

## Goodrich and Welsh Bicknor Group Parish NDP – Examiner’s Questions

1. In the Reg14 version of the Plan para 7.16 refers to the SE corner of the field by the church as being “considered to have a lesser effect upon the view of the Church”. Was this opinion based on a professional assessment from a heritage group or organisation? Or was it an opinion and assessment from the Parish Council and Neighbourhood Planning Group?

An e-mail was sent to the over 100 addresses that had been volunteered to the Steering Group to encourage attendance at a Steering Group meeting on 14 August 2017 - the e-mail and the subsequent minutes of the meeting are attached. A presentation made at the meeting included issues relating to views, landscapes and other issues that impact on site selection for development. This presentation can be viewed in the following document in the link below.

[Presentation of Enviromental and Landscape Issues](#)

on

<https://goodrichneighbourhoodplan.files.wordpress.com/2019/01/display-sites-for-development-criteria.pdf>

Slides 9, 10, 16 and 23 are particularly relevant. (Please note that on slide 22 the mid-blue highly visible in the centre of the slide does not indicate built houses – built houses are shown in a darker blue.) The photograph of the church on slide 14 shows the main approach to the church along the footpath crossing the field from Church Pitch. The SE corner of the field is not on the photograph but off to the right.

Please see also the work undertaken for the Village Design Statement in 2010 in the following document:-

[Village Design Statement 2010](#)

on

<https://goodrichneighbourhoodplan.wordpress.com/village-design-statement-2010-2/>

This view was the opinion of the NDP Group and supported by the Parish Council through approval of the draft NDP. In reaching this view the NDP Group was mindful of the comments of English Heritage on the planning application for the field. English Heritage had left the door ajar to the suggestion that a modified approach could be acceptable in relation to a planning application for development of this site and we felt this should be reflected in our opinion and provide flexibility for appropriate development rather than concentrating on the failed application.

The Planning Officer’s report when turning down the planning application is available as:-

[Land adjacent to St Giles Church Goodrich Herefordshire.](#)

On

[https://www.herefordshire.gov.uk/info/200142/planning\\_services/planning\\_application\\_search/details?id=180929](https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=180929)

2. The Information about the Reg14 consultation and proposed alterations that I can find online (attached) does not state that the boundary of the Church Field Local Green Space (LGS) will be changed from that shown in the Proposals Map for Reg14. However, as I read the Proposals Map in the Submission Version for Reg16 it has changed. Can you please let me know what the correct intention is, and offer an update to the documentation as appropriate.

Many apologies but an earlier draft version of the Schedules of Representations and Changes/Alterations was incorrectly on the website rather than that considered by the Parish Council.

The correct version attached to this document as Appendix 2. The website has now been updated and correct version can be found as:-

[Schedules of representations to reg 14 draft plan may june 2018](#)

on

<https://goodrichneighbourhoodplan.wordpress.com/draft-ndp-for-reg-14-consultation/>

The change is referred to as Changes No 23 and 24 on the Schedule of Changes/Alterations.

3. Please confirm or correct my understanding that there is only one Parish Council for the Goodrich and Welsh Bicknor Group Parish?

It is confirmed that one joint parish council covers both parishes.

4. A suggestion has been made at Reg16 that Policy GWB4 should refer to 'historic farmsteads and estate buildings' in criteria f), what is your view of this particularly with regard to the Historic England project? Is there an accepted list of Buildings of local heritage value not on the national list available from the LPA or other organisation? If not, was any work done on this during the Neighbourhood Plan process?

It is understood that Historic England (HE) promoted the inclusion of a policy for historic farmsteads within Herefordshire Local Plan Core Strategy although this was not considered. HE states in relation to the Historic Farmstead Project in Herefordshire:

*'There needs to be mechanisms for using the evidence base so that there can be material consideration of sites that make a strong contribution to local character in planning, so that future change can work with and capitalise upon this inherited character. The continued relevance of the project will depend upon it being used by professionals, researchers and the public.'*

This can be found at:

<https://historicengland.org.uk/images-books/publications/wm-county-summaries/herefordshire-county/>

The NDP Group did consider buildings of heritage value and this can found in the following Evidence Reports on the website: -

HISTORY OF SETTLEMENTS & BUILDINGS IN GOODRICH & WELSH BICKNOR

<https://goodrichneighbourhoodplan.files.wordpress.com/2017/05/history-of-settlements-buildings-in-goodrich-welsh-bicknor-v-ll3-roz.pdf>

The listed building schedules linked to the Historic England Site on the page below and the NDP policy which is also on that page.

<https://goodrichneighbourhoodplan.wordpress.com/heritage-and-the-built-environment/>

Village Design Statement 2010

<https://goodrichneighbourhoodplan.wordpress.com/village-design-statement-2010-2/>

It should be noted that the policy set out in the NDP is not intended to replace Core Strategy policy RA5 but to complement it, providing the mechanism for historic farmsteads that HE is seeking. It has the benefit of promoting the particular character of the Wye Valley AONB. A list of Historic Farmstead sites extracted from Herefordshire Council's HER is attached at Appendix 1. The characterisation project does not refer to 'estate buildings'.

**5. Policy GWB6: Sustainable Design:** The first paragraph does not read well – would the following meet your intent:

**“Where appropriate, development proposals should include the following design measures:”**

There is grammatical error which would be remedied by either replacing 'to' in the second sentence with 'should'. However, the suggested change is welcome and an improvement upon what was intended.

**6. Policy GWB11: Community Facilities:** The policy is proposed to deal with open space as well as buildings the supporting text suggests, but the actual policy does not specify either community facilities that are buildings or open space. This is too vague for the clarity required by the NPPF, and the policy should include a list of community facilities intended to be the subject of the policy. For buildings this can either name them (school for example) or give a name and street address. For open space, besides being listed in the policy, the space and its boundaries should be shown on the proposals map. I can add the need for proposals map additions as a modification in my report, it does not need to be done during the examination. But I do need a decision on what open space and community buildings to list within the policy.

Community facilities within the village include: Goodrich Primary School, Goodrich Village Hall, St Giles Church and the shop and café at Goodrich Castle.

Open and recreational spaces within the village include, Goodrich Cricket Pitch, Goodrich Tennis Courts, Moors Meadow (also protected under Policy GWB13), Church Field, Pool Ellocks Local Wildlife Site and the Marsh Local Wildlife Site. Also, Coppett Hill Local Nature Reserve.

Local Services within the village include: The Cross Keys and Hostellerie Public Houses.

In the wider parish, recreational activities include canoeing and fishing on the River Wye and local services include, Welsh Bicknor Youth Hostel and camping facilities. At Symonds Yat East there are two hotels, The Saracens Head and The Royal Lodge and teas rooms.

Also, at Symonds Yat East recreational activities include canoeing, including a British Canoeing Club training facility, rock climbing and conducted river trips.

Walking is a popular activity in the parish by both residents and tourists alike.

**7. Policy GWB17: Affordable and Intermediate Homes:** The policy refers to 'adjacent parishes' but does not specify them. For clarity it needs to. Also criteria d) does not currently specify that the person would be a relative of the current resident – but the text assumes this. Please decide if the criteria is to do this, and if so whether the following revised wording meets the purpose:

*“(d) Those with an essential need to support **a close relative** or be supported by a current resident **who is a close relative** within the Group Parish.*

The adjacent parishes are: Whitchurch and Ganarew; Marstow; and Walford (all Herefordshire). English Bicknor; and Ruardean (both Gloucestershire).

The suggested amendment to d) improves on the original wording.

## Appendix 1

### List of Historic Farmsteads within Goodrich and Welsh Bicknor Group Parish (Extracted from Herefordshire Council's Historic Environment Record)

#### Goodrich

##### HER No Historic Farmstead

33597	Bryant's Court Farm
33556	The Thatch on Coppet Hill
33564	Rocklands farm, previously Yaxton
33565	Mainoaks Farm at the foot of Coppet Hill
47846	Hillside Cottage
48260	Well Cottage, Goodrich
48270	Historic Farmstead, Goodrich
48272	Historic Farmstead, Goodrich
47597	New Barn (New Barn Farm)
47848	Cliff Cottage, Goodrich
48259	Chapel Cottage, Goodrich
48269	High View, Goodrich
47595	Rudge's Barn
47598	The Stalls
48271	Historic Farmstead, Goodrich
48266	Bannut Tree, Goodrich
48273	Hentland, Goodrich
47845	Overkerne, Goodrich
48256	Pool Cottage, Goodrich
48254	Woodbine Cottage
836	Newhouse Farm, Goodrich
47594	Poplands Barn
48264	Linden
47735	Stephouse Farm, Goodrich
47847	Quarry Cottage, Goodrich
47844	Bracken Bank, Goodrich
48261	Garden Cottage
47596	Wye Valley Farm (Huntsham Court)
47843	Leesrigg
48255	Wyeside Cottage, Goodrich
48267	Iona
48265	Cider Mill Cottage, Goodrich
48258	Bank View Cottage, Goodrich
48263	Sunnyside
48268	Wyndend, Goodrich
48257	Pool House Lodge, Goodrich
48262	Yew Trees, Goodrich

#### Welsh Bicknor

47599 Courtfield Farm  
47601 The Green  
47600 Baynhams, Welsh Bicknor

# **Goodrich Neighbourhood Development Plan**

## **Schedules of Representations in response to the Reg 14 Draft Plan, May/June 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 J Seal	Whole Plan and Section 8 (Housing)	Objection	<p>Are you aware that the <i>Royal Institution of Chartered Surveyors</i> (RICS) said <i>property buyer demand</i> had fallen for its <i>12th consecutive month</i> in March? Source: <a href="http://www.bbc.co.uk/news/business-43724002">http://www.bbc.co.uk/news/business-43724002</a> - 12th April 2018. You would do well, to warn property developers in our AONB to hold back for the time being from building, before committing to a fast becoming over saturated housing market, and in the process destroy an area of outstanding nature beauty and our way of living. This development plan is unneeded. If demand is falling, how is building new homes going to help? It is better not to suffer misfortune.</p> <p><b>The minimum level of proportional growth has been set through Herefordshire Local Plan Core Strategy for the period 2011 to 2031. This is expected to cover at least one housing property cycle. The production of the NDP enables the community to have a significant say in where new housing might be located, among other planning policies rather than relying upon developers bringing forward sites of less suitable size and locations, or locations being determined by Herefordshire Council through its Site Allocations Development Plan Document.</b></p>	No change proposed
C.2 B and K Bobroff	Whole Plan and Section 8 (Housing)	Comment	<p>We are very impressed with the work carried and reports produced by the Goodrich and Welsh Bicknor Neighbourhood Plan Steering Group. The Steering Group's work has been extremely thorough. Our only comments are to reinforce the need to build affordable housing so as to enable younger families to live in Goodrich and make use of the village's excellent primary school. Affordable housing would also help create more age and cultural diversity.</p> <p><b>Noted with thanks</b></p>	No change proposed
C.3 E A Cliffe	Whole Plan	Comment	<p>I have read this impressive draft NDP and agree with the proposals put forward for development sites in Goodrich and with the type of housing proposed</p> <p><b>Noted with thanks</b></p>	No change proposed
C.4 Mr and Mrs T E Watson	Policy GWB14	Seeks change	<p>Housing in Goodrich - The concept of settlement boundaries is supported in particular the inclusion of Goodrich Cross as an integral component of the village. However, the settlement boundary for Goodrich Cross should incorporate land north and west of Dean Swift Close (referred to in Map 2 as 'Site 3' and 'Site 4'). (see below for reasons why 'Site 3' and 'Site 4' should be allocated for housing in the NDP).</p>	No change proposed

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			<p>An assessment of sites was undertaken and sites 3 and 4 were ranked lower than the chosen sites. The sites allocated exceed the amount of houses required to meet the necessary level of proportional housing growth. There is no need to identify further housing sites at the present time.</p>	
	Policy GWB15	Seeks change	<p>Housing Sites in Goodrich Village - The concept of housing allocations is supported. However, objection is raised to the proposed details of Policy GWB 15. The proposed allocation of land between Dean Swift Close and the A40 (referred to as 'Site 1' on Map 2) is misplaced and inappropriate. This parcel of land adjoins and overlooks the A40(T). The erection of housing of this site would not result in an acceptable living environment for air pollution and noise pollution reasons. The reliance upon mechanical means and landscape to reduce noise levels for occupants of the housing would be ineffective particularly for their garden areas. The most effective mitigation measure is that of distance between housing and the A40(T) which rules out 'Site 1' entirely. In addition, the allocation of Site 1 would have serious landscape/visual implications. Further, for similar reasons, the allocation of 'Site 2' for 15 dwellings is an overestimate. With the implementation of a required substantial noise barrier between the new housing and the A40(T) the capacity of 'Site 2' would be greatly reduced. The omission of Site 1 and reduced allocation on Site 2 will result in a shortfall in housing to be found under Policy GWB15. This shortfall could and should be met with the allocation of land north of Dean Swift Close ('Site 3' on Map 2). Site 3 is ranked fifth most favoured site in the NDP. It is preferable to develop Site 3 over Site 11 (north of Goodrich Cruse) as its effect upon the AONB would be less and it would be better served by public transport and access. Similarly, the development of 'Site 4' would be preferable to Site 11 for the same reasons. Indeed, the development of 'Site 3' and 'Site 4' would necessarily involve substantial landscaping schemes which would enhance the northern and western flanks of the Dean Swift Close estate which is highly incongruous with the valued landscape.</p> <p>Identifying suitable sites within the Parish and AONB is such that there will always be compromise given both national and local constraints. The choice requires an evaluation based on balancing different and often incompatible criteria. The factors considered were agreed by the Parish Council taking into account consultation responses from the local community. Sites 3 and 4 would suffer from the same noise effects as sites 1 and 2 but with further disadvantages in terms of adverse landscape impact, especially upon the special qualities of the AONB. They also comprise high grade agricultural land in use for that purpose. Dean Swift Close represents a design representative of its time which now blends in and is inconspicuous in the landscape when seen from local viewpoints.</p>	No change proposed
	Policy GWB16	Objection	<p>is objected to as it fails to reflect current national planning policy and guidance on the provision of affordable housing. Schemes of ten or fewer houses are not required to provide affordable housing under national guidance and current Ministerial Guidance. Policy GWB16 should be worded as to be subject to this national guidance.</p> <p>The advice is welcome and appropriate changes to the policy and its supporting statement are proposed.</p>	See changes No 29 and 30

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C.5 M and N Smith	Policy GWB13, paragraph 7.6 and Map 2	Objection/seek change	<p>Object to the exclusion of the lower part of the field from the green-shaded area in Map 2, meaning it is not classified as an area of 'Open Green Space'. The reason given in para 7.6 is self-contradictory. On the one hand the paragraph quite rightly praises the view of the Church offered from Church Pitch, and then goes on to say that the excluded section is considered to have a lesser effect on the view. This is patently wrong – any development allowed in the lower part of the field would partially or completely obliterate the view of the church from Church Pitch, an iconic view that is enjoyed by locals and visitors as one of the defining aspects in the village. (It is also incorrect to say that this portion of the field is not visible from Coppett Hill or the other 'Important Views'. The whole field is clearly visible and any development in any part will have a negative effect). For this reason, we would like to see the entire field classified as 'open green space' in Map 2 and the section highlighted In red above removed from paragraph 7.6.</p> <p><b>The area proposed as Local Green Space has been defined following an assessment of the refusal of planning permission on part of the site which is excluded from the Local Green Space definition by Herefordshire Council in October 2017 on the basis that it would not protect or conserve the setting of the Grade 2* Listed St Giles Church; the adverse effects on natural, historic and scenic qualities of the site; and the adverse effects on the wider landscape context of the site. However, it was noted that the harm from development in relation to the Church was considered less than substantial; Historic England indicate that 'further understanding of the contribution of setting to significance is needed in order to confidently discount substantial harm'; and that the planning officer recognised there may be some benefits to the development although these did not outweigh the harm from the specific proposal. This has resulted in there being a level of uncertainty about whether a suitable proposal might be possible on that part of the site that is excluded from the Local Green Space definition. It is therefore considered that the issue of development upon the site should be determined in relation to the effect on the setting of the Church and the wider scenic qualities rather than the designation of the site as Local Green Space.</b></p>	See Change 24
	Whole Plan	Comment	<p>In general, with the exception of the point raised above, we are fine with the NDP and are impressed by the diligence and hard work that has gone in to preparing it.</p> <p><b>Noted with thanks</b></p>	No change proposed
C.6 J Stahl	Policy GWB13 and paragraph 7.6	Objection/seek change	<p>ALL of Church Field should be designated as Local Green Space. This piece of land has been identified previously in the Village Design Statement as sensitive to further development. Its importance to the setting of the Church, and more generally to this part of the village was noted in the recent refusal to grant permission for housing development on it. It should be protected as open space – the view of the Church from Church Pitch is over this piece of land, and it also provides a view from the Church over a cluster of Heritage and Listed properties which has been enjoyed – largely unchanged - by Parishioners and Churchgoers for centuries.</p>	See change No 24

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			<p>The area proposed as Local Green Space has been defined following an assessment of the refusal of planning permission on part of the site which is excluded from the Local Green Space definition by Herefordshire Council in October 2017 on the basis that it would not protect or conserve the setting of the Grade 2* Listed St Giles Church; the adverse effects on natural, historic and scenic qualities of the site; and the adverse effects on the wider landscape context of the site. However, it was noted that the harm from development in relation to the Church was considered less than substantial; Historic England indicate that 'further understanding of the contribution of setting to significance is needed in order to confidently discount substantial harm'; and that the planning officer recognised there may be some benefits to the development although these did not outweigh the harm from the specific proposal. This has resulted in there being a level of uncertainty about whether a suitable proposal might be possible on that part of the site that is excluded from the Local Green Space definition. It is therefore considered that the issue of development upon the site should be determined in relation to the effect on the setting of the Church and the wider scenic qualities rather than the designation of the site as Local Green Space.</p>	
	Whole Plan	Comment	<p>Other than the above, no comments. Thank you for all your hard work on behalf of local residents.</p> <p><b>Noted with thanks</b></p>	No change proposed
C.7 A Brooks Thornett	Policy GWB2	Comment	<p>'Development elsewhere' – should also consider the village as 'a one' and not make specific areas within the village 'more developed/urban' or 'less developed/rural' by adding or not adding development to specific areas. Areas that are already well developed should not be developed further as this is not in keeping with the characteristics of a happy and sustainable rural community.</p> <p><b>The reference to development 'elsewhere' relates to the definition of 'major development' as indicated in para 16 of the NPPF. A change is proposed to replace this with 'outside of the AONB' which is more appropriate to the policy. The parish is required to accommodate a certain amount of development and the intention of the proposed housing allocations is to link the community more closely together. The suggested levels of housing on each site are relatively low and reflect the overall development density of the village.</b></p>	No change proposed
	Policy GWB15	Comment	<p>The development of an extra 30 houses in the Dean Swift/Nutshell/Goodrich Cross area seems rather bizarre and unmerited in terms of the villages current demographics. Comparatively to the rest of the village, this area already has the highest density of housing considerably. What's more the traffic is also very high and in recent years there having been traffic collisions here and a considerable issue with road safety and parking, particularly when the Cross Keys Pub is busy. It seems rather unjust, that the area of the village with by far the lowest average age and a considerable number of whom are children will be subject to further housing development and thus more traffic. In the safety interest of young children, I would like to think that if these proposed areas were built upon, that the housing proposed would be the last</p>	No change proposed

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			<p>development this area of the village for a considerable number of years. What is more, that there would be minimal provision for parking and car usage and an encouragement to use public transport. Alike to my point stated for policy GWB2, this is ONE rural village and building more housing in the area of the village that already has the highest housing density created a very divided and unbalanced village.</p> <p><b>The aim is to seek a range of house types and sizes (see Policy GWB16) to provide for a range of needs and to draw the various parts of the village closer together. The sites are well located in relation to public transport and have access onto adequate roads compared to many of the lanes in other parts of the village. It is not possible to phase development without good reason such as infrastructure constraints. Adequate car parking needs to be provided or this will lead to indiscriminate parking to the disadvantage of road safety and residential amenity. It should be noted that development elsewhere within other parts of the village have resulted in around 18 dwellings since 2011.</b></p>	
C.8 B Thornett	Paragraphs 4.2 & 8.2	Comment	<p>I believe promoting residential development of modest, sustainable scale &amp; proportion that meets the need of the Goodrich &amp; Welsh Bicknor NDP consultation questionnaire outcome &amp; the community strategy will appeal &amp; attract to 1<sup>st</sup> time buyers &amp; the underrepresented group 22-45 (19%) of the community. This would assist in achieving the <b>vision</b> of the Neighbourhood development plan whilst promoting growth &amp; sustainability in a village which I believe is declining due to the high percentage of elderly residents. Further proof being the recent closure of the village shop.</p> <p><b>Noted</b></p>	No change proposed
	Paragraphs 4.3 & 8.3		<p>Small sustainable developments should be of equal distribution between the three identified sites. Further expansion of development outside of these identified sites at Goodrich Cross/Dean Swift close settlement should be prohibited. Expansion into highly fertile agricultural land is unjustifiable when there are further options available for growth within cruise &amp; church areas which would not require the “change of use” application.</p> <p><b>The three sites are of different sizes although may be constrained by the need to safeguard amenity and protect the landscape of the AONB. Once the NDP is adopted, development outside of settlement boundaries would normally be limited to certain exceptions and you would not expect to see general housing provision. The requirements in relation to agricultural land have been considered in choosing sites and will continue to be a material consideration for planning applications.</b></p>	No change proposed
	Paragraph 6.5		<p>In order to ensure the safety of pedestrians, cyclists &amp; increased traffic volume the road infrastructure around Goodrich Cross requires addressing prior to any residential development is agreed. The road &amp; junction markings have worn away especially at the junctions around the Cross keys public inn. There have been many near miss collisions particularly in this</p>	No change proposed

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			<p>area due to people not familiar with the road network &amp; local members of our community cutting corners, not giving way &amp; driving in excess of a safe speed for this road.</p> <p><b>The requirements for development to be served by safe accesses is provided through Policy GWB9. Policy GWB8 also requires developers to address and mitigate any problems arising from their development. This might include traffic management measures listed in para 6.5 bullet 2.</b></p>	
	Policy GWB15		<p>I consider sites 1&amp;2 are best suited to effective &amp; efficient development which will complement neighbouring building in terms of scale, layout, access to road network &amp; appeal to first time buyers. However, the concentration of development should be evenly spread between sites 1,2&amp;6 whilst remaining sympathetic to the size of the present settlement at Dean Swift close. Any more than 20 additional houses in total across sites 1&amp;2 would increase the settlement by over 50% which is unnecessary &amp; unfavourable to the settlement, ref 8:11 Housing targets; 17 further houses by 2031. Any further development should be avoided.</p> <p><b>The three sites are of different sizes although may be constrained by the need to safeguard amenity and protect the landscape of the AONB. The anticipated number of houses across sites a) and b) are 21 although this may vary. The level of growth should be seen within the context of growth that has already taken place elsewhere within other parts of the village where around 18 dwellings have come forward since 2011.</b></p>	No change proposed
C.9 J Prime	Policy GWB4	Seeks change	<p>Lists 4 Scheduled Ancient Monuments which need to be protected from adverse development but omits St Giles' Church which is listed in Appendix 1 as a Scheduled Ancient Monument. The Church should be added to the list of Scheduled Ancient Monuments to be protected in Paragraph GWB4a</p> <p><b>According to information provided by Herefordshire Council within its Strategic Environmental Assessment Scoping Report, St Giles Church is not a Scheduled Ancient Monument although it is a Grade 2* Listed Building. The error is in Appendix 1, which should be corrected.</b></p>	Minor correction made
	Policy GWB13	Seeks change	<p>The policy is entitled Moors Meadow Local Green Space, but the policy deals with Moors Meadow and Church Field. The Policy Should be re-titled Moors Meadow and Church Field Local Green Spaces.</p> <p><b>Grateful for pointing out this error</b></p>	See change No 23
		Seeks change	<p>Policy refers to land immediately to the south-west of St Giles Church but paragraph 7.6 talks about "The area of open undeveloped space to the south-east of St. Giles Church". It should be made clear that policy GWB13b refers to ALL of</p>	

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	Policy GWB13b		Church Field (the land enclosed by the Churchyard, The Old Vicarage, Upper Granton and the more recent properties to the West).  <b>Grateful for pointing out the error.</b>	See change No 24
	Para 7.6	Seeks change	<p><b>The area proposed as Local Green Space has been defined following an assessment of the refusal of planning permission on part of the site which is excluded from the Local Green Space definition by Herefordshire Council in October 2017 on the basis that it would not protect or conserve the setting of the Grade 2* Listed St Giles Church; the adverse effects on natural, historic and scenic qualities of the site; and the adverse effects on the wider landscape context of the site. However, it was noted that the harm from development in relation to the Church was considered less than substantial; Historic England indicate that ‘further understanding of the contribution of setting to significance is needed in order to confidently discount substantial harm’; and that the planning officer recognised there may be some benefits to the development although these did not outweigh the harm from the specific proposal. This has resulted in there being a level of uncertainty about whether a suitable proposal might be possible on that part of the site that is excluded from the Local Green Space definition. It is therefore considered that the issue of development upon the site should be determined in relation to the effect on the setting of the Church and the wider scenic qualities rather than the designation of the site as Local Green Space.</b></p> <p>When referring to Church Field, it states that “Not all the current open area is included in that the part excluded is considered to have a lesser effect upon the view of the Church.” There is no justification for this argument. All of the current area of open space should be designated as Local Green Space. The statement that “it is considered to have a lesser effect on the view of the church” is not true, as can be seen from the image below. The reason for refusing a recent planning application in the land referred to the need to “conserve [and] enhance the natural, historic and scenic qualities of the immediate and wider landscape context of the site” and the “spatial qualities of the site and its positive contribution to the setting of this part of Goodrich, which lies within the Wye Valley Area of Outstanding Natural Beauty”. It is, therefore, perverse that the very piece of land which is clearly considered in need of protection by the Planning Authority, is the area which has been NOT been included in the green space designation in the Plan. Given the previously quoted remarks from the Planning Authority, to designate this land as Local Green Space would also be consistent with the plan’s Policy GWB14e which states that development should not result in the loss of “green spaces that contribute to the unique character of the village” The land which the plan regards as not worthy of protection is currently the subject of a renewed planning application, and I have pasted below a representation of the impact which the current proposals will have on the view of the Church as currently seen from Church Pitch. Such potential destruction of this accessible and much</p>	No change proposed

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loved view of the Church (and, indeed the view FROM the Church over a number of Heritage assets) cannot be justified, and should be prevented by designating this area as local green space. The previous village design statement (referred to in Appendix A3) noted that “The church is complemented by the designated protected area of open space to its south-east and defines the style and charm of the village” and that “The area is ... extremely sensitive to further development.”

All of Church Field should be designated as Local Green Space.



The area proposed as Local Green Space has been defined following an assessment of the refusal of planning permission on part of the site which is excluded from the Local Green Space definition by Herefordshire Council in October 2017 on the basis that it would not protect or conserve the setting of the Grade 2\* Listed St Giles Church; the adverse effects on natural, historic and scenic qualities of the site; and the adverse effects on the wider landscape context of the site. However, it was noted that the harm from development in relation to the Church was considered less than substantial; Historic England indicate that ‘further understanding of the contribution of setting to significance is needed in order to confidently discount substantial harm’; and that the planning officer recognised there may be some benefits to the development although these did not outweigh the harm from the specific proposal. This has resulted in there being a level of uncertainty about whether a suitable proposal might be possible on that part of the site that is excluded from the Local Green Space definition. It is therefore considered that the issue of development upon the site should be determined in relation to the effect on the setting of the Church and the wider scenic qualities rather than the designation of the site as Local Green Space.

Policy  
GWB14d

Seeks change

States that housing development will be permitted where it “does not adversely affect heritage assets within the village, including their settings. It should pay particular regard to the setting of Goodrich Castle.” The final sentence should be extended to say, “It should pay particular regard to the settings of Goodrich Castle and all of the Scheduled Ancient Monument listed in Appendix 1”.

No change  
proposed

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			<b>The sites and settings of Goodrich Castle and other Scheduled Ancient Monuments is protected through Policy GWB4. The plan should be read as a whole and there is no need to include protection of such assets in all relevant policies.</b>	
	Whole Plan	Comment	Whilst I have made some strong observations above, this is clearly a high-quality document which has been the subject of a lot of hard work and commitment – my thanks and congratulations to the NDP team.  <b>Noted with thanks</b>	No change proposed
C.10 P Smith	Policy GWB14: Housing in Goodrich		The approach of settlement boundaries is supported in principle particularly as it includes land at Goodrich Cross which is as an integral component of the village. However, the settlement boundary for Goodrich Cross should also incorporate land north and west of Dean Swift Close (referred to in Map 2 of the NDP as 'Site 3' and 'Site 4'). (see below for reasons why 'Site 3' and 'Site 4' should be allocated for housing in the NDP). <b>An assessment of sites was undertaken and sites 3 and 4 were ranked lower than the chosen sites. The sites allocated exceed the amount of houses required to meet the necessary level of proportional housing growth. There is no need to identify further housing sites at the present time.</b>	No change proposed
	Policy GWB15: Housing Sites in Goodrich Village		The concept of housing allocations is supported. However, objection is raised to the proposed sites of Policy GWB 15. The proposed allocation of land between Dean Swift Close and the A40 (referred to as 'Site 1' on Map 2) is misplaced and inappropriate. This parcel of land adjoins and overlooks the A40(T). The erection of housing of this site would not result in an acceptable living environment for air pollution and noise pollution reasons. The reliance upon mechanical means and additional landscaping on site to reduce noise levels for occupants of the housing would be ineffective particularly for their garden areas. The most effective mitigation means is ensuring distance between noise generators (in this instance the A40(T)) and noise sensitive development such as housing. This rules out 'Site 1' as a housing site entirely. In addition, the allocation of Site 1 would have serious landscape and visual implications. Therefore, Site 1 is neither 'suitable' nor 'deliverable' as a housing site. Further, for similar reasons, the allocation of 'Site 2' for 15 dwellings is an overestimate. With the implementation of a required substantial noise barrier and separation distance between the new housing and the A40(T) corridor, the capacity of 'Site 2' would be much less than 15 houses. Therefore, it is very doubtful that the proposal to locate 15 houses on Site 2 would be suitable and deliverable. The omission of Site 1 and reduced allocation on Site 2 will result in a shortfall in housing to be found under Policy GWB15. This shortfall could and should be met with the allocation of land north of Dean Swift Close ('Site 3' on Map 2). Site 3 is ranked fifth most favoured of the potential housing sites in the NDP. It is preferable to develop Site 3 over Site 11 (north of Goodrich Cruse) as its effect upon the AONB would be less and it would be better served by public transport. Similarly, the development of 'Site 4' would be preferable to Site 11 for the same reasons. Indeed, the development of 'Site 3' and 'Site 4' would necessarily involve substantial landscaping schemes which would enhance the northern and western flanks of the Dean Swift Close estate which is a highly incongruous elevated concentration of development within a valued landscape. No alternative site under Policy GWB15 would achieve these desired effects.	No change proposed

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			<p>Identifying suitable sites within the Parish and AONB is such that there will always be compromise given both national and local constraints. The choice requires an evaluation based on balancing different and often incompatible criteria. The factors considered were agreed by the Parish Council taking into account consultation responses from the local community. Sites 3 and 4 would suffer from the same noise effects as sites 1 and 2 but with further disadvantages in terms of adverse landscape impact, especially upon the special qualities of the AONB. They also comprise high grade agricultural land in use for that purpose.</p>	
	Policy GWB16		<p>Objection is raised to this policy as it fails to reflect current national planning policy and guidance on the provision of affordable housing. Schemes of ten or fewer houses are not required to provide affordable housing under national guidance and current Ministerial Guidance. Policy GWB16 should be worded accordingly. Given this, the advantage given to 'Site 1' under paragraph A4.6, that it would provide affordable housing, is not realisable. Therefore, in this respect Site 1 should be considered no more favourably than 'Site 3' or 'Site 4'.</p> <p><b>The advice is welcome and appropriate changes to the policy and its supporting statement are proposed.</b></p>	See change No 29

## 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		Overall a well-structured and written plan, with locally specific policies to help protect and enhance the parish. In terms of archaeology in general this is a good plan with extensive historic environment coverage and suitable policy provision.  <b>Noted</b>	No change proposed
	Paragraph 2.25		typos in relation to Principal x 2  <b>Grateful for advice</b>	Minor correction made
	Paragraph 3.11		Typo – Symonds Yat East  <b>Grateful for advice</b>	Minor correction made
	GWB1		In general conformity with Herefordshire Local Plan Core Strategy. Refer to active travel - point C <b>Conformity noted. The reference to sustainable travel encompasses ‘active travel’ and it is felt unnecessary to be that specific. Policy GWB6 b) is more specific; GWB6 c) might usefully be amended to refer to ‘active travel’, and ‘active travel’ inserted into Policy GWB8.</b>	See changes Nos 16 and 18
	GWB2		In general conformity with Herefordshire Local Plan Core Strategy. Policy states development should not harm the character or scenic beauty –NPPF and CS go further and suggests development should conserve and enhance the landscape, as it is AONB, I would recommend that the policy uses the same wording.	See change No 13

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			<p>· The policy states major development should be refused unless no viable alternative sites can be found – this exception is not set out within paragraph 116 of NPPF and weakens the policy and should therefore be omitted.</p> <p>· In the policy it mentions taking into consideration a number of factors to determine if the development is major, settlement pattern should be referenced, and this relates to the landscape character type. The LCA for each type defines its settlement pattern.</p> <p>I note the important views from Coppett Hill looking down upon the village there also important views within the village e.g. the approach to the church along the PROW.</p> <p><b>Conformity noted. The policy should be read in its entirety and the second sentence makes it clear that these two factors and others should be enhanced as well as preserved. The NPPF section uses a range of terms including conserve, protect, preserve, restore, minimise, recreate and prevent variously into the range of environmental factors covered by this policy that seeks to address elements of the whole landscape rather than just its character and scenic beauty. The NPPF provision refers to cost of and scope which has been taken to mean viability. However, in order to ensure consistency and to include reference to this being outside of the designated area, which has been omitted, a change is proposed. The concern may also be addressed through explaining the exceptions in greater detail within the supporting statement. The use of ‘and’ ensures that all the criteria need to be met. The LCA does define settlement pattern but in very general terms. Para 2.28 quotes from the LCA in relation to the landscape type within which Goodrich village falls. In relation to the final point there will be other views but those referred to are considered to be of more than local significance.</b></p>	
	GWB3		<p>In general conformity with Herefordshire Local Plan Core Strategy</p> <p><b>Noted</b></p>	No change proposed
	GWB4		<p>In general conformity with Herefordshire Local Plan Core Strategy</p> <p><b>Noted</b></p>	No change proposed
	GWB5		<p>In general conformity with Herefordshire Local Plan Core Strategy. New development should also have regard to the <i>Strategic Flood Risk Assessment (SFRA)</i> for Herefordshire (2009).</p>	No change proposed

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			<b>Conformity noted. The Environment Agency has advised that the Strategic Flood Risk Assessment (2009) does not cover the rural parishes.</b>	
	GWB6		In general conformity with Herefordshire Local Plan Core Strategy. In point b after pedestrians add wording "and cyclist" after suitable for all users add in Reducing reliance on the use of private cars.	See change No 16
			<b>Conformity noted and change in relation to 'cyclist' proposed.</b>	
	GWB7		In general conformity with Herefordshire Local Plan Core Strategy <b>Noted</b>	No change proposed
	GWB8		In general conformity with Herefordshire Local Plan Core Strategy. The wording "encourage sustainable transport" should be included in the policy below. After the word address add 'in and mitigate'	See change No 18
			<b>Conformity noted. There is some uncertainty about what is suggested but changes are proposed to the final paragraph in the policy that it is hoped cover the concerns.</b>	
	GWB9		In general conformity with Herefordshire Local Plan Core Strategy. Remove the specific details of number of parking spaces. Words should include "Parking should meet current HC standard". Therefore, if the parking standards change they can still be held to the requirements. Parking should also include secure, covered and individual to the property cycle storage.  <b>Conformity noted. Parking requirements should take into account the increased level of car use in rural areas, the absence of regular public transport and cycleways, and the need to provide for visitors. The requirement for at least two parking spaces per dwelling ensures that parking is provided for residents and visitors. However, it is noted that the policy could be improved to distinguish between parking for dwellings and parking for other land uses which might usefully be in accordance with Herefordshire Council's standards. The requirement to provide cycle storage is covered by Policy GWB6.</b>	See change No 19
	GWB10		In general conformity with Herefordshire Local Plan Core Strategy  <b>Noted</b>	No change proposed
	GWB11		In general conformity with Herefordshire Local Plan Core Strategy. If there are specific community facilities you wish to safeguard, I would name these within this policy. Minor suggestion on final sentence for clarity:	See change No 21

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			<p>...unless it is clear <u>and demonstrable</u> that the service or facility concerned is no longer viable <u>or required</u>.</p> <p>D- earlier in the doc you have used the wording "sustainable transport" this should really be either one or the other for continuity. Including cycle storage and facilities for cyclist e.g. showers and lockers.</p> <p><b>Conformity noted. The suggested amendments are helpful. Changes are proposed elsewhere to replace sustainable transport to 'active travel' in order to be consistent although it is felt that the former should be used for the strategic policy GWB1 to encompass a wider range of transport initiatives. The requirement for cycle parking to be provided is covered through Policy GWB6. There is some concern whether planning policy can require showers and lockers to be provided, and whether this would be appropriate for community facilities within rural communities and hence the reference to encouraging active travel is considered sufficient.</b></p>	
	GWB12		In general conformity with Herefordshire Local Plan Core Strategy <b>Noted</b>	No change proposed
	GWB13		In general conformity with Herefordshire Local Plan Core Strategy. At the approach to the church a section of the field has been omitted from the green space – why?	See change 24
			<b>Conformity noted. It is recognised that planning permission on part of the site which is excluded from the Local Green Space definition was refused by Herefordshire Council in October 2017 on the basis that it would not protect or conserve the setting of the Grade 2* Listed St Giles Church; the adverse effects on natural, historic and scenic qualities of the site; and the adverse effects on the wider landscape context of the site. However, it was noted that the harm from development in relation to the Church was considered less than substantial; Historic England indicate that 'further understanding of the contribution of setting to significance is needed in order to confidently discount substantial harm'; and that the planning officer recognised there may be some benefits to the development although these did not outweigh the harm from the specific proposal. This has resulted in there being a level of uncertainty about whether a suitable proposal might be possible on that part of the site that is excluded from the Local Green Space definition. It is therefore considered that the issue of development upon the site should be determined in relation to the effect on the setting of the Church and the wider scenic qualities rather than the designation of the site as Local Green Space.</b>	
	GWB14		In general conformity with Herefordshire Local Plan Core Strategy. Reword 'will primarily be restricted to sensitive infilling within settlement boundaries and on sites identified for development'. Restrictive is quite negative, I would replace this with 'sensitive infilling within settlement boundaries and on sites identified for development will be <i>supported/permitted</i> .	See change No 25

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			<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. These comments are provided on the basis that any other developments would be subject to application through the normal planning process. Q- Include provision for cycle parking. Vehicle and pedestrian accesses should be supported by a 7-day speed survey (undertaken during term time) with the visibility splays meeting the 85th%ile of the road.</p> <p><b>Conformity noted. The suggested change to the first part of the policy is accepted. Requirements in relation to contaminated land are covered in Policy GWB6 as are requirements in relation to cycle parking. The suggestion in relation to requiring speed surveys is one of supporting information and not planning policy to determine whether development should be permitted. The supporting information may vary according to the development proposed.</b></p>	
GWB15			<p>Conformity uncertain. Whilst the criteria set for development proposals by GWB14 are in conformity with the Core Strategy, there are concerns over the allocation of these sites.</p> <p>See the sense in seeking to allocate Land opposite Dean Swift Close and Land comprising the former Nutshell Caravan Park although:</p> <ol style="list-style-type: none"> <li>1. The 2012 Strategic Housing Land Availability Assessment (SHLAA) identified significant constraints to development of the caravan park (HLAA/252/001) and land between the A40 and Dean Swift Close (HLAA/252/003). Both sites were considered to be severed from the main village by the A40 and would not be easy to integrate with existing development.</li> <li>2. Road noise is considered a major constraint. For sites a) and b) the impact of noise from the busy A40, is likely to impact the viability of bringing the site forward and hence deliverability. These difficulties would need to be overcome by development proposals. It is noted that land North of Goodrich Manor now has outline permission for 9 dwellings. If</li> </ol>	See change No27

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			<p>noise levels are considered to be acceptable for development, mitigation measures should be included within this policy to ensure the noise levels are minimised as much as possible.</p>	
			<p>3. Would therefore strongly advice that the following more detailed work be commissioned to inform the policy and avoid poor allocations-</p> <ul style="list-style-type: none"> <li>a) A road traffic noise assessment of both sites to investigate &amp; establish the degree of road traffic noise, then how it can be mitigated (if indeed it can). We would then be able to establish the landscape impact of such works;</li> <li>b) An Air Quality Assessment;</li> <li>c) A Highway Consultant to detail how a safe vehicular means of access can be created to both sites.</li> </ul>	
			<p>4. Essential that the following be consulted:-</p> <ul style="list-style-type: none"> <li>a) Highways</li> <li>b) EHO (Noise) – to avoid a fundamental issue being identified or a very high (30m) acoustic barrier</li> <li>c) EHO Air quality</li> <li>d) Landscape</li> <li>f) Trees</li> </ul>	
			<p>5. Site c) in Policy GWB15 actually has planning permission now for 9 dwellings! Best described as north-east (not north) of Goodrich Manor.  <a href="https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=163251&amp;search=bivia">https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=163251&amp;search=bivia</a></p>	
			<p>6. From an ecological perspective the various sites considered suitable. No objection as there is no priority habitat or designations on those sites. 3 sites are deemed unsuitable and I would specifically point out that Site 11 is within Wood Pasture habitat which is rare. However, for sites in such a sensitive location, applications for development will be scrutinised for their potential impact on the nearby SAC sites.</p>	
			<p>7. In terms of archaeology it would seem that the principal areas of proposed new housing would be in <i>Goodrich Cross</i>, rather than the very sensitive historic village or elsewhere. From an archaeological point of view (although some issues of a moderate nature might still apply) this would plainly be preferable and is supported.</p>	
			<p>8. In terms of Environmental Health the three sites proposed for development, identified in brown on 'Map 2; Goodrich Village Policies Map' appear from a review of Ordnance survey historical plans to have no previous historic potentially contaminative uses.</p>	

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			<b>Please refer to Appendix 1 for discussion and detailed reasoning for the inclusion of these sites within the NDP</b>	
	GWB16		In general conformity with Herefordshire Local Plan Core Strategy  <b>Noted</b>	No change proposed
	GWB17		In general conformity with Herefordshire Local Plan Core Strategy  <b>Noted</b>	No change proposed
	GWB18		In general conformity with Herefordshire Local Plan Core Strategy. Criteria G- Include provision that encourages visiting by active travel (eg. cycle parking etc) And migrated accordingly if required. Depending on size of tourist facilities, A transport assessment/statement will be required.  <b>Conformity noted. The requirements to promote active travel and provide cycle parking are covered by policies GWB6 and GWB8. The issue of the need for a transport assessment is a process one in order to show that policy requirements can be addressed.</b>	No change proposed
	GWB19		In general conformity with Herefordshire Local Plan Core Strategy. Appropriate safeguards against the loss of existing employment in the Parish in accordance with CS policy E2 will also apply. You have mentioned above that some industrial areas can be accessed through sustainable travel. There should be some mention of this in the policy. Active travel measures (e.g covered cycle parking, lockers etc, etc).  <b>Conformity noted. There are no employment sites within the Parish that have been identified in Herefordshire County Employment Land Study 2012. Local employment is based primarily upon working from home, tourism and agriculture. There are some small businesses that operate from small rural buildings but no employment sites. Such sites fall within the adjacent parish of Whitchurch and Ganarew. It is these to which the reference to access by sustainable means refers. As they are outside of the NDP area, they cannot be covered by policies requiring them to provide cycle parking, etc. However, should new or expanded employment use for land or buildings come forward Policy GWB6 would apply and this refers to the need to provide storage for cycles.</b>	No change proposed
	GWB20		In general conformity with Herefordshire Local Plan Core Strategy. If a farm is changing to require seasonal workers, highway safety should be reviewed in relation to the increase of pedestrian movements and highway safety.	No change proposed

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			<b>Conformity noted. There is no suggestion that this may be likely within the NDP area, especially given its location within the Wye Valley AONB and the emphasis on scale of proposals being appropriate. However, Policies GWB8 and GWB9 would be relevant to any proposals in addition to Policy GWB20(d).</b>	
	GWB21		In general conformity with Herefordshire Local Plan Core Strategy <b>Noted</b>	No change proposed
S2 Welsh Water	Whole plan	Support	DCWW are supportive of the aims, objectives and policies set out. <b>Noted</b>	No change proposed
Dwr Cymru (Statutory Consultee)	Policy GWB7	Support	Particularly welcome this policy which ensures that should there be insufficient capacity at the Goodrich Wastewater Treatment Works (WwTW), there is the local policy basis to ensure that no development can come forward until reinforcement works are undertaken. <b>Noted with thanks</b>	No change proposed
	Policy GWB15	Comment	There are no issues with providing any of these sites with a supply of clean water or in connecting to the existing public sewerage network, however off-site sewers may be required in order to connect to the existing public sewerage network. <b>Noted with thanks</b>	No change proposed
	Policy GWB15	Comment	There are not anticipated to be any issues with regard to the Goodrich WwTW accommodating the foul only flows from the proposed allocations, though as previously mentioned, Policy GWB7 provides the required assurance if there is insufficient capacity in the future. <b>Noted with thanks</b>	No change proposed
S3 Woodland Trust	Sections 3 and 4	Comment and suggested change	Pleased to see that landscape character, such as mixed woodland, is being included as the first issue to be taken into account with your Neighbourhood Plan for Goodrich. Trees are some of the most important features of the area for local people. This is being acknowledged with the adopted Hertfordshire Local Plan Core Strategy 2011-20131, which resists development resulting in the loss of woodland, hedgerows and trees. One of the objectives of Policy LD3 (Green Infrastructure) is to protect, manage and plan for the preservation of valued landscapes, such as trees and hedgerows and woodlands. This general Local Plan policy should also be taken into account with the issues, vision and objectives in the	No change proposed

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			<p>Neighbourhood Plan for Wyeside. Therefore, the Natural and Historic Environment and Environmentally Sustainable Development Section in your Issues and Options of your Neighbourhood Plan, should be amended to also seek to protect and enhance the local landscape character of Goodrich, and include the following:  <b>“To protect and enhance the local environment, green and open spaces, ancient woodland, veteran trees hedgerows and trees”.</b>  <b>The Issues and Options section recognises that landscape features are important, and this is indicated in the first bullet point in para 3.2 and such features would include trees, hedgerows and woodlands. The suggested change is expressed as an objective which would be more appropriate to include in para 4.3. In that regard it is already reflected in the objective set out in the third bullet point.</b></p>	
	Section 5	Comment and suggested change	<p>Pleased to see that the Neighbourhood Plan identifies the fact that ancient trees and hedgerows are prominent in the landscape of your areas, and which need to be conserved or enhanced, and how any new development in your Parish needs to respect this distinctive landscape character. The Plan should also seek to ensure development must conserve mature trees and hedgerows, so there is no loss or degradation of ancient woodland in your parish. It should also support conserving and enhancing woodland and trees, such as Oak trees, with management, and also to plant more trees in appropriate locations. Increasing the amount of trees and woods will provide enhanced green infrastructure for your local communities, and also mitigate against the future loss of trees to disease (eg Ash dieback), with a new generation of trees both in woods and also outside woods in streets, hedgerows and amenity sites.</p> <p>Ancient woodland would benefit from strengthened protection building on the NPPF with changes proposed and suggested new paragraph 173 c stating:</p> <p>‘development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused, unless there are wholly exceptional reasons and a suitable mitigation strategy exists. Where development would involve the loss of individual aged or veteran trees that lie outside ancient woodland, it should be refused unless the need for, and benefits of, development in that location would clearly outweigh the loss;’</p> <p>Therefore, we would recommend that either Policy GWB2 (Conserving the Landscape and Scenic Beauty within the Wye Valley AONB) or Policy GWB3 (Enhancement of the Natural Environment) should include something along these lines:</p>	See change No 13

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
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***“Substantial harm to or loss of irreplaceable habitats such as ancient woodland, should be wholly exceptional”.***

The Woodland Trust would suggest that your Neighbourhood Plan is more specific about ancient woodland protection. For example, the introduction and background to the consultation on the Kimbolton Neighbourhood Development Plan (2017) identified the importance of ancient woodland, and how it should be protected and enhanced. Also, we would like to see buffering distances set out. For example, for most types of development (i.e. residential), a planted buffer strip of 50m would be preferred to protect the core of the woodland in the geographical area of your Neighbourhood Plan. Standing Advice from Natural England and the Forestry Commission has some useful information:

<https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

The profile of Goodrich identifies the need to retain and enhance its rural character as a small rural settlement, and also the need for development to integrate with the landscape. Given that Neighbourhood Plans are a great opportunity to think about how trees can also enhance your community and the lives of its residents, the natural environment and tree and woodland conservation in Goodrich should also be taken into account with a Policy in your Plan.

Therefore, we would like to see the importance of trees and woodland recognised for providing healthy living and recreation also being taken into account with your Neighbourhood Plan. In an era of ever increasing concern about the nation’s physical and mental health, the Woodland Trust strongly believes that trees and woodland can play a key role in delivering improved health & wellbeing at a local level. Whilst, at the same time, the Health & Social Care Act 2012 has passed much of the responsibility for health & wellbeing to upper-tier and unitary local authorities, and this is reinforced by the Care Act 2014. Also, each new house being built in your parish should require a new street tree, and also car parks must have trees within them.

**The protection of trees and hedgerows is afforded through policies [GWB2 a](#) (as features); [GWB3](#); [GWB11](#) (as the natural environment); and [GWB14 e](#). Woodlands, including ancient woodlands and woodlands planted on ancient woodland sites, are protected through policies [GWB2](#) and [GWB3](#). Reference is made in the latter to the protection**

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
	Section 11	Comment	<p>afforded through Herefordshire Local Plan Core Strategy Policy LD2. However, the protection of ancient woodlands, woodlands in general and wildlife habitats might be made more explicit in Policy GWB2. The reference to substantial harm and reference simply to irreplaceable habitats may water down the policy. Notwithstanding the suggestion specific to woodlands, the specification of standard buffers may also be to the disadvantage of some habitats. The need for landscape proposals in association with development is required through Policy GWB2. None of the sites allocated for development in the NDP affect any woodland, be it ancient or otherwise.</p> <p>Whilst the Woodland Trust is pleased to see that the implementing of your Neighbourhood Plan will be taken forward through determining planning applications, the delivery of your Plan should also acknowledge the fact that there should be no loss of ancient woodland or veteran trees and that a number of new trees and hedges will be planted. It should also seek to protect ancient hedgerows and deciduous woodlands, as well as also seeking to retain and enhance open green spaces and resist the loss of open space, whilst also ensuring the provision of some more, and to what extent there is considered to be enough accessible open space in your community also needs to be taken into account. There are Natural England and Forestry Commission standards which can be used with developers on this:</p> <p>The Woodland Access Standard aspires:</p> <ul style="list-style-type: none"> <li>• That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.</li> <li>• That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people’s homes.</li> </ul> <p>The Woodland Trust also believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change, like flooding and the water quality implications caused by extreme weather events. This is important in the area covered by your Neighbourhood Plan because trees offer opportunities to make positive water use change, whilst also contributing to other objectives, such as biodiversity, timber &amp; green infrastructure - see the Woodland Trust publication <b>Stemming the flow</b> – the role of trees and woods in flood protection - <a href="https://www.woodlandtrust.org.uk/publications/2014/05/stemming-the-flow/">https://www.woodlandtrust.org.uk/publications/2014/05/stemming-the-flow/</a>.</p> <p><b>The benefits of trees for health and wellbeing and to increase resilience in terms of water management are acknowledged. However, the NDP can only protect landscape features, seek their enhancement and promote access where this relates to development proposals. Other mechanisms are in place to promote woodland planting, the</b></p>	No change proposed

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			licensing of tree felling, countryside hedgerow protection and the negotiating of new public rights of way. Where appropriate the Parish Council would consider working with other relevant organisations and the example of Coppet Hill Local Nature Reserve is an example of where this has happened. This provides public access close to Goodrich village, to a range of habitats including woodland.	
S4 Historic England (Statutory Consultee)	Whole Plan	Support	Support both the content of the document and the vision and objectives set out in it.  The emphasis on the conservation of local distinctiveness through good building design that respects local character and the protection of locally significant buildings, farmsteads and landscape character including archaeological remains and important views is to be applauded.  <b>Noted with thanks</b>	No change proposed
	Appendices 1 and 2	Support	The Village Design Statement at appendix 3 will no doubt be invaluable in providing a detailed context for developers and forms an important part of what is an extremely sound evidence base for the Plan that includes reference to the Herefordshire Council Historic Environment Record and County Landscape Character Assessment.  <b>Noted with thanks</b>	No change proposed
	Whole Plan	Comment	Overall the plan reads as a well-considered, concise and fit for purpose document which we consider takes a suitably proportionate but very thorough approach to the historic environment of the Parish.  <b>Noted with thanks</b>	No change proposed
	Whole Plan	Comment	The approaches taken in the plan exemplify “constructive conservation” and those responsible for its production should be congratulated.  <b>Noted with thanks</b>	No change proposed
S5	HRA	Comment	Agree with the conclusion of no likely significant effect upon River Wye Special Area of Protection (SAC)  <b>Noted</b>	No change proposed

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
Natural England (Statutory Consultee)	Whole Plan	Comment	No specific comments to make but attach a standard statement of issues and opportunities to consider when preparing Neighbourhood Plans  <b>Noted</b>	No change proposed
S.6 Environment Agency (Statutory Consultee)	Whole Plan	Comment	It is important that these plans offer robust confirmation that development 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. We would not, in the absence of specific sites allocated within areas of fluvial flooding, offer a bespoke comment at this time. We note you have utilised guidance and pro-forma to inform your draft Plan. It would 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 (all sites are located outside of any SPZ). 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).  <b>Comments noted. 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. 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.</b>	No change proposed
S.7 Highways Agency (Statutory Consultee)	Whole Plan	Comment	Confirmed no comment to make upon the NDP  <b>Noted</b>	No change proposed
S.8 Walford Parish Council	Section 4  Para 3.11	Comment  Objection	We appreciate the way you have put forward your vision for your area, with a clear set of statements about what you want to see.  <b>Noted with thanks</b>  We are concerned about your comment on the possible need to control operations at the Kerne Bridge canoe launch. Since this is situated on the Walford side of the river, we feel that you should not include the comment in its current	No change proposed

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
	Bullet 6		form. If you are concerned about the level of canoe traffic on the river, then this should be reflected in a need to enter into discussions with all involved, rather than, as you put it, a need to control operations over which you have no direct say.  <b>The advice is noted and appreciated. An amendment is proposed that it is hoped will satisfy Walford Parish Council</b>	
	Para 3.11 Bullet 9	Support	We would like to express our support when it comes to re-opening the old railway viaduct, since this impacts upon users of the Wye Valley Walk passing through Walford.  <b>Noted with thanks</b>	No change proposed
S.9 Coal Authority	Whole Plan	Comment	The Neighbourhood Plan area does not contain any surface coal resources or recorded risks from past coal mining activity at shallow depth. Therefore, The Coal Authority has <b>no specific comments</b> to make on the Neighbourhood Plan.  <b>Noted with thanks</b>	No change proposed
S.10 Severn Trent Water	Whole Plan	Comment	No specific comments to make however, we have attached some general information and advice for your information.  <b>Noted with thanks. NB – Welsh Water’s response indicates that it is responsible for the public sewer, waster water treatment and water supply and consequently Severn Trent Water is not affected by proposals in the NDP.</b>	No change proposed
S.11 National Grid	Whole Plan and Policy GWB15	Comment	The high voltage overhead power line 4YU Route - 400kV from Rassau substation in Blaenau Gwent to Walford substation falls within the NDP area together with 8 underground cables. The above overheads power line does not interact with any of the proposed development sites. Whilst there is no implications for National Grid Gas Distribution’s Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites.  <b>Noted with thanks.</b>	No change proposed

## APPENDIX 1

### GOODRICH AND WELSH BICKNOR NEIGHBOURHOOD DEVELOPMENT PLAN

#### Policy GWB15 – Housing Sites in Goodrich Village

#### 1. Introduction

1.1 The Regulation 14 draft NDP proposes three sites for housing development through policy GWB15. Their development will be subject to relevant policies within the NDP.

1.2 The Policy states:

**The following sites identified on Goodrich Village Policies Map are proposed for development:**

- a) **Land opposite Dean Swift Close amount to around 0.4 hectares (1.0 acres)**
- b) **Land comprising the former Nutshell Caravan Park amounting to around 1.2 hectares (3.0 acres)**
- c) **Land off Springfield Road north-east of Goodrich Manor amounting to 0.4 hectares (1.0 acres)**

1.3 Supporting texts indicate particular design matters that need to be addressed for the individual sites:

*'8.12 **Land opposite Dean Swift Close:** This site is currently an overgrown area of scrubland between Dean Swift Close and the A40, although it sits above that road with a tree screen along its mutual boundary. The site currently has an access on its northern side where speeds are generally low. The principle requirement will be to ensure the amenity of future residents is protected from noise through landscaping, layout and good house insulation. Landscape design will be important, and it should be possible to provide appropriate visibility in terms of vehicular access. A figure of 6 dwellings is suggested as the contribution the site might make to the required level of housing growth in order to accommodate the design constraints indicated.'*

*'8.13 **Land comprising the former Nutshell Caravan Park:** This is a brownfield site previously used for touring caravans but now redundant. It forms an extension to Goodrich Cross and offers an opportunity for development that should provide an element of affordable housing. Again, design constraints will require attention to be paid to protecting residential amenity from the effects of noise through design of landscaping, building orientation, building insulation and layout. This may be informed by an appropriate noise impact assessment. The estimated number of dwellings contribution for this site (15) reflects the need to protect amenity and provide a high-quality landscape scheme.'*

*'8.14 **Land off Springfield Road north of Goodrich Manor:** This site is*

*currently the subject of a planning application for 9 dwellings and is in a similar location to the Nutshell Caravan Park site. Accordingly, similar design requirements will need to be addressed'.*

## **2. Representations received.**

- 2.1 Six representations contained comments both in support of and objecting to the allocations of housing sites contained within Policy GWB15.
- 2.2 Representation S.2 (Welsh Water Company) advises that there are no problems in providing a water supply or connecting to the mains sewer for these sites although off-suite works may be required.
- 2.3 Representation C.8 offers qualified support for all three sites. The representation suggests that the maximum number of dwellings on sites a) and b) should be 20 and that they should remain sympathetic in size of the settlement at Dean Swift Close.
- 2.4 The remaining representations (C.4; C.7; C.10; and S.1) are considered to be objections or raise concerns that are summarised as follows:
  - i) Highway Safety
  - ii) Pollution to Air and from Noise
  - iii) Effect on the Landscape of the AONB
  - iv) Site is severed from the village by the A40
  - v) The site is shown as having significant constraints within the SHLAA
- 2.5 Representations C.4 and C10 advocate an alternative site in preference to those included within the Plan.

## **3. Highway Safety**

- 3.1 Herefordshire Council was consulted upon the NDP and no highway comments upon any of the sites were received from its Transportation and Highways section. Highways England offered no comments upon the NDP.
- 3.2 It should be noted that site WGB15c) now has planning permission (Code 163251 - [https://www.herefordshire.gov.uk/info/200142/planning\\_services/planning\\_application\\_search/details?id=163251&search=Bivia](https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=163251&search=Bivia)). In relation to this proposed site within the NDP HC's Transportation and Highways section offered an additional late comment '*this one they need to look at the comments regarding the recent planning applications.*' The comments from that section indicate that it initially had concerns about access, but these were resolved leading to the grant of planning permission. It should be noted that this site does not abut or have ready access to a metalled footpath.
- 3.3 Additional late comments from HC's Transportation and Highways section in relation to Site WGWB15a) indicated it has '*not got an issue with this one, however the correct visibility splays and connections to the village need to be addressed*'. Site

WGB15b) already has a vehicular access that was considered suitable for its use as a caravan and camping site. Again, additional comments were received from HC's Transportation and Highways section in relation to this site indicated *'Depending on how many dwellings they are looking to put on this plot on land, it will require consultation with Highways England. Like before the correct access/visibility splays should be put there. If a large site is proposed, then connections to the village are a must with improvements to footway and the provision of cycle ways being provided.'* As indicated above, it should be noted that Highways England has not offered any comments upon the draft NDP which suggested 15 dwellings upon this site.

- 3.4 Both sites WGB a) and b) immediately abut public footpaths that connect them with nearby bus stops. The footpaths also link them to the Cross Keys Public House. There are very few public footpaths within other parts of the settlement.
- 3.5 If by 'access to the village' this relates to facilities provided for the settlement then it should be noted that these are extremely limited and spread across all three parts of the village. The two sites are located on a reasonably good public transport route (in Herefordshire terms) either immediately or very close to the bus stops. Ross-on-Wye, Monmouth and even Whitchurch are locations where most services, facilities and employment are available, and these sites are well located to take advantage of public transport to these.

#### **4. Pollution to Air and from Noise**

- 4.1 This is recognised as a disadvantage in relation to all three sites and consequently research was undertaken to determine whether the matter could be addressed through policy requirements (as opposed to detailed assessment that would normally be how the matter would be addressed in a planning application).
- 4.2 Subsequent late comments from HC's Environmental Health section indicated that noise from the A40 is likely to have a substantial adverse impact on any residential proposal that abuts it or is even close to it; there will be a high-risk noise environment and that would pose substantial challenges to acceptable indoor and external amenity standards being met; and expressed extreme caution until more was known about the noise at the site before it goes into the plan.
- 4.3 In this regard, it was noted that Herefordshire Council had not found either of the noise issue or that of air pollution to be so critical or unsurmountable for other housing proposals in similar locations adjacent to the A40 within both Goodrich and the adjacent Parish of Whitchurch and Ganarew such that they would outweigh other material considerations.
- 4.3 The evidence for this is as follows:

- i) Planning permission granted on 25<sup>th</sup> January 2018 for the site set out in Policy WGB15c) (Code P163251 - [https://www.herefordshire.gov.uk/info/200142/planning\\_services/planning\\_application\\_search/details?id=163251&search=Bivia](https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=163251&search=Bivia) ). This was approved through a delegated decision following submission of a consultant's noise report. After reading the noise consultant's report and in the light of the design approach, the Environmental Health Officer indicated there was no objection on the grounds of noise subject to conditions. No air pollution issues were raised.

This site is in a far less advantageous location in terms of noise than those proposed in Policy WGB15 a) and b) because of its topography, generally open nature and slope which rises up above the A40.

- ii) Planning permission for 9 terraced houses granted on 17<sup>th</sup> July 2018 at Kirby's Yard, Whitchurch (Code P170198 - [https://www.herefordshire.gov.uk/info/200142/planning\\_services/planning\\_application\\_search/details?id=170198&search=P170198/O](https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=170198&search=P170198/O) ). This site is only 22m from the centre of the A40, much less than either WGB15 a) or b). In relation to this site, HC's Environmental Health section asked for the houses to be moved closer to the road in order to have larger rear gardens protected from the road from which they will be protected by the houses. The concerns appear to have been noise within external space, accepting that that inside the house could be accommodated through insulation. There was also an acceptance of a higher than normal noise level.
- iii) Planning permission for 4 semi-detached houses granted on 3<sup>rd</sup> September 2012 at Mill House, Whitchurch (Code P121610 - [https://www.herefordshire.gov.uk/info/200142/planning\\_services/planning\\_application\\_search/details?id=121610&search=S121610/F](https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=121610&search=S121610/F) ). Again, this site is closer to the centre of the A40 than either WGB15 a) or b). Noise appears not to have even been raised as an issue. This may be because of the tree screen bank on its eastern edge, which is similar to that at Site WGB15 b).
- iv) Planning permission granted for two pairs of semi-detached houses on 17<sup>th</sup> December 2012 on land adjacent to Whitchurch Fire Station (Code S121222 [https://www.herefordshire.gov.uk/info/200142/planning\\_services/planning\\_application\\_search/details?id=121222&search=S121222/F](https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=121222&search=S121222/F) ) and

subsequent permission on part of the site for a further two dwellings approved on 8<sup>th</sup> October 2014 (Code P142183 - [https://www.herefordshire.gov.uk/info/200142/planning\\_services/planning\\_application\\_search/details?id=142183&search=P142183/F](https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=142183&search=P142183/F) ).

Again, the centre of this site is closer to the A40 than the centres of sites GWB15 a) or b). In relation to the first application, HC's Environmental Health section did not object. In relation to the second application although HC's Environmental Health section did not object then planning officer considered the issue of noise, concluding 'The bungalows have no main habitable room windows facing the noise source and their gardens are their front (in the acoustic shadow of the buildings).'

4.4 None of the applications considered pollution to air to be a material consideration.

4.5 The figure below shows the locations of the sites concerned:

Figure 1: Sites with Planning Permission Adjacent to the A40



Whitchurch

Cross Keys  
Goodrich

- 4.6 In relation to site GWB15 a), this sits above the A40 road behind a narrow tree screen. From inspection, it would appear that this site is the least adversely affected from noise pollution. The tree screen could be enhanced through further tree planting that could also screen an acoustic barrier. These would add to site a site layout that would place garden areas on the opposite side to any dwellings, and which locates non-habitable accommodation closest to the road. It is considered that the result would be much better in terms of reducing noise pollution to acceptable levels than that accepted for site GWB15 c) which has received planning permission.
- 4.7 For site GWB15 b), this sits below the height of the A40. A landscaped acoustic barrier placed along its upper eastern edge that directed noise upwards would benefit the site. Development could be concentrated within that part of the site where a noise assessment finds the adverse effects of road noise to be least. The site's size is similar to that of GWB15 c) and offers the opportunity for a design where buildings again can be used to shield private outdoor space.

## **5. Effect on the Landscape of the AONB**

- 5.1 Of the three sites included within Policy GWB15, site c) is the most visible and there were no objections by HC's Landscape Officer subject to a detailed landscape and management plan, which is a matter of detail rather than principle and covered by other policy provisions within the NDP. The other two sites have a very limited local effect on the landscape, being in areas that are not visible from key vantage points and already being well screened.
- 5.2 When consulted on the NDP at the Regulation 14 stage, no comments were received upon any of the sites from the Landscape Officer.
- 5.3 The Council's Ecologist similarly made no objection to any of the sites advising that there were no priority habitats or designations on the three sites.
- 5.4 The Council's Archaeological Adviser commented '*It would seem that the principal areas of proposed new housing would be in Goodrich Cross, rather than the very sensitive historic village or elsewhere. From an archaeological point of view (although some issues of a moderate nature might still apply) this would plainly be preferable and is supported.*'

## **6. Site is severed from the village by the A40**

- 6.1 Goodrich Cross is the largest of the three parts of Goodrich settlement in terms of number of houses. Goodrich Cross itself is divided by the A40. The granting of planning permission for site GWB15 c) draws the area closer to the other two parts

Goodrich and this will benefit community cohesion. The approach to drawing all three areas closer together addresses the social dimension of Sustainable Development set out in National Planning Policy Guidance. There are many examples of settlements that have a number of parts defined for them, locally - for example - there is, Bridstow which comprises three separate areas and these are divided by the A49, another trunk road.

- 6.2 Goodrich settlement is not the only settlement along the A40 that that road runs through and divides. Whitchurch immediately to the south is similarly divided and growth has been both permitted and proposed on either side of the road.

## **7. The site is shown as having significant constraints within the SHLAA**

- 7.1 The SHLAA (2012) produced by Herefordshire Council that covered sites GWB15 a) and b) was substantially a desk-top exercise to show that sufficient sites were available to support its housing strategy. There are numerous examples where the SHLAA has identified sites as having no potential for development which have subsequently received planning permission for housing. The site at GWB15 c) is an example in point and this was subject to the more rigorous SHLAA in 2015. This assessment has been given no weight in relation to previous planning applications.

## **8. Site Options**

- 8.1 All submitted sites, including site 4 (Meeting Housing need and Site Assessment Report), were assessed against a number of criteria. These criteria were agreed by the Parish Council and the assessment undertaken by an independent consultant. All sites had advantages and disadvantages.
- 8.2 It is understood that HC's Environmental Health section has raised a similar objection to site 4 on the grounds of noise to that for the sites proposed in the NDP (Code P181255 - [https://www.herefordshire.gov.uk/info/200142/planning\\_services/planning\\_applications\\_search/details?id=181255&search-term=E04000765&search-service=parish&search-source=Parish&search-item=Goodrich](https://www.herefordshire.gov.uk/info/200142/planning_services/planning_applications_search/details?id=181255&search-term=E04000765&search-service=parish&search-source=Parish&search-item=Goodrich) ). In addition, the location is far more visible within the wider landscape than those included in the NDP.

## **9. Level of development**

- 9.1 The suggested level of development on sites GWB15 a) and b) represents a lower density than that of the development at Dean Swift Close. Some 18 dwellings have been built or received planning permission in the other two parts of the settlement since 2011. In suggesting around 6 and 15 dwellings respectively for the two sites, and with 9 dwellings on the site with planning permission, the resulting 30 dwellings is considered reasonable, especially as there is a need for family homes.
- 9.2 The Regulation 14 draft NDP did not suggest any allowance for windfall development either through small sites released within the settlement boundary or through development in the countryside through the provisions of Herefordshire Local Plan Core Strategy Policy RA3 (and subsequent provisions). Herefordshire Local Plan Core Strategy originally suggested a figure of 19% of dwellings required might come through such an allowance. This would equate to around 7 dwellings.

## **10. Other material Considerations**

- 10.1 Development so far within the plan period has mainly comprised large detached houses which have resulted in an increased population imbalance within the community, with few family houses being provided and no affordable dwellings. The thrust of the housing strategy for the remaining plan period is to address this imbalance by providing housing that will meet the shortage, which in turn try to meet local needs. Of the sites that are suitable and available, that at GWB15 b) is considered to be the only one that would bring forward the combination of family and affordable housing. Site GWB15 a), given its location, is also thought most likely to provide family accommodation.
- 10.2 Site GWB15 b) is a brownfield site, previously used as a caravan and camping site and complies with NPPF paragraph 111 and Herefordshire Local Plan Core Strategy policy SD1. The site is not of high environmental value (see section 5 above). Site GWB15 a) is of low environmental value, has no value in terms of agricultural use and adversely affects the amenity of the adjacent dwellings.
- 10.3 Site GWB15 b) is currently a location attracting significant anti-social behaviour which the community has considerable concerns about. A new use involving development would address the problem. No alternative uses to housing have been identified.

## **11 Conclusion**

- 11.1 The NDP is a document that determines whether housing sites are suitable in principle. In this regard it, unless there are issues that are critical and

unsurmountable, then determining which are the most appropriate sites is a matter of weighing considerations and reaching a balanced judgement.

- 11.2 One critical issue is effect on the landscape of the Wye Valley AONB, with NPPF paragraph 116, in particular, indicating that 'major development' should be refused unless there are exceptional circumstances in the public interest. It is considered that none of the proposed sites conflicts with this requirement. The historic environment is also important both to the AONB and Goodrich settlement, given its location in relation to Goodrich Castle, and regard has been taken of the archaeological advice.
- 11.3 Protection of amenity is an important consideration and the effects of noise can affect this. However, guided by recent nearby examples of planning decisions for sites similar in location to those proposed, including one of those proposed in the NDP which now has planning permission, this issue has not proved to an overriding constraint, albeit one that should be given significant weight.
- 11.4 Advice in relation to highway matters is considered sufficient to determine that they nought not to affect the principle of development on the sites proposed.
- 11.5 Having considered that all other matters should be given little weight, the determining factors in relation to the three sites proposed in the NDP are considered to be:
  - on the one hand, the adverse effect of noise upon the sites,
  - while on the other the benefits in terms of using brownfield land or underused land, addressing anti-social behaviour, seeking to draw the various parts of the settlement closer together, and, most importantly, providing family and affordable housing for the whole community.

On balance, given the evidence that the potential noise problems have been capable of being addressed to an acceptable degree in similar locations, the benefits outweigh the disadvantage.

- 11.6 A minor addition to highlight the need to address noise and landscape mitigation would benefit the policy.

# **Goodrich and Welsh Bicknor Neighbourhood Development Plan**

**Schedule2: Changes to the NDP Regulation 14 draft plan, including those made in response to comments received and matters arising since the commencement of the consultation period.**

**(NB small changes resulting from typographical, similar errors and small consequent changes such as page and paragraph numbering are not shown)**

**June 2018**

## Goodrich and Welsh Bicknor 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 ' <b>GOODRICH AND WELSH BICKNOR GROUP PARISH_Neighbourhood Development Plan 2011 - 2031</b> <b><u>Submission Draft – July 2018'</u></b>	To reflect the next stage in the plan making process
2	Footer	Amend to read: ' <u>Goodrich and Welsh Bicknor Group Parish Neighbourhood Development Plan 2011 - 2031 Submission Draft – July 2018'</u>	To reflect the updated version
3	Regulation 14 Notice	Delete notice	The notice is no longer required as that formal stage has passed.
4	Figure 1	Amend plan to show the next stage in the NDP making process	To show the next formal stage that the plan has reached.
5	Para 2.22 (previously 2.24)	Change last sentence to read: <u>'No areas of derelict land have been identified although one brownfield site was submitted through the 'Call for Sites' together with another area comprising wasteland.'</u>	Update of information
6	Para 2.23 (previously 2.25)	In line 2 insert ' <u>the AONB</u> ' in front of 'Management Plan'	To add clarity

7	Para 2.33 (previously 2.35)	Amend second sentence to read:  <u>'The Wye Valley Walk passes through the south of Parish and there are also a number of marked cycle routes although these utilise narrow lanes that are also used by vehicles.'</u>	Update of information
8	Para 3.4, bullet 3	Amend to read:  <u>'There is a popular and well used open green space behind the school, maintained by the Parish, that provides swings, and slides as well as a wider area for children to play on and explore.'</u>	Update of information
9	Para 3.4, bullet 6	Amend to read:  <u>'Until 2017, a Village Shop provides post office services and a limited range of foodstuffs and other merchandise which had been significantly reduced over time as demand changed. The former shop has been converted to provide accommodation and will not reopen.'</u>	Update of information
10	Para 3.11, bullet 6	Amend to read:  <u>'The number of canoes being launched from the Kerne Bridge launch site (situated in neighbouring Walford Parish), has led to a very high and increasing level of canoeists on the stretch of the River Wye SAC that runs through the Parish or along its border for some 8 1/2 miles between Kerne Bridge and Symonds Yat East. It would be beneficial to promote measures to control numbers, in order to avoid degradation of both the environment and the countryside experience and thereby also achieving a balance between canoeing and the coarse and salmon fishermen who are also important to the local tourist businesses.'</u>	To respond to the representation by Walford Parish Council
11	Para 4.2, bullet 3	Amend to read:  <u>'Be a location which promotes and encourages successful farming and small businesses, providing an environment where young members of the community can seek employment and remain in the Parish.'</u>	To improve grammar

12	Policy GWB1	<p>Amend point b) to read:</p> <p><b>b) The natural, built and historic environment within the Parish will be <u>conserved</u> and enhanced, and local distinctiveness maintained.</b></p> <p>Replace point e) with:</p> <p><b>e) The Neighbourhood Development Plan provides the scope to deliver at least the minimum target of 35 dwellings over the period 2011-2031 with 18 dwellings already having been built or having planning permission. The sites identified will provide the potential to build dwellings that will meet the needs of the local and wider community in terms of size, type and tenure.</b></p>	<p>1. To respond to advice from the Wye Valley AONB.</p> <p>2. To add clarity</p>
13	Policy GWB2	<p>Amend policy to read:</p> <p><b>Within the Wye Valley AONB development should not harm the character or scenic beauty of the landscape, its landscape features, important views, wildlife <u>habitats</u> or cultural heritage. These should be <u>conserved</u> and enhanced. Planning permission will be refused for major development unless there is a proven public interest, no viable alternative sites <u>outside of the designated area</u> are available to accommodate this development, and its environmental effects can be mitigated to a satisfactory degree. In determining whether a proposal is major development the following considerations should be taken into account:</b></p> <p><b>The need to <u>retain</u> the contribution to and <u>conserve the</u> quality of landscape character, features and views, to the AONB, in particular the Wye Valley Gorge;</b>  <b>For development adjacent or close to Goodrich village, the scale of development in relation the size of this particular part of the settlement as well as its setting;</b>  <b>The effect upon wildlife, cultural heritage, tourism and recreational opportunities, in particular Goodrich Castle and Coppet Hill Local Nature Reserve</b>  <b>For development elsewhere, the scale should match the locality;</b>  <b>The maintenance of tree and woodland distribution and cover and opportunities for its enhancement.</b></p> <p><b>Development proposals which are acceptable in principle should contribute positively to the Group Parish’s rural character, ensuring not only that the effect on the landscape and settings of</b></p>	<p>To respond positively to helpful representations</p>

settlements, as appropriate, are mitigated but include measures to restore and enhance landscape features such as trees, woodlands, vistas and panoramic views. To achieve this, building or engineering design should ensure the development fits sensitively into the landscape in terms of scale, form, massing and detail. Landscape proposals should form an integral part of the design, retaining and enhancing as many natural features within or surrounding the site as possible.

14	Paragraph 5.4	Add a new sentences into the paragraph after sentence 1 to read:  <u>These include whether the development is in the public interest, which includes national considerations and effect upon the local economy; the cost of and scope for developing outside of the AONB or meeting the need in some other way; and the extent to which the effects on the environment, landscape and recreation can be moderated. All three factors have to be considered. Within Policy GWB2, the first issue is covered by the requirement for the development to be in public interest; the second by reference to there being no viable alternative; and the third by reference to the need for satisfactory mitigation.</u>	To add clarity and respond positively to helpful representations
15	Paragraph 5.6	Replace '2.20' in the second sentence with ' <u>2.30 and 2.31</u> '	To correct an error
16	Policy GWB6	1. Revise so that the second sentence becomes criterion a) with the subsequent criteria being re-numbered.  2. In criterion b) – Now c) insert 'and cyclists' between 'pedestrian' and 'friendly'. 3. In criterion c) – Now d) replace 'sustainable' with 'active'.	1. To correct error in formatting.  2 and 3 - on the advice of Herefordshire Council
17	Policy GWB7	Replace ' <b>WwTWs</b> ' with ' <b>Goodrich Sewage Treatment Works</b> '	To add clarity
18	Policy GWB8	Amend 1 <sup>st</sup> paragraph to read:  <b>'Goodrich and Welsh Bicknor Group Parish Council will work with the Highways England, Herefordshire Council, developers and others to bring forward measures to improve the road</b>	Both on the advice of Herefordshire Council

network, to address noise and air pollution problems, improve road safety, increase transport choices, improve active travel, and reduce the impact of vehicles resulting from development.'

Amend 3<sup>rd</sup> paragraph to read:

'Development proposals should encourage active travel and include positive measures to address and mitigate the problems caused by vehicles resulting from their development.'

19 Policy GWB9

Amend criteria b) and c) to read:

- a) **Proposals should not result in indiscriminate or on-street parking but should provide adequate off-street parking for residents, employees and visitors as appropriate, by providing a minimum of two off-road parking spaces for all dwellings and three or more spaces for 3 or more bed dwellings, and preferably address the reduction of any on-street parking problems that may exist within the vicinity. Parking for other forms of development should be in accordance with Herefordshire Council's Highways Design Guide for New Developments. In addition, off-road parking spaces should be constructed using permeable materials;**
- b) **Proposals should not lead to a significant increased (*i.e. deleting reference to speed*) volume of traffic travelling through villages within the parish or on roads that do not have sufficient capacity;**

To take into account some of the concern expressed by Herefordshire Council Transportation and Highway section.

20 Para 7.1

Revise first two sentences to read:

'The Parish possesses a number of community services and facilities. These include its Primary School, its pubs and hotels, a café at Goodrich Castle, the village hall, church, cricket and tennis facilities. The village shop and post office closed in 2017 and will not reopen.

To reflect the change in circumstances with the shop and post office.

21	Policy GWB11	Amend final paragraph to read:  <b>'The loss of key services or facilities through the change of use of premises to an alternative will be opposed unless it is clear <u>and demonstrable</u> that the service or facility concerned is no longer viable or required.'</b>	To take into account the advice of Herefordshire Council
22	Para 7.2	Amend 3 <sup>rd</sup> sentence to read:  'Currently there are no firm proposals, through sites being identified and funding arranged, for new facilities although a replacement post office <u>and village shop</u> is a facility that would be enabled in an appropriate location through this policy.'	To reflect the change in circumstances with the shop.
23	Policy GWB13	Amend the Policy title to read:  <b>Policy GWB13: Moors Meadow <u>and Church Field</u> Local Green Space</b>	To indicate that the policy relates to both sites
24	Para 7.6	Redraft to read:  'The area of open undeveloped space to the south- <u>west</u> of St Giles Church allows a wide and open view of the Church for those approaching the church from the road (Church Pitch) to the south. A Public Right of Way crosses the area linking Church Pitch with the south-west corner of the churchyard. It also makes a significant contribution to the Church's setting. <u>It is considered that the issue of development upon the site should be determined in relation to the effect on the setting of the Church and the wider scenic qualities rather than rely on the designation of the site as Local Green Space.</u> '  Amend Goodrich Village Policies map to show the whole site at Church Pitch within the Local green space designation.	To correct an error and clarify the issues relating to any development on the area.
25	Policy GWB14	Revise first paragraph of the policy to read:  <b>'Sensitive infilling within settlement boundaries and on sites identified for development shown on Goodrich Village Policies Map <u>will be supported.</u>'</b>	On the advice of Herefordshire Council

26	Paragraph 8.5	Amend penultimate sentence to read:  'Proposals should not result in domestic clutter, <u>such as bins</u> , within the principal areas of the public realm.'	On the advice of Herefordshire Council
27	Policy GWB15	Amend the description of site c) to read 'south <u>east</u> ' of Goodrich Manor.  Add at end of policy:  <b><u>The design and layout of development within the sites should address the need to protect dwellings from the effects of noise and to ensure development fits sensitively into the landscape.</u></b>	To increase accuracy.  To ensure these important issues highlighted by Herefordshire Council are highlighted and addressed within the development.
28	Paragraph 8.14	Amend description of site to read:  'This site <u>now has planning permission</u> for 9 dwellings ( <u>approved in January 2018</u> ). Its location is similar to <u>that of</u> the Nutshell Caravan Park site. <u>Design requirements have been</u> addressed that <u>meet the requirements in relation to conserving the landscape of the Wye Valley AONB and the effects of noise.</u> '	To reflect the change in circumstances with the grant of planning permission
29	Policy GWB16	Amend second sentence of the introductory paragraph to read:  <b>'Provision should be made for the following needs <u>on appropriate sites</u> which have been identified:</b>	To reflect that not all the requirements can be met on each of the allocated sites.
30	Paragraph 8.17	Amend final sentence and add another two sentences to read:	To add clarity and address concerns

'A housing needs survey conducted in the course of consultation for the NDP enabled households to indicate whether they anticipated a housing need during the subsequent 5 years. 92% would be interested in 2 or 3-bedroom accommodation. The provision of affordable housing will be required on sites providing 11 or more houses although should developers choose to support these requirements on smaller sites, this would be welcome. Support would also be given to proposals that make available sites for self-build.'

expressed through the Regulation 14 consultation about compliance with the MPPF.

31 Paragraph A3.2

Amend first sentence to read:

To improve clarity.

'The Design Statement was prepared in 2010 and in the early stages of the NDP consultation parishioners were asked if the content remained valid and whether it should continue to be used to inform proposals.'

32 Appendix 4

Delete the Appendix.

This is no longer required.



# GOODRICH AND WELSH BICKNOR NEIGHBOURHOOD DEVELOPMENT PLAN

## MEETING ON HOUSING AND LAND FOR DEVELOPMENT

7.30 pm ON MONDAY 14TH AUGUST 2017 GOODRICH VILLAGE HALL

Following the well-attended meeting on 2nd August, this important meeting will develop the criteria for deciding where development should be potentially allowed in the parish.

Bill Bloxsome our Planning Consultant will be present. This represents the last phase before looking at the detail of potential site selection.

We will go on to consider the issues of:

**Settlements and settlement boundaries within which development may be allowed**

**The Green Spaces that should be preserved in and around the settlements**

*\* We will not, in this meeting, be looking at the list of sites submitted for development*

**Please contact Ken Gort on 1600 890106 for further information**

# Goodrich and Welsh Bicknor Parish Council

## Neighbourhood Development Plan

### Steering Group Meeting – Goodrich Village Hall – 14<sup>th</sup> August 2017 – Meeting Notes

**Members of SG Present:** Lawrie Lowe /Ken Gort / Janet Sheldon / Phil Dryden /Robin Hulse.

**Apologies** Chris Hulbert /Richard Barradale Smith

**In attendance** Bill Bloxsome: Data Orchard Planning Consultant

**With other Parishioners attending, a total of 17 were present.**

#### **1 Previous Minutes**

The minutes for the meetings of 28<sup>th</sup> June and 2<sup>nd</sup> August were approved.

#### **2 Site Selection Criteria**

Following on from the presentation Bill Bloxsome had given on 2<sup>nd</sup> August where he had shown how the selection criteria had been applied in other parishes, he presented and explained the criteria that Data Orchard used as a checklist when carrying out assessments.

This was a comprehensive list and Goodrich and Welsh Bicknor would need to decide which of these would need to be applied when assessing our NDP.

The Chairman stated that these will be discussed at the next SDP Meeting and that they would be then passed to Bill to allow the land offered for development in Goodrich to be assessed.

It was specifically noted that, in the planning regulations, 'large developments' in an AONB should only take place when there was a very strong need that could not be satisfied in any other way. However, what a large development would consist of was not defined in the regulations. See appendix 1 for the National Guidelines.

#### **3 Housing Needs Analysis and the Output of the Community Questionnaire**

##### **3.1 Housing Needs Analysis**

Janet Sheldon had covered the outcome of the Housing Needs Analysis at the last meeting (see minutes for 2<sup>nd</sup> August) and had now received information from Homepoint on the number of requests for social housing in Goodrich. She reported that there were 5 applications that had Goodrich as their first choice, though more may have registered putting Goodrich as a second or third choice. This finding underpinned what the Questionnaire had been telling us about real demand.

As stated at the last meeting, the request for affordable housing presented a dilemma as a planning condition for affordable housing will only be forced on a developer when building sites of 11 or more dwellings. (A set of 11 houses forces the building of one 'affordable house').

In the main Community Questionnaire, 75% of households in the Parish thought that development sites of up to 4 dwellings were appropriate with 61% opposing sites of between 5 and 15 houses and 83% opposing sites of over 15 houses.

The Community Questionnaire was therefore at odds with the Housing Needs Analysis, the preferred size of sites being almost certainly too small for smaller houses were to be built

##### **3.2 Development boundaries**

One other issue was whether there should be development boundaries around the housing areas in Goodrich and if so whether this should apply just to those which had previously had boundaries under the old UDP or whether other areas – Old Forge or Goodrich Cross/Dean Swift Close which were previously considered open countryside where development was prohibited should now have boundaries. Alternatively, there could be no boundaries and developers could buy land and apply to build anywhere.



## Appendix 1

### National Planning Policy Framework

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6077/2116950.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf)

Comments on Development in AONBs.

Herefordshire's policy is based on the national Guidelines

Para 114. Local planning authorities should:

- set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure; and
- maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast, and improve public access to and enjoyment of the coast.

115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and **Areas of Outstanding Natural Beauty**, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important and should be given great weight in National Parks and the Broads.

116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.

Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

## Appendix 2 - XX Neighbourhood Plan - Assessment Criteria

Site name .....

No	Criterion	Adverse effect Y/N	Can be mitigated Y/N	Can achieve benefits Y/N
1	Effect on Environmental Designations – esp. SSSIs; Scheduled Monuments			
2	Is/Is not major development			
3	Within or adjacent to the built-up area of the settlement			
4	Fit sensitively into the setting and character of the settlement.			
5	Natural Environment			
6	Built and Historic Environment			
7	Landscape Character and Appearance			
8	Effect on General Residential Amenity			
9	No adverse pollution effects on residential amenity			
10	Sewage treatment			
11	Other infrastructure			
12	Land drainage/Flooding			
13	Greenfield/Brownfield/Agricultural Land Quality			
14	Contaminated land			
15	Energy conservation potential			
16	Support parish/community facilities/core/centre			
17	Effect on use of facilities			
18	Meeting on-site space provision			
19	Safe vehicular access			
20	Effect on highway network			
21	Improvements to footpath/cycle network			
22	Enable appropriate traffic calming in effective locations			
23	Effect of traffic on residential amenity			
24	Estimated number of dwellings contributing to target			
25	Provide the appropriate range of market housing			
26	Provide the appropriate range of affordable housing			
27	Maintain a strategic gap between population centres			