above trying to deliver to the Strategy Plan that's driving irrational thinking and poor recommendations/ planning?</p> <p>Development on these sites will detract from the unique nature of the area which is an AONB and SSSI and again completely disregards paragraph 5.8 which recognises that new development ought only be allowed where, in particular, it does not adversely affect SYW's special character and acknowledges that development may be restricted by the nature of the local road network.</p> <p>Defining a settlement boundary for Symonds Yat West is considered the best way to address development within it given its definition as a settlement where proportional growth might take place within Herefordshire Local Plan Core Strategy. To have remained silent about what the settlement comprises would have resulted in considerable uncertainty about the extent of development that might take place there. There are no housing areas identified for potential development within the settlement boundary. The approach taken has been to define criteria against which proposals within it might be judged. These would include effect on the Wye valley AONB and the River Wye SSSI.</p>	No change proposed as a consequence of this representation

Schedule 2: Stakeholder Representations and Response

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
S.1 Herefordshire Council (Statutory Consultee)	Whole Plan	Comment	<p>Have no historic building comments on the NDP and cannot see any biodiversity conflicts in relation to the proposed sites regarding any designations or habitat constraints.</p> <p>Developments such as hospitals, homes and schools may be considered ‘sensitive’ and as such consideration should be given to risk from contamination notwithstanding any comments. Please note that the above does not constitute a detailed investigation or desk study to consider risk from contamination. Should any information about the former uses of the proposed development areas be available I would recommend they be submitted for consideration as they may change the comments provided. It should be recognised that contamination is a material planning consideration and is referred to within the NPPF. I would recommend applicants and those involved in the parish plan refer to the pertinent parts of the NPPF and be familiar with the requirements and meanings given when considering risk from contamination during development. Finally it is also worth bearing in mind that the NPPF makes clear that the developer and/or landowner is responsible for securing safe development where a site is affected by contamination. .</p> <p>Provision is made to cover these issues within policies within the NDP, with contamination in particular covered in Policy WG8</p>	No change proposed as a consequence of this representation
	Front Page	Suggest change	<p>Needs to have the plan period on it. This can be from 2018-2031 or 2011-2031</p> <p>Advise noted and change will be made</p>	See change No 1
	Paragraph 2.2.1	Suggest change	<p>Currently states <i>much the greater area of the parish is under some statutory designation</i> I would suggest replacing this with ..much of the parish is protected by a statutory designation.</p> <p>Grateful for advice</p>	See change No 7
	Paragraph 2.2.4	Minor correction required	<p>There is a large gap between Herefordshire .. Council Landscape character assessment</p> <p>Grateful for advice</p>	Format changed
	Paragraph 2.25	Suggest change	<p>Currently states <i>the land varies between</i> I would recommend replacing this with the land ranges between. The word whether has a gap in it</p> <p>Grateful for advice</p>	See Change No Typo corrected
	Paragraph 2.2.7	Minor correction required	<p>Spells Garren Brook elsewhere spelt Garron</p> <p>Grateful for identifying this typo</p>	Typo corrected
	Paragraph 3.4.2	Minor correction required	<p>The word its has a gap in it</p> <p>Grateful for identifying this typo.</p>	Typo corrected
	Paragraph 3.5.2	Comment	<p>If this hasn't been requested before, please make sure that Balfour Beatty know the Parish's request to change the speed limit. This will help with backing up any required change that development may provide.</p>	

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			This paragraph highlights local issues as an input into the development of policies. In this instance it provides some of the basis for the development of Policy WG20 and reflects Herefordshire Local Plan Core Strategy Policy SS4 (final paragraph).	No change proposed as a consequence of this representation
	Paragraph 3.5.4	Comment	S106 monies for improvements to infrastructure only starts for developments higher than 10. Whilst I understand that the parish do not want large developments, it may help in capturing monies for highway improvements within the area. This paragraph is not related to S106 monies but to Herefordshire Local Plan Core Strategy Policy SS4 (final paragraph)	No change proposed as a consequence of this representation
	WG1	Suggest changes	<p>In general conformity with Herefordshire Local Plan Core Strategy.</p> <p>(a) sets an implied housing limit of 65 dwellings, conflicts with CS which sets minimum targets and also would not allow flexibility if a brownfield or proposal with enhancements or wider benefits comes forward once the 65 has been approved (e) - or severe impact on the highway for all users. This could also include facilities to encourage active travel e.g. cycle parking and shower facilities for businesses. (f) - We would suggest the use of the term 'active travel', as you have used on page 61.</p> <p>Conformity noted. The reference to 65 is not stated as a maximum but the required figure indicated by Herefordshire Council. However, a change to refer to this being the minimum is proposed. In relation to (e) 'severe impact' is considered too high a standard in terms of effect on users. The policy also takes into account the effects of traffic on amenity which is a planning issue and not a highways matter. This policy is a high-level one that sets out principles rather than detail so infrastructure such as cycle parking and shower facilities would be covered under the general reference in more detailed policies. With regard to (f) 'active travel', does not encompass all forms of sustainable transport. The latter can encompass 'active travel'.</p>	See change No 8
	WG2	Objection	<p>Conformity with Herefordshire Local Plan Core Strategy uncertain. Use of the word "limited" when referring to new housing/expansion of employment areas- Though no definite "cap" appears to be proposed, this could be interpreted as adopting a negative approach to planning for growth. A suggested replacement would be "proportionate. DM considers policy constrains Symonds Yat development contrary to CS RA2 policy.</p> <p>Remove 'limited' expansion of employment areas. I would replace this with proportionate and sensitive expansion of employment areas. Instead of small sized replace with small scale housing sites.</p> <p>Changes are proposed to remove the word 'limited' in the two locations referred to in order to allay the concerns. The insertion of 'proportionate' in relation to housing is accepted. Given the NPPF provisions in relation to business and enterprise growth the reference to 'sensitive' is accepted as an appropriate alternative to reflect both 'well designed' and for expansion to be of an appropriate scale.</p>	See change No 9
	WG3	Comment	<p>In general conformity with Herefordshire Local Plan Core Strategy</p> <p>Noted</p>	No change proposed as a consequence of this representation

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	<p style="text-align: center;">Comment Parish Council Consideration (in blue)</p>	Response to representation
	WG4	Comment	<p>In general conformity with Herefordshire Local Plan Core Strategy.</p> <p>Concerns are expressed at the proposed housing site to rear of the Old Court Hotel. The hotel is Grade II* listed that in order to avoid future objection, a view is sought from our HBO section and/or Historic England. The land rises to the rear of the hotel and although I note the policy talks of a sensitive scheme, I think we need to understand how 6 units (including the barn conversion; which I would support) can be satisfactorily laid out without adversely affecting the setting of the hotel. I don't know enough of the other proposed site. If it is ultimately decided that the Site North of Old Court Hotel is acceptable I'd imagine that would be subject to a number of provisos concerning building scale and detailed design and would recommend an addition to WG2 to make the expectations of delivery on this site even more explicit. (Development Management)</p> <p>Amend description of the development in policy WG4 to the West of Old court. Request clarification of the site boundary. The mapping in the NDP is poor quality and it is not possible to determine the site extents.</p> <p>The proposals are for the conversion of the adjacent farm buildings and additional units to create 6 units overall. Looking at the early C20 historic mapping for the site, the barn to the N has already been converted. Provided that it is possible to include the 6 units sensitively within the site boundary of the historic farmstead we would have no objections to the proposals. We would recommend that the proposals are considered with reference to the Kent AONB guidance on additions to Farmsteads which provides useful guidance on how such developments can be made without harming the character and interest of the sites. This does not need to be within the NDP - existing adopted Core Strategy and NPPF policies would be enough to control the appearance and design of any extensions to the farmstead. (Building Conservation)</p>	See Appendix 1

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			 <p data-bbox="904 898 1809 922">Early C20 mapping showing existing buildings relating to the historic farmstead and its extent</p> <p data-bbox="766 959 1921 1098">It is my understanding the site comprises a number of barns. Some farm buildings may be used for the storage of potentially contaminative substances (oils, herbicides, pesticides) or for the maintenance and repair of vehicles and machinery. As such it is possible that unforeseen contamination may be present on the site. Consideration should be given to the possibility of encountering contamination on the site as a result of its former uses and specialist advice be sought should any be encountered during the development. (Environmental Health)</p> <p data-bbox="766 1134 1294 1158">Conformity noted. For other matters see Appendix 1.</p>	
	WG5		<p data-bbox="766 1169 1413 1193">In general conformity with Herefordshire Local Plan Core Strategy.</p> <p data-bbox="766 1225 1753 1249">Reword limited new housing, to 'Proportionate housing growth may take place within this boundary'.</p> <p data-bbox="766 1281 1872 1305">i) Tries to limit development to single dwellings contrary to CS RA2, 'exceptionally' is not defined (DM Comment)</p> <p data-bbox="766 1337 1895 1393">ii) Gaps greater than 100 meters needs further explanation. (Pont identified under WG4 but believe it relates to this policy).</p>	See changes No 17

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			<p>iv): In terms of seeking “appropriate sizes” of properties, this may not be easy to enforce when developments are restricted to primarily individual dwellings.</p> <p>iv) the final paragraph- Restoration of rural buildings/premises should be permitted where the building is also capable of conversion without major or complete reconstruction in accordance with RA5</p> <p>vii) Passing places and widening of the highway should be done in consultation with Herefordshire Council at an early stage in the planning process.</p> <p>Conformity noted. With Herefordshire Council having decided that Symonds Yat West should be defined as a settlement for the first time and promoting the use of settlement boundaries, this policy attempts to comply with these requirements while seeking to retain its very particular and unique character. The intension of reference to primarily ‘individual dwellings’ is to ensure the historic pattern of development comprising random roadside cottages and small holdings historically resulting from its ‘squatters’ heritage is maintained. A change is proposed to try to better reflect this form. Although the change to make reference to proportional growth will be made, this is not necessarily referred to in Policy RA2 and it is difficult to perceive how this will influence the level of development. A review of the reference to a 100m gap has been undertaken and in view of the limited evidence for this. An approach based upon describing what would be considered appropriate infill plots has replaced this to try to define how ‘proposals (will be expected to) demonstrate particular attention to the form, layout, character and setting of the site and its location in that settlement’ which is a requirement for those settlements falling within Table 4.15, which Symonds Yat West does. Predominantly the character of the settlement is one of single roadside cottages and small holdings, as defined in Herefordshire Council’s Landscape Character Assessment. This character is all the more important because of the settlement’s location within the Wye Valley AONB. The policy does not cover development outside of Symonds Yat West settlement boundary so Core Strategy policy RA5 is not relevant. This could, however, be made clearer. The provision of passing spaces will be needed where development is restricted by the width of any road and will be off-site works that will need to be agreed through the planning process where private land is involved or with the highway authority where it owns the land and hence Herefordshire Council will need to be involved.</p>	
	WG6		<p>In general conformity with Herefordshire Local Plan Core Strategy</p> <p>Noted</p>	No change proposed as a consequence of this representation
	WG7		<p>In general conformity with Herefordshire Local Plan Core Strategy</p> <p>Suggest an amendment to WG7 Housing Policy and Design with an additional para f) Ensure that new housing development is not be adversely impacted by existing agricultural or commercial activities.</p> <p>Conformity noted. The need to ensure adverse effects from neighbouring uses on new housing is accepted although is closely linked to criterion d) within which it might be include.</p>	See change No 23

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
	WG8		In general conformity with Herefordshire Local Plan Core Strategy Noted	No change proposed as a consequence of this representation
	WG9		In general conformity with Herefordshire Local Plan Core Strategy Noted	No change proposed as a consequence of this representation
	WG10		In general conformity with Herefordshire Local Plan Core Strategy Noted	No change proposed as a consequence of this representation
	WG11		In general conformity with Herefordshire Local Plan Core Strategy. Point d): The proposed new use for rural buildings should be capable of being accommodated without the need for ancillary buildings that individually or taken together would adversely affect the character/appearance of the building or setting/surroundings As mentioned above, some farm buildings may be used for the storage of potentially contaminative substances (oils, herbicides pesticides) or for the maintenance and repair of vehicles and machinery. As such it is possible that unforeseen contamination may be present on the site. Consideration should be given to the possibility of encountering contamination on the site as a result of its former uses and specialist advice be sought should any be encountered during the development. Conformity noted. NPPF para 28 bullet 1 allows for 'well designed new buildings' and while they may apply to conversion to dwellings the suggested qualifying requirements should not apply to development associated with business and enterprises. Policy WG8 covers the issue of contaminated land.	No change proposed as a consequence of this representation
	WG12		In general conformity with Herefordshire Local Plan Core Strategy Layout - it may be better if you list what you support rather than in a paragraph format. Conformity noted. It is accepted that there is no need to refer to Policies WG7 and WG8 as the NDP should be read as a whole and hence a change is proposed that should improve the format.	See changes No 26
	WG13		In general conformity with Herefordshire Local Plan Core Strategy Noted.	No change proposed as a consequence of this representation
	WG14		In general conformity with Herefordshire Local Plan Core Strategy Not sure how they quantify major development is legitimate (DM Comment)	No change proposed as a consequence of this representation

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			Conformity noted. There is no definition of ‘major development’ in the NPPF or Herefordshire Local Plan Core Strategy. Consequently, this policy covers the matter within the NDP area. It still requires judgment but indicates those factors that will be relevant.	
	WG15		In general conformity with Herefordshire Local Plan Core Strategy. <i>“the loss of any features, where absolutely necessary, shall be offset through full compensatory measures.”</i> This should apply to development that would potentially reduce the coherence and effectiveness of the ecological network. LD2 sets out further exception criteria based on the level at which biodiversity and geodiversity assets are designated Conformity noted. Core Strategy Policy LD2 will apply within the NDP area and its criteria have not been duplicated. The Emphasis in this policy is enhancement and the two policies should work in tandem.	No change proposed as a consequence of this representation
	WG16		In general conformity with Herefordshire Local Plan Core Strategy. <i>“...in order to comply with Herefordshire Local Plan Core Strategy policy RA3(6).”</i> This must also comply with RA5. (b) is over onerous and can’t be justified for every development, should be on a proportionate and relevant basis Other heritage assets, if unlisted, need to be listed and mapped, ideally as an annex. (Development Management). Policy appears sound and is supported from an archaeological perspective. Conformity noted. The line quoted has been misread within HC’s comment in that it does not refer to the conversion of rural buildings but new development in association with historic farmsteads. With regard to point (b) this was recommended by HC officers for another NDP, been accepted in a range of other NDPs although in a revised form which is now proposed. HC’s Archaeological Service supports the policy.	See change No 29
	WG17		Conformity with Herefordshire Local Plan Core Strategy uncertain. Development proposals should also have regard to the Strategic Flood Risk Assessment (2009) for Herefordshire. Residential development is categorised as a “more vulnerable” use by national guidance with regard to flooding. This would therefore suggest that development within flood zone 2 could be appropriate, subject to assessment The Environment Agency has pointed out that ‘As part of the adopted Herefordshire Council Core Strategy updates were made to both the Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS). This evidence base ensured that the proposed development in Hereford City, and other strategic sites (Market Towns), was viable and achievable. The updated evidence base did not extend to Rural Parishes at the NP level’. Consequently, it would be wrong to refer to the 2009 SFRA. It is recognised that some residential development might be possible within flood risk zone 2 under certain conditions and consequently a straightforward reference to requiring development to comply with the sequential and exception tests would be more appropriate.	See change No 30
	WG18		In general conformity with Herefordshire Local Plan Core Strategy	

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			Noted	No change proposed as a consequence of this representation
	WG19		In general conformity with Herefordshire Local Plan Core Strategy Noted	No change proposed as a consequence of this representation
	WG20		In general conformity with Herefordshire Local Plan Core Strategy Change to Highways England. 3- The NDP could encourage not only safer parking but improved active travel access to the schools for those who can. Some interventions could even include a park and stride scheme to reduce the number of cars adjacent to the school. 5- Include cyclists. Conformity noted. Change in name will be made. Improved active travel is covered by point 6 which is a more 'user friendly' reference. Cyclists added.	See changes No 31
	Paragraph 9.2.2		Change cycle paths to cycleways Noted and change proposed	See change No 32
	WG21		In general conformity with Herefordshire Local Plan Core Strategy A- Accesses should be designed in line with Herefordshire Council's Highway design guide with suitable visibility. Assessments/Statements. Development should also provide speed and volume surveys with the appropriate visibility splays meeting the 85th%ile speed of the road. B- Parking should be completely accommodated on site and should not lead to vehicles parking on the highway. Conformity noted. Comments on highways matters noted but these are covered by the criteria within this and other policies either specifically or in such terms as may be appropriate to planning policies that would normally be used as the basis for requiring the matters specified.	No change proposed as a consequence of this representation
	Paragraph 10.1.3		Safe access should be provided and any existing connections should be improved to promote active travel for all. The NDP should be read as a whole. These matters are covered by Policies WG8, WG20 and WG21.	No change proposed as a consequence of this representation
	WG22		In general conformity with Herefordshire Local Plan Core Strategy Noted	No change proposed as a consequence of this representation
	WG23		In general conformity with Herefordshire Local Plan Core Strategy Noted	No change proposed as a consequence of this representation
	WG24		In general conformity with Herefordshire Local Plan Core Strategy	

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			Noted	No change proposed as a consequence of this representation
	New Site	Suggest change	We have looked at heritage and landscape and consider there's potential for development on the lower ground before it rises up. This is limited to perhaps two dwellings adjoining the recent PP near the dentist, that's to the West as look at a map, with a farmstead extension type layout behind the buildings immediately East of the hotel. (DM comment) The nature and purpose of this representation is uncertain and despite having sought clarification upon this northing further has been received from Herefordshire Council.	No change proposed as a consequence of this representation
	Village Policies Map		Policies maps need a key, scale on the same page to be easier to read. The Policies Maps and notations will be replaced by one produced by Herefordshire Council in its house style for the next formal stage as part of the Service Level Agreement.	HC to redraft maps in its House Style
S2 Welsh Water Dwr Cymru (Statutory Consultee)	Whole plan	Support	DCWW are supportive of the aims, objectives and policies set out. Noted	No change proposed as a consequence of this representation
	Policy WG4	Comment	We note there are two proposed allocations are both within the settlement of Whitchurch and both proposed to deliver six units each. Goodrich Wastewater Treatment Works (WwTW) serves part of the Group Parish Council area namely the settlements of Whitchurch and Symonds Yat. There are no issues ns the WwTW accommodating the foul-only flows from two proposed allocations. With regard to providing a supply of clean water and for public sewerage, they are no issues in either network accommodating the two sites though some level of offsite works may be required to connect. Noted with thanks	No change proposed as a consequence of this representation
	Policy WG18	Support	We are particularly welcome this Policy, which will ensure there is sufficient capacity in our infrastructure before new development can connect. Noted with thanks	No change proposed as a consequence of this representation
S4 Historic England (Statutory Consultee)	Whole Plan	Support	Supports both the content of the document and the vision and objectives set out in it. We are pleased to note that the Plan evidence base is well informed by reference to the Herefordshire Historic Environment Record including the Herefordshire Landscape Character Assessment. The emphasis on the conservation of local distinctiveness through good design and the protection of local and national heritage assets including historic parks and gardens, historic farmsteads, archaeological remains and landscape character is to be applauded. Overall the plan reads as a well-considered, concise and fit for purpose document which we consider takes a highly commendable approach to the historic environment of the Parish. Beyond those observations we have no further substantive comments to make on what Historic England considers is a good example of community led planning Noted with thanks	No change proposed as a consequence of this representation
S5	SEA and HRA	Comment	Notes and concurs with the conclusions of the Environmental Report submitted.	See change No 28

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
Natural England (Statutory Consultee)			<p>In relation to the HRA, agree with the conclusion that further assessment is required to establish no likely significant effects on the following designations:</p> <ul style="list-style-type: none"> • River Wye SAC. • Wye Valley and Forest of Dean Bat Sites SAC <p>Natural England notes the proximity of allocated sites in the draft plan to the River Wye SAC, and recommends that further consideration is given to these policies to ensure that impacts on the Wye are avoided.</p> <p>The HRA does not indicate any problems with the site allocations (WG4) although indicates in relation to the settlement boundary policies for Whitchurch and Symonds Yat West (WG3 and WG5) that:</p> <p>'Additional criteria could be added to strengthen the avoidance of locations which could have an adverse impact on the Wye Valley and Forest of Dean Bat Sites SAC. The Lesser Horseshoe Bat is known to travel 5-10km between summer and winter roosts and is vulnerable to disturbance; light pollution; and habitat loss. Development proposals will need to consider woodland habitat buffers and measures to minimise light pollution.'</p> <p>The Plan should be read as a whole and it does not suggest any reduction in the level of protection to SAC sites offered within Herefordshire Local Plan Core Strategy. Measures to minimise light pollution are included in Policy WG8 and this applies to all forms of development, where relevant, and not just housing proposals. A change to refer to woodland tree buffers is proposed to Policy WG15.</p>	
	Policy WG4		<p>Ensure that any allocations on best and most versatile land are justified in line with para 112 of the National Planning Policy Framework</p> <p>Most of the land within or adjacent to Whitchurch is grade 3 and the two sites proposed in the draft NDP fall within this. There are pockets of grade 2 land to the north and west. Land around Symonds Yat West are of lower grades and no doubt reflect their slope.</p>	No change proposed as a consequence of this representation

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
				
	Policy WG7	Suggest change	<p>The neighbourhood plan is an opportunity to commit to the creation of specific enhancements with any development in the plan area, such as native planting, orchard creation, and other specific measures which would enhance biodiversity interest and local amenity. Natural England recommend that a policy could be included with specific requirements for GI to support sustainable development in the plan area.</p> <p>Policy WG7 already seeks the enhancement of natural assets within the Group Parish wherever appropriate. This might usefully be expanded to cover the issue raised.</p>	See Change No 23
	Policy WG8	Suggest change	<p>Given the proximity of the Wye SAC and Wye Valley and Forest of Dean Bat Sites SAC, a commitment to low level lighting should be considered under the heading of “sustainable design”, and we refer you to the guidance produced by the Bat Conservation Trust</p> <p>Policy WG8 already contains a criterion aimed at minimising lighting and although it could be made plain that this would apply to all forms of development.</p>	See Change No 24
S.6 Environment Agency (Statutory Consultee)	Whole Plan	Comment	<p>It is important that these plans offer robust confirmation that development, including camping and caravan proposals, is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period. It should be noted that the Flood Map provides an indication of ‘fluvial’ flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with your drainage team as the Lead Local Flood Authority (LLFA). We note that you have utilised our guidance and pro-forma to inform your draft plan. It would</p>	No change proposed as a consequence of this representation

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			<p>appear that you have listed your allocations (on the submitted pro-forma) as falling within Source Protection Zone (SPZ) 1 which is contrary to our records (both sites are located outside of any SPZ).</p> <p>Comments noted. The advice does not affect the identification of the sites proposed as housing allocations. Herefordshire Council, who is understood to be the LLFA, was consulted on the draft NDP, and has not commented on this matter. Grateful for the advice that all the sites are located outside of SPZ1. This arose from a precautionary interpretation of the broad definition of the areas presented on the Environment Agency's website.</p>	
	Policy WG4	Comment	<p>Welcome consideration of flood risk in the plan and also in consideration of future development throughout the Parish. As confirmed on the submitted Pro Forma the two housing sites are located within Flood Zone 1, the low risk Zone. However, with reference to Policy WG4 (i), the site to the north of Old Court Hotel, whilst located within Flood Zone 1, does abut Flood Zones 2 and may have access/egress through land impacted by flooding. Any application for residential development on the site will need to confirm a safe access route through discussion with Herefordshire Council and their Emergency Planning Team.</p> <p>Comment about development north of Old Court Hotel is noted. As the NDP must be read as a whole, Policy WG17 would be relevant. However, it may be made clear in the justification to the policy that this may be an issue that needs to be considered. See Appendix 1 in relation to land north of Old Court Hotel.</p>	See Appendix 1
	Policy WG9	Suggest change	<p>With regards Policy WG9 we note that land adjacent to the River Wye is allocated to support, or continue to support, 'tourism and visitor facilities and related intensification and regeneration'. The area of land lies wholly within Flood Zone 3, the high-risk Zone based on our Flood Map for Planning, and likely to be partially 3b functional floodplain where only water compatible development is supported (NPPG Table 3, Paragraph 067 refers). We would seek clarification around this Policy and whether new built development in an area of high flood risk is being sought. With reference to NPPG Paragraph 066 camping and caravan sites are classed as 'more vulnerable' or 'highly vulnerable' dependent upon whether it is short-let or permanent residential use. Should the aspiration be to support further development of 'more' and 'highly vulnerable' uses, such as camping and caravan, as part of Policy WG9 we would expect greater consideration of flood risk matters and associated evidence base. Should camping and caravan uses be proposed in this area we would recommend discussions about the evidence base to support such development. In consideration of the above we would expect flood risk to form a key part of this Policy to ensure that any development is safe and will not increase flooding to third party land or properties, taking into account climate change. Development in this area will need to accord with your Policy WG17 (Protection from Flood Risk) and Herefordshire Council's Policy SD3 (Sustainable Water Management). Both Policies reference the Sequential and Exception Tests and Tables 2 and 3 – 'Flood Risk Vulnerability Classification' and 'Flood Zone compatibility' respectively on the NPPG should be considered.</p> <p>Comment noted. The NDP should be read as a whole and Policy WG17 will apply to any proposals within the area covered by Policy WG9. However, given its importance and the Agency's concerns, a change to make this explicit within the policy's justification/supporting statement is proposed.</p>	See Change No25
	Policy WG15	Comment	<p>With regards water quality we would expect, consistent with Herefordshire Councils Policy SD3, development to help conserve and enhance watercourses and riverside habitats.</p>	See Change No 28

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			NDP Policy WG15 would be relevant to this concern although it is recognised that Herefordshire Local Plan Core Strategy Policy SD3 might also be referred to especially as the corridors of the River Wye, Whitchurch Brook and Garron Brook are referred to.	
	Policy WG17	Suggest change	Reference should be made to 'highly' and 'more vulnerable' uses and not solely housing. Advise noted with thanks. It has been pointed out that housing may be appropriate within flood risk zone 2 in certain circumstances and therefore reference simply to the sequential and exception tests would be appropriate.	See Change No 30
S.7 Highways Agency (Statutory Consultee)			No comment received Assumed have no objections to the plan	No change proposed as a consequence of this representation
S.8 Forest of Dean District Council	Whole Plan	No Comment	Thanked for the consultation but no observations to make Noted with thanks	No change proposed as a consequence of this representation
S.9 Coal Authority	Whole Plan	Comment	As you will be aware the Neighbourhood Plan area lies within the current defined coalfield. According to the Coal Authority Development High Risk Area Plans, there are recorded risks from past coal mining activity in the form of 23 mine entries. It is not clear if the Neighbourhood Plan is allocating sites for future development, and the plans included do not help to identify where those sites are, if this is the case. However, if the Neighbourhood Plan is proposing to allocate sites for future development then we would expect consideration to be given to the need for development proposals to respond to, and take account, of these risks in accordance with the National Planning Policy Framework and the Development Plan. In accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended) please continue to consult The Coal Authority on planning matters. <u>Clarification was sought upon this representation which resulted in the following additional comments:</u> You have now provided me with a plan showing two proposed housing sites, one to the north-west of the village off Llangrove Road and one to the west of Old Court Hotel, both shaded brown. I have now had an opportunity to integrate more closely the data we hold for these features and although these are defined as forming a High-Risk Area for past coal mining activity they appear to be associated with the mining of Ironstone and not coal.	No change proposed as a consequence of this representation

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	<p style="text-align: center;">Comment Parish Council Consideration (in blue)</p>	Response to representation
			<p>None of the recorded mine entries are within the area which you have identified for future housing development. For information the mine entries are located within the southern corner of the identified Neighbourhood Plan boundary, within or adjacent to Lord's Wood.</p> <p>I can confirm that the Coal Authority does not require any specific criterion to be included within the Neighbourhood Plan in respect of coal mining legacy issues.</p> <p>Advice is very helpful and noted</p>	
S.11 National Grid	Whole Plan	Comment	<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High-Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area. Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure.</p> <p>Noted with thanks. National Grid was consulted at the Regulation 14 stage resulting in this response. Further consultation upon the NDP at Regulation 16 and upon any subsequent planning applications will be undertaken through Herefordshire Council's processes</p>	No change proposed as a consequence of this representation

Appendix 1

Whitchurch and Ganarew Neighbourhood Development Plan

Representations in relation to Policy WG4(i) - Land and buildings amounting to approximately 0.5 hectares to the west of Old Court Hotel

1. Some 7 representations contain one or more comments upon the proposed allocation of land and buildings amounting to approximately 0.5 hectares for housing to the west of Old Court Hotel. Of these one offers support while the others either object or advance some concerns. The form of development relies upon other policies in the NDP although the supporting statement in paragraph 6.2.4 states:

'The site comprises a number of barns behind a recent complex of converted rural buildings and an additional parcel behind both. Recent housing developments have resulted in the area becoming part of the built-up area of Whitchurch village. The conversion of the principal barn would provide it with a viable use while retaining the character and setting of the area and the Old Court Hotel, in particular. Removal of the more recent steel framed extension and the further land to its rear also lies adjacent to Old Court Hotel although in a location where a sympathetic scheme would be unlikely to adversely affect its setting. A public right of way sits along its northern edge and its extension to the rear of the hotel through the site might produce some public benefit for walkers and the hotel. In combination this site should make a contribution of around 6 dwellings to the required level of proportional housing growth.'

2. A summary of the comments identifies the following issues raised by those making representations:
 - i) The potential adverse effect of development on the Listed Building of Old Court Hotel and the development would not protect or enhance the historic environment, conflicting with policy WG16 and relevant paragraphs in the NPPF.
 - ii) Development in this location would not protect or enhance the natural environment, conflicting with policies WG14 and WG15.
 - iii) Development would adversely affect the road and highway safety as a consequence of the large amount of traffic it would generate, conflicting with policy WG20.
 - iv) Development would not support existing services and facilities or enhance leisure or educational facilities.
 - v) Development would restrict the operation of the Old Court Hotel, affecting its viability as a business and the use of an important Listed Building both in the short and longer term, i.e. during building works and through complaints about noise from its use. This in turn would have an adverse effect on local employment.

- vi) There is no need for the allocation in that the target is likely to be met through other permissions.
- vii) The proposal will not lead to the provision of affordable homes.
- viii) The site is not within but abuts Flood Risk Zone 2. It may have access/egress through land impacted by flooding. Any application for residential development on the site will need to confirm a safe access route through discussion with Herefordshire Council.

3. Effect on the Listed Building:

3.1 The Old Court Hotel is a Grade 2* Listed Building that abuts the site on its western edge. It is the only Listed Building within the site's immediate vicinity that would be affected by the development. Although Herefordshire Council's comments suggest the farm buildings comprise a farmstead, it is not shown as an historic one resulting from its County-wide Historic Farmstead Characterisation project upon the Council's Historic Environment Register. Policy requirements are to assess the significance of the particular heritage asset and then to ensure that the assessment should be taken into account when considering the effects of any proposal upon it to avoid or minimise conflict between the asset and the proposal. In undertaking such an assessment, the following aspects should be considered (NPPF paragraph 126):

- Will the adjacent development affect the ability to sustain and enhance the significance of Old Court Hotel, putting any viable use at risk;
- Will the development create wider social, cultural, economic and environmental benefits that conserving the historic environment can bring;
- Could the development make a positive contribution to local character and distinctiveness.

3.2 Concerns that development adjacent to businesses and facilities might generate noise and therefore complaint are legitimate and guidance within both the NPPF (para 123) and from Herefordshire Council's Environmental Health section highlight this issue. The first specifically advises policies and decisions should:

'recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established.'

- 3.3 The proposal is not advanced as one aimed at conserving the historic environment. Indirect effects may include some improvement to the wider environment through tidying the site and removing a number of steel framed buildings.
- 3.4 Herefordshire Council point to work done in Kent that provides guidance upon additions to farmsteads. Similar guidance has been prepared for farmsteads within the West Midlands Region and, although less detailed, there is a summary specifically for Herefordshire (see Addendum 1). Whitchurch falls within an area where you might expect to see loose courtyard plans with working buildings to 4 sides of the yard. For smaller farmsteads within the hillier landscapes, these are more likely to retain a pattern of smaller-scale enclosure slightly less affected by 18th and 19th century change. The guidance might be used to determine whether an acceptable scheme could be produced through informing a heritage impact assessment. This would have to take into account the setting of the Old Court Hotel.
- 3.5 Conversion of the barn element included within the policy may well be able to proceed independently of the land being proposed for housing within the NDP, in that, if not included within the settlement boundary, it might proceed under Herefordshire Local Plan Core Strategy policy RA5 through a suitably sensitive scheme. Evidence is suggested that planning permission for the building's residential conversion was granted and that some works may have been undertaken to implement that permission.
- 3.6 There are both potential benefits and disadvantages to the historic environment from developing the land adjacent and to the west of the Old Court Hotel.
4. Effect on Landscape Character, the AONB and Features
 - 4.1 In terms of landscape character, the development site is modest in size and would therefore fit sensitively into the landscape character type. It will not have a significant adverse effect on the character of the landscape or setting of the settlement and would therefore conform with policy WG14.
 - 4.2 Given the nature of the surrounding development, much of which is modern, and the fact that the site sits adjacent to the built-up area of the settlement, there will be no significant adverse effect on the beauty and amenity of the Wye Valley AONB. The extent of

development is not such as would be considered 'major development' within the AONB. The removal of the steel framed barns may create a benefit.

4.3 There are few existing landscape features on site and there would be opportunity to improve the landscape features in accordance with policy WG7 and WG14.

5. Highway Capacity and Safety

5.1 Herefordshire Council's Highways section has not objected to the scale or location of development along the road through the Regulation 14 consultation.

5.2 All development will generate additional vehicular traffic wherever it is located. A judgment needs to be made upon whether it will have a significant effect on safety of road users. There is adequate visibility for vehicles and there are many similar locations to this site where development is proposed within the County.

5.3 The developments of 6 additional dwellings in this location might be expected to generate around 33 extra trips per day (normally considered 16 hours and based on 5.5 trips per day for a detached dwelling). Even at a higher rate of 7.5 trips per day which some transport assessments use, this would amount to 45 trips per day. These figures are based upon all vehicles coming and going not just those of residents. It is also worth pointing out that while many of us would imagine most houses might produce 2 vehicles leaving in the morning rush hour, this isn't true of the average. Consequently, the proposed level of development might generate an additional 2 to 3 trips per hour over the course of the day which should be acceptable at this point. This level of additional traffic generated in combination with the nature of the road should not significantly affect the current levels of safety for pedestrians to an unacceptable degree.

5.4 NDP Policy WG21 contains criteria relating to highway requirements for development and there is no indication from the information available that these cannot be met.

5.5 A public right of way runs along the west edge of the site which might be redirected through the development site if it will create some benefits.

6. Effect on Services and Facilities

6.1 The site is well located in relation to the village Primary school and the Old Court Hotel. It is on the opposite side of the A40 to the village shop, village hall and another public house. In this regard there are both positives and negatives.

7. Effect on the operation of The Old Court Hotel

7.1 This issue has already been referred to in 3.2 above in relation to effects upon viability of a use for the Listed Building.

7.2 In terms of effects on the business more generally, it is understood that the Parish Council has expressed concerns about potential complaints from residents of any development as the result of noise arising from the Hotel's use. It is understood that a key element of the Hotel's business is the holding of events such as weddings and utilising its extensive garden for these, including through utilising marquees. The events can extend into the late evening. This may well be a potential cause of nuisance. In view of advice from Herefordshire Council's Environmental Health section, significant weight might be given to this criterion.

8. Housing Need

8.1 The NDP has to show that it has planned positively and with a high degree of certainty that the required level of proportional growth will be met. In addition, the NDP is stronger if it includes site allocations because without these, should Herefordshire Council not have a 5-year housing land supply then the Core Strategy and any NDP gives way to the Government's policies set out in the NPPF. For NDPs with housing allocations, Herefordshire Council must have less than a 3-year housing land supply for the NPPF to take precedence. Herefordshire Council regularly does not have a 5-year land supply and this situation may continue until it is able to provide by-passes for Hereford and/or Leominster. However, it does have a 3-year supply. At such times as the NPPF is the prevailing planning policy, then housing development only has to amount to 'sustainable development', which is very broadly defined, and there would be no 'in principle' limit to housing numbers.

9. Lack of Affordable Homes

- 9.1 There are two ways of providing 'affordable housing'. The first is that it is required where housing developments provide 11 or more houses. The second is through Herefordshire Local Plan Core Strategy Policy H2 - exception sites. The site off Llangrove Road would exceed the threshold should it be combined with the area that already has planning permission. There is the possibility that this might happen given the need to revise the current scheme in order to provide access to the area forming an extension. The exception approach offers an alternative approach for rural communities where large schemes do not come forward and small areas of land that would not normally receive planning permission for housing can be identified.
- 9.2 Large housing sites within the Wye Valley AONB may be considered 'major development' and in such instances planning permission would normally be refused unless there were public benefits and sufficient landscape mitigation. The assessment of sites submitted for consideration within the NDP found that the larger sites where affordable housing would be required all had significant constraints, and this was confirmed by evidence within Herefordshire Council's Strategic Housing Land Availability Assessment. A flexible approach that might enable an acceptable large site to be brought forward and provide an element of affordable housing would appear to be an alternative. Similarly, an approach that would enable self-build dwellings might also meet local needs. The most appropriate sustainable location for these would be close to Whitchurch, given its facilities and services.

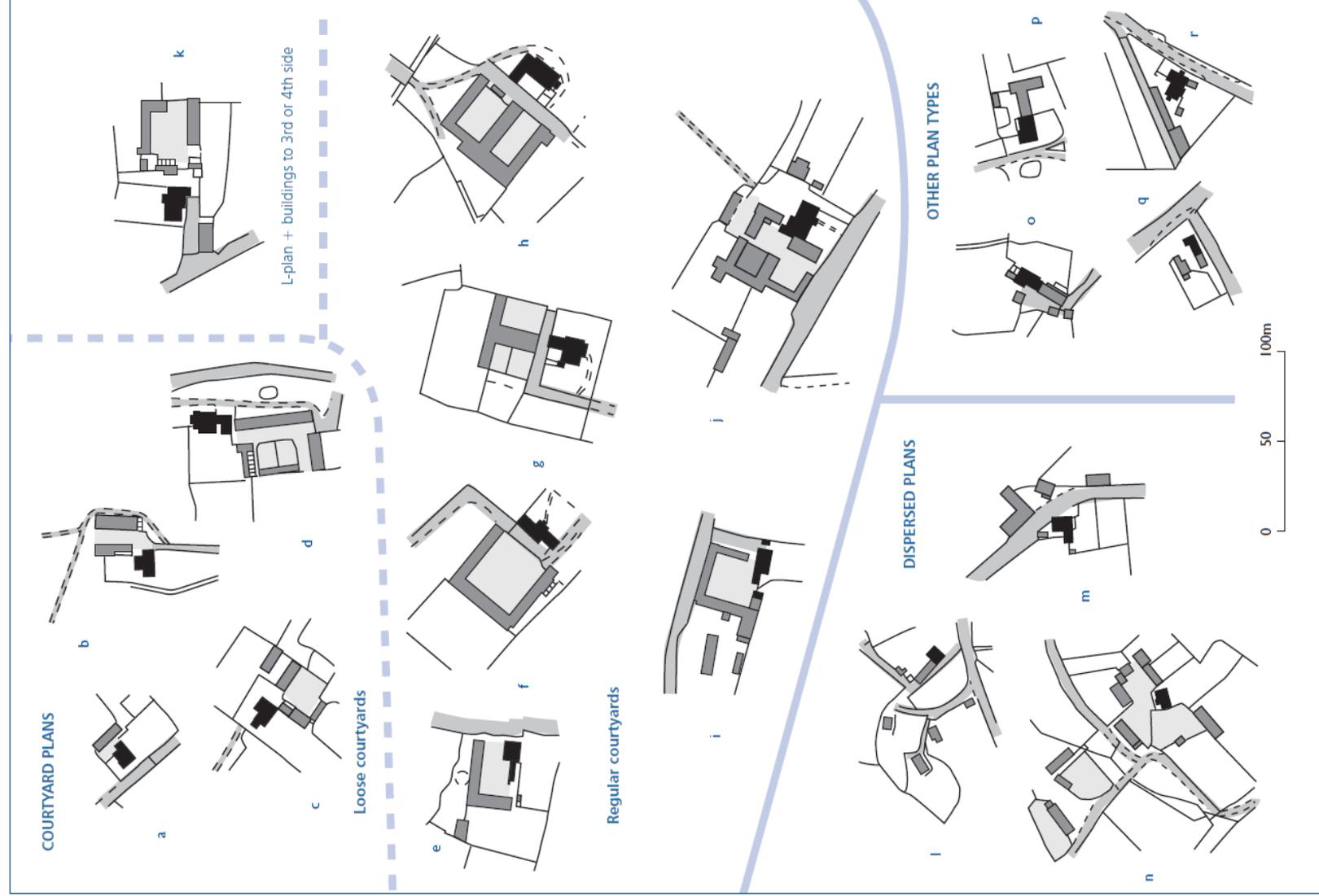
10. Flood Risk

- 10.1 The area that might be developed sits on the opposite side of existing dwellings to the area that falls within Flood Risk Zone 2. The concerns expressed by the Environment Agency appear not to have affected decisions for other development in this location, but they are legitimate and would need to be taken into account. It may affect the level of certainty relating to the site as a whole.

11. Conclusion

- 11.1 Unless there are overriding concerns restricting development, for the purposes of choosing between sites for inclusion as allocations within the neighbourhood plan, the benefits and adverse effects will need to be weighed against each other. In relation to site WG4 (i), in order to enable the site to show that it is able to make a contribution to the required level of proportional growth, there needs to be a high level of certainty that a suitably sensitive scheme can be brought forward in this location.
- 11.2 The potential conflicts expressed in the representations are sufficient to raise concerns about certainty that development of the site is deliverable, especially in relation to any new buildings. The area falls within what would be considered a reasonable settlement boundary in this location. However, the effects upon the Old Court Hotel and with access to the site being across land liable to flooding, there is concern that the undeveloped part (i.e. that not subject to the planning permission for the rural building conversion) may not be developable. As a consequence, it is considered that the undeveloped part of the site should be removed as an allocation and that, should proposals be advanced in terms of self-build dwellings under revised policy WG3, then this would be judged against policies in the NDP reflecting the considerations outlined in the representations. The effect of this would be to reduce the contribution that the area might make to the required level of proportional housing growth to 3 dwellings instead of 6 (i.e. only the barn conversion).

Addendum 1: Extract from West Midlands Farmsteads and Landscape Project – Herefordshire County Summary Report
See below:-



Section 4

Whitchurch and Ganarew Group Parish Neighbourhood Development Plan

Schedule 2: Changes made in response to comments received upon the Regulation 14 Draft Plan and matters arising since the commencement of the consultation period,

October 2018

(NB minor typographical and grammatical changes are not listed)

Whitchurch and Ganarew Neighbourhood Development Plan Changes to Draft Plan Following Regulation 14

Change Ref No	Draft Plan Section/reference	Proposed Change	Reason
1	Plan Title page	Amend to read ' Whitchurch and Ganarew Group Parish Neighbourhood Development Plan 2011–2031 <u>Submission Draft – October 2018</u> '	To indicate the period covered by the plan.
2	Footer	Amend to read: ' <u>Whitchurch and Ganarew Group Parish Neighbourhood Development Plan 2011 - 2031 Submission Draft – October 2018</u> '	To reflect the updated version.
3	Reg 14 Notice	Delete Notice	No longer required – Plan has progressed past this stage.
4	Paragraph 1.1.4	Add to end of paragraph: 'The NDP was made available for the public and other stakeholders to comment upon under Regulation 14 of the Neighbourhood Planning Regulations between 9 th April 2018 and 21 st May 2018.'	To update the paragraph.
5	Paragraph 1.2.2	Amend to read: 'This Neighbourhood Plan has been approved by Whitchurch and Ganarew Group Parish Council.'	To update the paragraph.
6	Paragraph 1.2.3	Amend to read: 'The Steering Group <u>and Parish Council have</u> written these policies with professional support from the Data Orchard and in consultation with Herefordshire Council's Neighbourhood Planning Team.'	To update the paragraph.
7	Paragraph 2.2.1	Amend 4 th sentence to read: 'Much of the Parish is <u>protected by a</u> statutory designation: around 85% is in the Wye Valley Area of Outstanding Natural Beauty (AONB) and around 10% of the total Parish area is designated a Site of Special Scientific Interest (SSSI), comprising the Upper Wye Gorge SSSI, the Great Doward SSSI	To improve clarity.

		the River Wye SSSI.’	
8	Policy WG1	<p>Amend points a) and d) as follows:</p> <p>a) The Neighbourhood Development Plan supports the delivery of <u>a minimum of 65 houses</u> in the neighbourhood plan area over the period 2011-2031 to meet the needs of both the local and wider community through development that contributes to meeting identified needs in respect of size, type and tenure.</p> <p>d) The natural, built and historic environment within the Parish will be <u>conserved</u> and enhanced, and local distinctiveness maintained.</p>	<p>1. To reflect advice from HC.</p> <p>2. To use the correct terminology</p>
9	Policy WG2	<p>Amend first paragraph and points b) and e) as follows:</p> <p>Whitchurch will be the focus for most housing development during the Plan period although Symonds Yat West will receive a <u>proportionate</u> amount of new housing. The level and extent of housing development will meet identified needs in relation to the range of house types and tenures while ensuring this takes place within national and local environmental capacities and other constraints. <u>Sensitive</u> expansion of employment areas providing local job opportunities will be supported. There will be an emphasis on <u>conserving and enhancing</u> the landscape quality, character and beauty of the Wye Valley AONB. There will also be emphasis on protecting high-grade agricultural land. The accommodation of development to meet the needs of the Parish and contribute to County requirements will be based upon the following approach:</p> <p>b) A settlement boundary is defined for Symonds Yat West within which infilling may take place where this is <u>matches the scale and form</u> of the settlement and <u>is</u> designed both to fit sensitively into the landscape and result in the enhancement of the natural and historic environment.</p> <p>e) Increased use of land adjacent to the River Wye to the east of Whitchurch for visitor and tourism facilities will be supported where this is consistent with <u>conserving</u> or enhancing the historic and natural environment, especially the Wye Valley AONB, the River Wye</p>	<p>1. To reflect advice from HC.</p> <p>2. To use the correct terminology</p>

		Special Area of Conservation and designated heritage assets and appropriate protection from flooding is provided. Measures to enhance the area will be supported.	
10	Policy WG3	<p>Amend to reflect only one site is allocated for housing development to one site and add a third paragraph to read:</p> <p>‘Outside of the settlement boundary, but on its edge, housing development in sustainable locations will be supported where, in addition to complying with other policies in this Plan, it comprises one of the following:</p> <p>i) Small plots for self-build dwellings where each initial owner has primary input into the final design and layout;</p> <p>ii) A development of affordable housing sufficient to meet the local needs identified during the plan-period.’</p>	<p>1. To take into account the removal of a site where representations affect certainty.</p> <p>2. To enable housing to come forward to meet local needs</p>
11	Paragraph 6.2.1	<p>Amend to read:</p> <p>‘The settlement boundary includes that previously identified in Herefordshire’s Unitary Development Plan with additions to accommodate recently-developed or approved sites, <u>and a site allocation</u>. It incorporates properties on the east side of the A40 now that development has extended in that direction. The boundary extensions follow physical features, such as buildings, field boundaries or curtilages where possible. In this regard it is considered to follow Herefordshire Council’s advice in its Guidance Note 20. In parts of the settlement boundary, it may be possible for limited infilling to take place provided it can be designed to fit sensitively into the village street-scene and meet several other requirements. <u>This would include the conversion of barns adjacent to the Old Court Hotel which was granted planning permission for three dwellings in 2005 but has yet to be completed although there is evidence that development has commenced</u>. No major constraints have been identified such as Scheduled Ancient Monuments or nationally designated nature conservation sites. An area to be safeguarded for minerals is located to the south-west of properties along the Old Ross Road although the ribbon of development along this route has a well-defined edge in that direction. <u>There is some potential flood risk which would require the provisions of Policy WG17 to be met.</u>’</p>	To reflect changes policy WG3.
12	New paragraph 6.2.3	<p>Add new paragraph to read:</p> <p>‘There are local housing needs that it may not be possible to meet within the settlement boundary or through the allocated site. These include opportunities for local people to undertake self-build</p>	To add the justification for the changes to policy WG3.

		<p>schemes and the provision of affordable housing to meet identified needs. Such sites should be located in sustainable locations on the edge of Whitchurch village defined by its settlement boundary. Whitchurch is the most sustainable location offering reasonable access to a range of services and facilities within the terms of Herefordshire Local Plan Core Strategy policy H2. It may not be possible to find such sites immediately adjoining the boundary, but the sites should, at least, be connected to it by a public footpath. The requirement for the initial owner of a self-build home to have primary input into its final design and layout meets the advice set out in Planning Practice Guidance. With regard to a scheme for affordable housing, this needs to be supported by evidence that there is a local need that will be met through the proposal. This provision complies with Herefordshire Local Plan Core Strategy Policy H2.'</p> <p>Renumber subsequent paragraphs as appropriate</p>	
13	Policy WG4	<p>Change policy to read:</p> <p>'Land amounting to approximately 1.0 hectare adjacent to Yew Tree Close shown on Whitchurch Village Policies Map are allocated for housing development where they comply with policies set out in this plan.'</p>	<p>To reflect the deletion of the site to the north of The Old Court Hotel. (See Appendix 1 to the Schedule of Representations)</p>
14	Paragraph 6.2.4 (Previously para 6.2.3)	<p>Change the paragraph to read:</p> <p>'This site is expected to provide some 10 additional dwellings which reflects the density of dwellings on adjacent sites.'</p>	<p>To reflect the change made to the policy, including the deletion of reference to the Site north of Old Court Hotel and a reassessment of dwellings likely in view of surrounding</p>

			development density.
15	Previous paragraph 6.2.4	NB This paragraph previously referred housing development at north of the Old Court Hotel. Delete paragraph.	The housing allocation on this site has been deleted in view of uncertainty – see Schedule of representations Appendix 1.
16	Paragraph 6.2.5	Amend first three sentences to read: <u>'The allocated site forms part of a larger field, some of which already has planning permission for a further 9 dwellings. Should the whole field be developed it is considered this would amount to major development within the Wye Valley AONB.</u> Amend penultimate sentence to read: <u>'The area is similar in size to the site for 9 dwellings that has planning permission.'</u>	To be more succinct in view of the above changes.
17	Policy WG5	Amend policy to read: <u>'A Settlement boundary is defined for Symonds Yat West. Proportionate housing growth may take place within this boundary that will be restricted to developments which reflect the historic character of development, respects the landscape form and features along the north-east facing valley slopes, and result in enhancements to the environment. The emphasis will be upon maintaining the settlement pattern of the predominant landscape character area. Proposals should:</u> i) <u>Comprise individual dwellings or small terraces close to road frontages that reflect the form and massing found within the settlement with no development in depth or new clustered groups of houses.</u>	To respond positively to helpful representations, including from Herefordshire Council

		<ul style="list-style-type: none"> ii) <u>Utilise obvious infill plots when viewed in relation to the character of the frontage, bearing in mind the density in that particular part of the settlement.</u> iii) <u>Ensure dwellings are of an appropriate size to reflect wayside cottages and dwellings within small holdings.</u> iv) <u>Retain small fields and deciduous woodlands.</u> v) Not result in the loss of the small-scale enclosure pattern. vi) Ensure tree and hedgerow-cover is retained, especially through the use of Tree Preservation Orders in relation to trees. vii) Be capable of being accommodated upon the narrow lane network and not result in the need for them to be widened, although, where appropriate and necessary, providing new or improved passing spaces. <p>The restoration or replacement of existing premises <u>within the settlement boundary</u> will be permitted where this results in an enhancement of the settlement and reflects its historic character.</p>	
18	Paragraph 6.3.3	Add 'woodlands' in the first paragraph.	To respond positively to a representation
19	Paragraph 6.3.4	Amend paragraph to read: 'Any additional dwellings should predominantly be individual where the scale <u>and character</u> of the original settlement would not be compromised. <u>In this regard, infill plots should be obvious with the development reflecting the density of the area within which it is found. The resultant development should not give the impression of being squeezed into gaps that do not reflect the current frontage density, nor utilise wider spaces that form part of the historic pattern of small fields within this important landscape.</u> Clustered groups of new dwellings, as typically proposed by developers, would not be sympathetic to the <u>settlement's</u> landscape character. An emphasis on self-build would complement the traditional form of development within this area.	To respond positively to representations, including from Herefordshire Council
20	Paragraph 6.4.2	Add to end of paragraph:	To add further explanation to the

		'Scope for further developments is however afforded through enabling self-build schemes. A similar modest allowance of 4 more dwellings would appear reasonable through this policy provision. Given the level of uncertainty involved, no provision is included to take into account the possibility that an affordable housing scheme will be advanced.'	assessment of the windfall allowance
21	Table 1	Amend the table to show the following: Number of completions and sites with outstanding planning permissions 2011-2017 – <u>55</u> Land adjacent to Yew Tree Close, Whitchurch – <u>10</u> <u>Windfall allowance, including conversion of barns adjacent to Old Court Hotel (3) and through NDP Policies WG3 and WG5 – 8</u> <u>Rural windfall allowance – 8</u> Planned total during Plan period - <u>81</u>	To update figures in the light of changes to the housing policies and advice on commitments.
22	Policy WG6	Amend policy title and reference in the first sentence of the policy to refer to ' affordable, including intermediate homes/dwellings '	Affordable homes include 'intermediate dwellings'.
23	Policy WG7	Amend criteria d) and e) to read: 'd) Ensuring that new developments do not adversely affect the amenity, privacy or aspects of adjacent properties, are not adversely affected by existing agricultural or commercial activities, or interrupt views and vistas. e) Ensuring that there is no net loss of biodiversity by preserving existing trees, hedgerows, orchards and ponds and should there be any such losses, that they be offset. The natural assets of the Parish should be enhanced whenever appropriate, including, where appropriate, native planting, orchard creation, and other specific measures which would enhance biodiversity interest and local amenity.	To respond positively to representations, including from Herefordshire Council.
24	Paragraph 6.7.2	Add at end of paragraph: 'This Policy applies to all forms of development, where relevant, and not just those for new housing or residential extensions.'	To add clarity
25	Paragraph 7.7.2	Add at end of paragraph:	To add clarity

		'Some of the area falls within the area at risk of flooding and consequently regard will need to be had to NDP policy WG17.'	
26	Policy WG12	Amend policy to read: 'Proposals for home working will be supported where this requires <u>planning permission, including for</u> the erection of an extension to a property, or a new building, or use of an existing building within the curtilage, providing there is no adverse effects on residential amenity, including those resulting from traffic generation, noise or light pollution.'	To add clarity
27	Policy WG14	Amend second sentence to introductory paragraph to read: 'These should be <u>conserved or enhanced</u>.'	To use the correct terminology
28	Policy WG15	Amend policy to read: 'The natural assets of the Parish should be added to where opportunities are available. New development should comply with the requirements of Herefordshire Local Plan Core Strategy Policies SD3 and LD2, and in particular and where appropriate, enhance the biodiversity value of the ecological corridors along the River Wye, Whitchurch Brook and Garron Brook. Other measures to enhance connectivity within the local ecological network will be sought through creating, retaining and enhancing important natural habitats and features such as <u>woodland tree buffers</u>, ancient trees, tree-cover in general, ponds, orchards and hedgerows. There should be no net loss of biodiversity and the loss of any features, where absolutely necessary, shall be offset through full compensatory measures.'	To respond positively to representations, including about riverside habitats
29	Policy WG16	Include at the end of criterion b) ' wherever possible '.	To better reflect national policy
30	Policy WG17	Revise first paragraph to read: New development shall be subject to the flood-risk 'sequential' and 'exception' tests set out in the National Planning Policy Framework. Where development is necessary in areas at risk of flooding, full and effective mitigation measures must be provided. No development will be permitted that will result in increased flood-risk to properties elsewhere.	To better reflect national policy

31	Policy WG20	Refer to ' Highways England '. Add ' cyclists ' to point 5	To refer to the organisation appropriately. To respond to advice from Herefordshire Council
32	Paragraph 9.2.2	Add 'and cycleways' to bullet point 11.	To respond to advice from Herefordshire Council
33	Whitchurch Village Policies Map	Delete housing allocation on land north of Old Court Hotel and amend settlement boundary to reflect outstanding planning permission at Old Court Barns	To reflect changes to policy WG4. See Appendix 1.