

## **Whitchurch and Ganerew Group Parish Neighbourhood Plan Examination**

### **Note and questions of clarification from the Examiner to the Group Parish Council and HC**

Having completed my initial review of the Neighbourhood Plan (the Plan), I would be grateful if both Councils could kindly assist me as appropriate in answering the following questions which either relate to matters of fact or are areas in which I seek clarification or further information. Please do not send or direct me to evidence that is not already publicly available.

#### ***Note from the examiner for consideration***

1. A settlement boundary has been defined for Symonds Yat West (Policies WG2 and WG5). Whilst I note the settlement is identified in Table 4.15 of the Core Strategy as a settlement where proportionate housing is appropriate, it falls in an Area of Outstanding Natural Beauty (AONB). National policy is clear that within AONBs, great weight should be given to conserving and enhancing landscape and scenic beauty as such areas have the highest status of protection. The scale and extent of development should be limited.

The Core Strategy also allows flexibility where more than one settlement is identified in Tables 4.14 and 4.15 as in this case as Whitchurch is also identified in 4.14.

I understand that the Group Parish has already met its housing target (albeit this is a minimum figure); is this correct? I would be grateful for clarification on the latest available figures.

The settlement's nature and character is such that it is arguably difficult to write a policy that would only permit what might be considered to be limited and acceptable development.

I am therefore concerned that defining a boundary for Symonds Yat West is not necessary or desirable and may inadvertently result in far more development than is envisaged. As a consequence, I am considering whether this should be deleted from the Plan.

I would be grateful for any comments on these thoughts (which are given informally and without prejudice).

The NDP Steering Group was aware that you could choose to promote sites to meet the required level of proportional housing growth within one of the two named settlements rather than divide between both and this was what was advocated within the NDP. Notwithstanding that there were no sites submitted for Symonds Yat West that would amount to allocations within the terms indicated in Planning Practice Guidance, the Steering Group did not consider looking to promote any allocations there, as can be seen in paragraph 5.1.1.

The NDP Steering Group did consider the policy options it might pursue for Symonds Yat West within the NDP. As background to its consideration it recognised:

- That Symonds Yat West is identified as a settlement within Herefordshire Local Plan Core Strategy to which policy RA2 applies (To decide otherwise is not possible within the remit of the NDP). Although Table 4.15 suggests that it might take proportional growth, policy RA2 makes no such differentiation. The only differentiation appears to be 'proposals will be expected to demonstrate particular attention to the form, layout, character and setting of the site and its location in that settlement'. (Although there is reference to 'contributes to or is essential to the social well-being of the settlement

concerned', it was uncertain how this might be considered).

- To be silent in relation to Symonds Yat West within the NDP would defer to Herefordshire Local Plan Core Strategy policy RA2 and the experience is such that, given there has been no previous settlement boundary for the settlement and its spread-out nature, HC would likely interpret 'within or adjacent' widely and far beyond the proposed boundary (as witnessed in relation to planning permissions granted under codes P174508/O and P174346/O which are well outside the original and proposed Whitchurch settlement boundary. This might lead to an even greater likelihood of an even higher level of development and even lead to the merging of Symonds Yat West with Whitchurch.
- To develop a criteria-based policy in the NDP without defining a boundary would likely have the same effect as it is difficult to be sufficiently specific.
- It is questioned whether, given Core Strategy policy RA2, it would be tenable to include a policy that says no further development at Symonds Yat West.
- Notwithstanding what development looks like on a map, having walked and reviewed the area, it is difficult to suggest a different (smaller) settlement boundary.

As a consequence it was felt to define a settlement boundary but with strict conditions as set out in policies WG2 and WG5, together with other NDP, Core Strategy and NPPF policies, including those that protect the AONB, Sites of Special Scientific Interest/Special Area of Conservation, Landscape Character, local and national heritage assets, flood risk and the effects of development on the capacity of the local highway network which is extremely limited in this location, these should provide sufficient safeguards to protect the area from a significant levels of development. Criteria protecting the character of the settlement and reference to the narrow network of roads have specifically been included in policy WG5 and should limit the scale of development.

The SG and PC were conscious that NDPs should plan positively for development and consequently the NDP needed polices that also supported responses to the NDP questionnaire, providing the opportunity for the Parish Council to support future sustainable development whilst remaining compliant with the Core Strategy.

The defined boundary for Symonds Yat West was considered very carefully during its preparation and takes account of the following:

- The area of the settlement boundary is restricted on its eastern flank by the River Wye flood plain, where future residential development would be inappropriate if not impossible!
- The area of the settlement boundary is restricted on its western flank by the steeper slopes of the hillside of Great Doward.
- Many of the roads, lanes and tracks in the area are Byways Open to All Traffic (BOATS) and the road infrastructure is inappropriate to support further residential traffic. This has recently been recognised by the fact that residential planning applications have been refused by the planning authority for that reason.
- The relatively narrow strip of land of the settlement boundary offers a very limited area for residential development. In answer to the Examiner's concern about "inadvertently resulting in more development than envisaged" there is not the capacity for significant development for the reasons outlined above.
- The status of the settlement of Symonds Yat West as an important part of the "Birthplace of English Tourism" and as a significant part of the population of the group parish, has been recognised by the responses from parishioners and from Herefordshire Council.

- The status of being a part of an Area of Outstanding Natural Beauty is recognised and lauded by parishioners and as can be seen from the detailed work identified in the Draft Neighbourhood Plan, every effort has been made to support that and to protect the SSSIs and the heritage elements and vistas contained within the settlement boundary.
- Any residential developments proposed will be subject to rigorous examination to ensure appropriateness both at Parish Council and at County Council level.

The PC's records indicate 53 dwellings either built or had planning permission between 2011 and December 2017. Since that date planning permissions for a further 23 dwellings have been granted.

(NB the figure of 55 in Table 1 of the Regulation 16 draft NDP is an updated one taking into account 2 dwellings granted pp subsequently although paragraph 3.2.1 was not amended to reflect this.)

Herefordshire Council is best placed to update the actual figures for 2011 to 2019 (April) so that any that have become out-of-time can be taken into account. Since April 2019 planning permission providing 5 dwellings has been granted.

If it is proposed to delete the settlement boundary, some policy requirement may be required or the situation set out under bullet 2 above will apply and in such an instance an even greater level of development may result.

***Questions of clarification where further information is sought***

2. Please confirm the date the Plan was submitted to HC.

16<sup>th</sup> January 2019

3. Please confirm whether the Group Parish has been given an opportunity to make any comments on all or any of the representations received at Regulation 16 stage and if so, send me a copy of any comments made or confirm that no comments has been made.

Yes, and a copy of responses is attached at Appendix 1.

4. In relation to the settlement boundary for Whitchurch (policies WG2 and WG3), three matters arise:

- a. A representation suggests that additional land to the rear of Old Court Hotel should be included. I would welcome your comments on this. This may already be part of any comments submitted on Regulation 16 representations of course.

This has been responded to in Appendix 1. It should also be noted that a planning application to develop this area has been submitted to which Herefordshire Council's Environmental Health (Noise) section has submitted an objection on the basis of NPPF paras 180 and 182. This reflects the concerns of the PC which would not like to see development that would adversely affect the business at the Old Court Hotel which is an important Listed Building that would potentially be at risk should its ability to maintain a viable use be affected.

- b. I consider that the car wash/car park/ Jo's Place 'island' site in between the Old Ross Road and the A40 could potentially be included in the settlement boundary. Why was it excluded?

Inclusion within the settlement boundary would suggest it has potential for housing development. The site is of sufficient size to be a housing allocation but was not indicated to be available through the 'Call for Sites'. Notwithstanding this, its location immediately adjacent to the A40 dual carriageway would result in an extremely poor quality of residential amenity through noise and air pollution. Knowledge about similarly located sites elsewhere indicates Herefordshire Council's Environmental Health (Noise) Officer would object to such a site, especially as other sites without such a problem are available. The property has existed there for many years and previous local plans have not included it within any settlement boundary. (See Herefordshire UDP map for Whitchurch – Appendix 2). The Examiner may wish to note that a planning application for 10 dwellings upon this site was refused in October 2013 under code P131930/O. This included a direction from Highways England as well as a reason indicating that the development would result in substandard and inadequate amenity. There was also a need to address potential contaminated land risks because of proximity to a former commercial landfill site where there may be petrochemical residues.

The premises contain a local business and the retention of such accommodation should be maintained to support the rural economy. This was another reason for refusal of the planning application referred to above. In this regard the site is more closely associated with the area comprising the commercial buildings associated with The Old Ross Road and The Forge (Policy WG10). This is clearly evident from the map at Appendix 2.

- c. I consider the dwelling adjacent to the primary school might potentially be added to the settlement boundary. Why was this property excluded?

This dwelling was granted planning permission under code DS031009/F as a 'proposed new farmhouse'. Unfortunately, there are no background details on HC's website and it is possible that it is an agricultural dwelling associated with then large agricultural buildings to the north (See Appendix 3) and with an agricultural occupancy condition. The Examiner may wish to note that a planning application for 7 dwellings on this site under code P133357/F was withdrawn by the applicant following objections from HC's highways department, its landscape officer and the Environment Agency (flood risk). Should this be included, its eastern boundary needs to be considered carefully in relation to the adjacent commercial operation which its full curtilage borders.

5. Are there any assessment/evidence documents in the public domain relating to the definition of the settlement boundaries for Whitchurch and Symonds Yat West? If so, please send me a copy or link.

Document attached separately (paras 5.7 and 5.8). It has been available of the NDP website since the beginning of the Regulation 14 consultation stage at:  
[http://www.wagpcnp.org.uk/documents/The%20Plan/180112\\_Housing%20and%20Assessment%20Report\\_for%20Reg.%2014.pdf.pdf](http://www.wagpcnp.org.uk/documents/The%20Plan/180112_Housing%20and%20Assessment%20Report_for%20Reg.%2014.pdf.pdf)

6. The proposed site allocation (Policies WG3 and WG4), land adjacent to Yew Tree Close, seems to rely on access through the committed site. Please send me brief details of the permission for the committed site including a site/layout plan and comment on this issue. What work has been done to look at both sites holistically? Has the land owner(s) confirmed access is available for the allocation? Is the land within the same ownership?

Planning permission Code P163068/F was granted on 20 March 2017 and development has yet to commence. The land is in the same ownership as that proposed in policy WG4. The NDP Steering Group had a number of discussions with the owner following the site assessment to determine its availability. It was (as a much larger area) submitted through the Call for Sites and availability confirmed during subsequent discussions. The approved layout for the part with planning permission is shown at Appendix 4. As development has yet to start then a new arrangement is possible.

7. The Environment Agency has raised concern in relation to Policy WG9. I would welcome your comments on this and any suggestions on how to overcome the concern.

This is covered under Representation 2 in Appendix 1.

It may be the case that on receipt of your anticipated assistance on these matters that I may need to ask for further clarification or that further queries will occur as the examination progresses. Please note that this list of clarification questions is a public document and that your answers will also be in the public domain. Both my questions and your responses should be placed on the Councils' websites as appropriate.

With many thanks.

Ann Skippers  
Independent examiner  
1 August 2019

## **APPENDIX 1**

### **Whitchurch and Ganarew Group Parish Neighbourhood Development Plan**

#### **Whitchurch and Ganarew GPC response to representations made at the Regulation 16 Stage, March 2019**

**(NB The representations listed are only those to which a response is considered necessary)**

## Whitchurch and Ganarew Group Parish NPD: Overview

### **Background**

There are a number of major constraints affecting the Group Parish:

1. Most of the Group Parish lies within the Wye valley AONB.
2. The River Wye within the Group Parish is a Special Area of Conservation as well as an SSSI.
3. The River Wye has an extensive flood-plain that places limits upon some development in most of the area to the east of the A40 and B4164.
4. A large part of the Group Parish comprises sloping land that is also of considerable landscape importance.
5. The A40 is a major trunk road running through the Group Parish, restricting development through providing a physical barrier, and constraints in terms of highway safety, noise and pollution.
6. Away from the A40 most roads are narrow lanes where passing is only possible in places.

In combination, these restrict locations where development may be undertaken adjacent to the two settlements.

Unlike many if not all rural parishes within the Wye valley AONB, Whitchurch and Ganarew Group parish contains a number of concentrations of employment areas. This development, in places, gives the impression of having taken place in an ad-hoc manner, especially adjacent to the River Wye in the area where tourism facilities have been provided. A need to provide some degree of control over such development is seen as important in terms of achieving employment benefits while protecting the 2 major environmental considerations of the AONB and River Wye.

### **Update**

Since the NDP was submitted under Regulation 15, two planning permissions have been granted which in combination provide a further 15 dwellings (Codes P174346/O and P174508/O. Hence the number of completions and planning commitments now provide for 70 dwellings, in excess of the required minimum level of proportional housing growth of 65 dwellings.

### **Representations**

A number of representations received either support or are neutral in their comments and no comment is made in response. The Group Parish Council is, however, grateful for the organisations concerned in providing a response. They include:

- The Coal Authority
- Dwr Cymru – Welsh Water
- Historic England
- National Grid
- Herefordshire Council Environmental Health and Trading Standards (S Burrage)
- Natural England

Ref	Representation By	Summary of Representation	Response
1	A Turner, Herefordshire Council Environmental Health (Air, Land and Water Protection)	<p><u>Policy WG11: Use of rural buildings</u></p> <p>Some farm buildings may be used for the storage of potentially contaminative substances (oils, herbicides, pesticides) or for the maintenance and repair of vehicles and machinery. As such it is possible that unforeseen contamination may be present on the site. Consideration should be given to the possibility of encountering contamination on the site as a result of its former uses and specialist advice be sought should any be encountered during the development.</p> <p><u>General comments:</u> 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.</p> <p>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.</p>	Both these representations were responded to at the Regulation 14 stage (see representation S1 under 'Whole Plan' and WG11). Policy WG8(e) covers the issue of contaminated land.

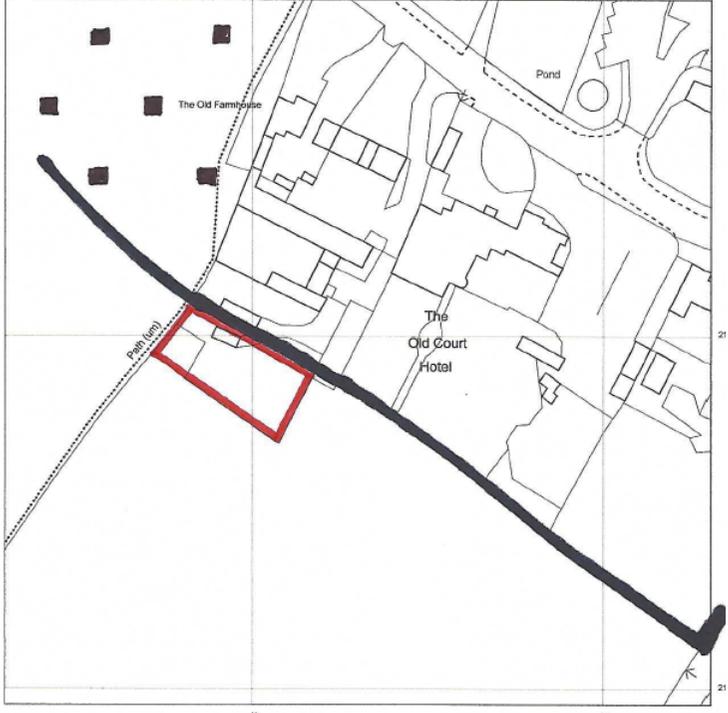
		<p>Finally it is also worth bearing in mind that the NPPF makes clear that the developer and/or landowner is responsible for securing safe development where a site is affected by contamination.</p> <p>These comments are provided on the basis that any other developments would be subject to application through the normal planning process.</p>	
2	G Irwin Environment Agency	<p>As part of the adopted Herefordshire Council Core Strategy updates were made to both the Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS). This evidence base ensured that the proposed development in Hereford City, and other strategic sites (Market Towns), was viable and achievable. The updated evidence base did not extend to Rural Parishes at the NP level so it is important that these subsequent plans offer robust confirmation that development, including camping and caravan proposals, is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period.</p> <p>The submitted Environmental Report (January 2019) also makes reference to the SFRA and need for up-to-date flood risk information to ensure that any flood risk issues are considered when preparing the Whitchurch and Ganarew Group NDP.</p> <p>We previously raised concerns at the Regulation 14 stage with regards Policy WG9 and requested further clarification and greater consideration of flood matters and the associated evidence base. No such evidence has been provided to inform the NP's soundness and deliverability and we therefore raise concerns on this basis in relation to the justification of the NP. Whilst the NP does include a flood risk policy (WG17) this should not be to support an allocation within an area of high flood risk</p>	<p>The issue has been addressed through policy WG17, to which changes were made following representations made at the Regulation 14 stage (see change No 25 within the Schedule 2 – Schedule of Alterations within the Consultation Statement). The NDP must be read as a whole and not simply as a set of individual proposals. Paragraph 7.2.2 (following policy WG9) makes specific reference to the need to take into account policy WG17 in relation to tourism and visitor facilities in the area adjacent to the River Wye. There is a need to guide development in this area rather than rely upon the rather 'ad-hoc' approach that appears to have resulted in the past.</p> <p>By definition, the NPPF indicates that NDP policies are not strategic such that they should be informed by SFRAs. However, this should not avoid the need for flooding to be considered, which is the purpose of policy WG17. Policy WG17 refers to the need to use the sequential and exception tests in accordance with NPPF(2018) paragraph 157. Applicants will need to submit site specific flood risk assessments in accordance with NPPF(2018) paragraph 160 in order to comply with policy WG17.</p> <p>Policy WG9 is not an allocation but a boundary within which a policy applies in order to better regulate forms of</p>

	<p>without a robust flood risk evidence base. Development in the area should accord with the Policy but, in the absence of a detailed flood risk assessment, this may not be achievable or deliverable.</p> <p>As previously stated the land adjacent to the River Wye (WG9) is allocated to support, or continue to support, 'tourism and visitor facilities and related intensification and regeneration'. The area of land lies predominantly within Flood Zone 3, the high risk Zone based on our Flood Map for Planning, and likely to be partially 3b functional floodplain where only water compatible development is supported (NPPG Table 3, Paragraph 067 refers). Since the Regulation 14 submission a line has been added to the Policy Justification (Para 7.2.2) stating "some of the area falls within the area at risk of flooding and consequently regard will need to be had to NDP Policy WG17". Whilst we welcome the inclusion of the Policy WG17 the function of such is to steer windfall sites to the areas of lowest flood risk and to consider flood risk. It is not to support the intensification and regeneration of an area within Flood Zone 3 and potentially the functional flood plain. We would again seek clarification around this Policy and whether new built development in an area of high flood risk is being sought. With reference to NPPG Paragraph 066 camping and caravan sites are classed as 'more vulnerable' or 'highly vulnerable' dependent upon whether it is short-let or permanent residential use. The NP is unclear on the scale and nature of tourism and visitor facilities and the related intensification and regeneration. Introducing further users, including more and highly vulnerable, into an area of high risk should not be supported without robust evidence to demonstrate that it will be safe and will not increase risk to third parties. Should the aspiration be to support further development of 'more' and 'highly vulnerable' uses,</p>	<p>development and supplement the more general and site-unspecific Herefordshire Local Plan Core Strategy Policy E4 in an area where such development has been permitted in the past. Outside of this area it would not be expected that such development would be permitted in order to protect the environment and amenity, and to avoid uses sprawling out even further beyond the current concentration. There is no strategic requirement to provide for such uses within the Group Parish and the issues of available, achievable and suitable are not relevant.</p> <p>The area already contains land used for touring caravans and camping. Should further proposals for these uses come forward within the boundary shown these will need to be considered in relation to the sequential and exception tests, as well as other elements of the policy. Other potential visitor facilities may not fall into the 'more' and 'highly' vulnerable categories, for example, a canoe launch (subject to meeting all relevant criteria).</p> <p>The inclusion of reference to policy WG17, although not strictly necessary, would not be objected to should the Examiner consider this appropriate or beneficial.</p> <p>The test for NDPs is not one of 'soundness' but compliance with 'basic conditions'. In this regard it is considered that as a whole in so far as relates to the area covered by policy WG9, the NDP as a whole meets the basic conditions.</p>
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		<p>such as camping and caravan, as part of Policy WG9 we would expect greater consideration of flood risk matters and associated evidence base. As stated above Herefordshire Councils Strategic Flood Risk Assessment does not currently extend to rural parishes, although it is understood that further work is being undertaken in that regard. The Councils internal drainage team may have Level 1 SFRA information which could be utilised in this instance. In consideration of the above we would expect flood risk to form a key part of this Policy to ensure that any development is safe and will not increase flooding to third party land or properties, taking into account climate change. In the absence of the above we would raise soundness concerns on the Plan, as submitted. I trust the above clarifies our position and is of assistance at this time. Please note that further discussion, outside of the formal statutory consultation process, is subject to our Cost Recovery Service.</p>	
3	Mr and Mrs E Gee	<p>My clients also <b>support</b> Policy WG3 (i) (page 29) which supports the erection of self-build dwellings on the edge of settlement boundaries where initial owners have primary input into the final design and layout of the proposal. This policy incorporates a reasonable degree of flexibility to support this particular form of housing development. However, my clients <b>object</b> the exclusion of some of their land from the draft settlement boundary as shown on the 'Whitchurch village policies map' (see OS Extract for the subject land outlined in red).</p> <p>Paragraph 6.2.1 of the draft NDP (page 29) advocates the criteria of Herefordshire Council's Guidance Note 20 'Settlement Boundaries' is applied to arrive at the settlement boundary.(see copy attached). My clients support the application of these objective criteria to arrive at an appropriate delineation of the settlement boundary. If judged against these</p>	<p>This area was proposed for housing in the Regulation 14 draft NDP. However, objections were received that were given full and proper consideration as set out in Appendix 1 to the Schedule of Representations in response to draft plan, October 2018 (see Consultation Statement).</p> <p>Of particular concern was that although the site was not within the area prone to flooding, the access to it was. As such this raised a high level of uncertainty such that it could not be shown that the site was deliverable. In addition, significant weight was given to the need to support the viability of The Old Court Hotel, an important Listed Building for which the current use needs to be supported for its long-term benefit.</p> <p>As a consequence of these concerns, it was considered that the site should not be advanced as a housing allocation. In</p>



	<p>Policy Framework. In particular paragraph 118 of the Framework requires planning policies, amongst other things, should: “...give substantial weight to the value of using suitable brownfield land within settlements for homes...” (point ‘c’) and “..promote and support the development of under-utilised land and buildings ...” (point ‘d’). Further, paragraph 121 of the Framework requires planning authorities to take a positive approach to proposals for alternative uses of land which is currently developed but not allocated for a specific purpose in plans. This is of direct relevance to my clients’ site.</p> <p>The inclusion of the site within the settlement boundary would ensure that the draft NDP complies fully with Herefordshire Council’s settlement boundary criteria which the NDP advocates should be adopted. It would also accord with national planning policy relating to the re-use of brownfield land. It will also help achieve its objective to achieve sustainable development as defined in national planning policy and Policy WG1 of the NDP.</p> <p>For these reasons, my clients ask that the draft settlement boundary as shown on the Whitchurch Village Proposal plan is amended to include their area of brownfield land identified on the attached OS Extract.</p>	
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4	Herefordshire Council (Strategic Planning Team)	<p><u>Policy WG2 (Development Strategy)</u></p> <p>Use of the word 'limited' when referring to new housing/ expansion of employment areas could be interpreted as adopting a negative approach to planning growth, which does not completely align with the approach taken by the Core Strategy. Suggested replacement would be 'proportionate' or 'appropriate'.</p> <p><u>Policy WG3 (Housing Development in Whitchurch)</u></p>	<p>The only reference to 'limited' in the policy is in relation to the expansion of industrial sites. These sites are not located within either of the Group Parish's settlements and hence this reference reflects the fact that the sites currently fall within the Wye Valley AONB where major development should be refused. HCS emphasises the need for proposals to be of an appropriate scale (Policy RA6 bullet 3).</p>

	<p>Some clarity may be required here to ensure compliance with the Core Strategy. If the final criteria relating to development outside of the settlement boundary is referring to development immediately adjacent to the settlement boundary, then this needs to be made clearer. Any other form of development would be classed s countryside, and therefore any development will be restricted to that complying with criteria of Core Strategy policies RA3, RA4 and RA5.</p> <p><u>Policy WG4 (Housing Site in Whitchurch)</u></p> <p>Taking into account the concerns raised in the 2012 SHLAA over access to Llangrove Road, the deliverability of this site would appear to be dependent on achieveing an access through the existing committed site to the north.. Looking atb the approved layout for this, this might be challenging.</p> <p><u>Policy WG5 (Housing Developmenbt at Symonds Yat West)</u></p> <p>Restoration of existing buildings/premises: The buildings/premises in question should be capable of conversion</p>	<p>The policy provides for two forms of housing outside of the settlement boundary on the edge of Whitchurch. The first promotes self-build opportunities on its edge. The refence to edge recognises that there are constraints that may rule out such sites immediately adjacent to its boundary (flooding, highway safety, noise and pollution arising from the A40 in particular). The policy also promotes affordable housing schemes where a need is proven outside of the settlement boundary. This accords with HCS Policy H2. That policy indicates that the location of such sites should offer reasonable access to a range of services and facilities.</p> <p>In both instances Whitchurch is the most sustainable location in this regard and consequently is the location promoted for such development.</p> <p>In assessing the site, the granting of planning permission after the SHLAA (2012) was published upon part of this site was seen as a recognition that the initial assessment had been changed in relation tom access onto Llangrove Road. No objection was received to this site at the Regulation 14 stage from HC’s Transportation Section. The permission granted has yet to be implemented. Discussions were held with the landowner who agreed that the site might be enlarged to that proposed in the NDP.</p> <p>This policy refers to such building inside the settlement boundary and not outside within the open countryside to which it is understood HCS policy RA5 applies. This policy</p>
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	<p>without major or complete reconstruction, in accordance with policy RA5.</p> <p><u>Policy WG11 (Use of Rural Buildings)</u></p> <p>Point d): To accord with Core Strategy Policy RA5 the proposed new use for rural buildings should be capable of being accommodated without the need for ancillary buildings that individually or taken together would adversely affect the character/appearance of the building or setting/surroundings.</p> <p><u>Policy WG15 (Enhancement of the Natural Environment)</u></p> <p><i>'the loss of features, where absolutely necessary, shall be offset through full compensatory measures'</i>. This would apply more specifically to development that would lead to a reduction in the coherence and effectiveness of the ecological network. LD2 sets out further exception criteria based on the level at which biodiversity and geodiversity assets are designated.</p> <p><u>Policy WG16 (Protecting Heritage Assets)</u></p>	<p>falls within the remit of HCS policy RA2 and recognises the particular historic development of the settlement as explained in the NDP.</p> <p>This policy is based upon the combination of HCS policies RA5, RA6 and E1 and reflects a number of proposals that have been permitted by Herefordshire Council and its predecessor authorities enabling, in particular, country houses to be used for business and employment uses. It should be noted that in the past these were a source of local employment. Development at Wyastone Leys is an example within the Group Parish and there are numerous others. The policy refers to extensions being limited so that they are of an appropriate scale.</p> <p>The part of policy WG15 that refers to protection the natural environment refers specifically to HCS policies LD2 and SD3 in order to cover the hierarchy of protections and does not seek to go beyond these. Its key purpose is to promote enhancements and compensatory measures. In relation to the latter, it is noted that Government is consulting upon using the planning system to achieve net gains in biodiversity and consequently to seek full compensatory measures appears reasonable as a minimum and in line with its approach.</p> <p><a href="https://consult.defra.gov.uk/land-use/net-gain/supporting_documents/netgainconsultationdocument.pdf">https://consult.defra.gov.uk/land-use/net-gain/supporting_documents/netgainconsultationdocument.pdf</a></p> <p>This is a policy specifically referring to Historic Farmsteads, which Historic England requested be considered within HCS</p>
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		<p><i>"...in order to comply with Herefordshire Local Plan Core Strategy policy RA3(6)." This must also comply with policy RA5.</i></p> <p><u>Policy WG20 (Traffic Measures within the Parish)</u>          These measures can be sought insofar as is within the scope of land-use development plan, and contributions yielded from new development.</p>	<p>but was not pursued in that plan. Herefordshire Council undertook a Historic Farmstead Characterisation Project and information in relation to this is available to inform the conservation and development of such assets. It is referred to within Annex papers to the Schedule of Regulation 14 Representations and noted that advice was received about such guidance from the Council's Historic Buildings Officer. The reference to policy RA3(6) is in relation to new build in that ability. It is also noted that NPPF (2018) para 79 also now makes reference to <i>'development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets.'</i> This policy seeks to promote the combination in order to support such heritage assets within the AONB.</p> <p>This policy is similar, but Group Parish specific, to the 4<sup>th</sup> paragraph in HCS policy SS4.</p>
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# APPENDIX 2 – Extract from Herefordshire UDP for Whitchurch



### Appendix 3: Dwelling adjacent to the Primary School







## Whitchurch and Ganarew Neighbourhood Plan

### Housing Report

#### 1. Introduction

This report describes arrangements taken to identify where housing development should take place through the Neighbourhood Plan and covers: -

- The “Call for Sites”.
- The assessment of land submitted through the Call for Sites
- Identification, assessment and housing allocations
- Defining the settlement boundaries
- Completion of the final allocation of dwellings to settlement boundaries.

A key requirement for a sustainable Neighbourhood Plan is to satisfy the core requirements of Herefordshire Local Plan Core Strategy to provide a minimum of 65 dwellings, while taking due account of parishioner wishes for the environmental, culture and heritage of the parish. At the time of completing this report some 53 new dwellings had been either constructed or had outstanding planning permissions, leaving a residue of a minimum 12 new dwellings to be found.

#### 2. Approach

The following activities describe the tasks undertaken to complete the “Call for Sites” through to final allocation of sites and settlement boundaries. The Neighbourhood Plan must be able to withstand formal evaluation by an external Examiner and Herefordshire Council and be acceptable to the majority of parishioners.

The time line below lists the order, description and timing of all the activities completed to satisfy Neighbourhood Plan requirements and satisfy parishioner wishes, assessed from analysis of questionnaires and feedback from public consultation.

#### 3. Time line

Step / Activity	Description	Start Date	End Date
1	Initiate the Call for Sites	July 2016	September 2016
2	Collate Call for Sites responses – See Map 1 (NB – There are gaps in the sequential numbering reflecting the fact that some submissions did not contain any site or other details but were recorded as having been received)	September 2016	January 2017
3	Complete a desk top review of sites submitted	November 2016	January 2017
4	Carry out assessment of appropriate sites submitted	January 2017	March 2017



5	Evaluate site assessments to establish draft proposals for housing allocations and settlement boundaries.	January 2017	June 2017
6	On-going assessments of sites and settlement boundaries: <ul style="list-style-type: none"> <li>- Meetings with Hereford County Council</li> <li>- Meetings with landowners/developers of sites representing reasonable alternatives</li> <li>- Draft evaluations</li> </ul>	March 2017	June 2017
7	Undertake a review of outstanding allocations to achieve core strategy minimum of 65 new dwellings.	June 2017	September 2017
8	Final evaluation and production of this report.	September 2017	January 2018

#### 4. Assessment Criteria

<p><b>Suitability</b></p> <p>Describes whether the site meets a range of critical criteria including topography, to assure the site's development fits with landscape, countryside, scenery and other important considerations. This is of particular importance to a parish with such diversity of scenery and designated an Area of Outstanding Beauty (AONB) the River Wye Special Area of Conservation (SAC), together with Sites of Special Scientific Interest. Further considerations that assist in differentiating between sites include: proximity to services, community facilities, shops, school, transportation, recreational areas and local employment areas e.g. industrial estates and local businesses.</p>
<p><b>Achievement and Availability</b></p> <p><b>Achievability</b> describes the viability of the proposed site and assesses the level of practicality for construction of dwellings on the land submitted.</p> <p><b>Availability</b> identifies that sites submitted are deemed to be available and it also needs to consider the potential level of any third-party legal constraints to future progress.</p>
<p><b>Alignment</b></p> <p>Describes alignment of the proposed site to parishioner feedback and to Whitchurch and Ganarew Neighbourhood Plan Policies and Objectives taken forward which includes that from public consultation meetings and a Neighbourhood Plan questionnaire. Of significant importance within this is the desire by residents to try to accommodate the required level of housing upon small sites, consistent with the requirement to protect the landscape of the Wye Valley AONB.</p>
<p><b>Concluding Assessment</b></p> <p>For sites considered reasonable alternatives, a summary has been prepared to show how parishioner feedback and other considerations of suitability, achievability and availability have resulted in a decision whether or not to allocate a site for housing development within Whitchurch and Ganarew Neighbourhood Plan. <b>N.B.</b> an initial trawl was undertaken to remove sites that had received planning permission or did not comply with Herefordshire's Core Strategy Policy RA2.</p>



## 5. Call for Sites Detailed Assessments

- 5.1 An initial trawl of sites submitted was undertaken to identify those sites that would not represent reasonable alternatives because they fell in open countryside and not within the terms of Herefordshire Local Plan Core Strategy Policy RA2 (see Appendix 1, Page 10). This does not mean that planning permission would not be granted, but these sites would normally be considered under Core Strategy policy RA3 and outside of the NDP process. These sites are identified in Table 1.
- 5.2 During the process of assessing sites and preparing the draft NDP, 8 sites submitted received planning permission and/or were built. These are listed in Table 2.
- 5.3 For completion of the required allocation, houses built from 2011 and sites with planning permission outside the “call for sites” arrangements and included as commitments, are listed in Table 4.

**Table 1: Site Submissions not falling within Herefordshire Local Plan Core Strategy Policy RA2 (15 sites)**

Site Number /Description	Approximate Plot Size
01 – The Green	- 0.16 hectare
02 – Rock Cottage	- 0.2 hectare
03a – Sandyway Lane	- 2.5 hectare
08 – Crockers Ash	- 0.5 hectare
11 – Ganarew, Near Sellarsbrook	- .3 hectare
12 – Ganarew, South	- 1.3 hectare
13 - Grey Gables, Old Ross Road, Whitchurch.	- 1.0 hectare
15a – Delburne Farm, Whitchurch	- 3.7 hectare
15b – Rear of Daff y Nant House	- 1.2 hectare
20 – Well Vale Lane, Crockers Ash	- 2.0 hectare
21a – Land to the West of Elmstead	- 0.5 hectare
21b – Land to the East of Elmstead	- 0.5 hectare
34 – Stony Cottage, Well Vale Lane, Crocker’s Ash	- 0.15 hectare.
35 – Lilac Cottage, Little Doward	- 0.2 hectare.



Site Number /Description	Approximate Plot Size
36 – Daff y Nant Bungalow	- 2.5 hectare

**Table 2: Submitted sites built and/or having received planning permission and now counted within commitments (8 sites)**

Site Number /Description	Notes	No of Dwellings	Running Total
22 – The Old Nurseries, Crockers Ash	- Plot size 1.0 hectare. <b>Planning permission granted - Application No. P163303/F.</b>	6	6
23 – Stone Eaves, Old Ross Road	- Plot size 0.4 hectare. <b>Site developed - Application No. P130184/F.</b>	1	7
26 – High Croft, Wye View Lane	Plot size 0.16 hectare. <b>Site development progressing - Application No. S120127/F</b> <b>Replacement property, zero impact</b>	0	7
27 – Site Opposite the Primary School, Whitchurch	- Plot size 0.2 hectare. <b>Planning permission granted - Application No. P171044/F</b>	3	10
28 - Old Court Hotel new house.	- <b>Property is completed</b> <b>Detailed planning permission granted - Application No. P150263/F</b>	1	11
29 - Marsden House, Whitchurch	<b>Detailed planning permission granted - Application No. P143823/F</b> (conversion proposal for 12 – less one for original use)	11	22
30 – Mill House, Old Monmouth Road	- Plot size 0.1 hectare. <b>Site developed – Application No. S121610/F</b>	4	26
31a – Llangrove Road (adjacent to Yew Tree Close), Whitchurch. Phase 1.	Plot size 0.99 hectare. <b>Planning permission granted – Application No. P163068/F</b>	9	35

5.4 The remaining 7 sites identified from the “Call for Sites” (Sites 04, 06, 19, 24, 31b, 32 and 33) were then subjected to closer analysis to determine whether they might contribute towards the additional houses required to ensure the required minimum level of 65. The criteria listed in Section 4 of this report were used for this purpose. A complete list of all “Call for Site” assessments plus a later, more comprehensive, assessment of the remaining



7 Call for Site (Sites 04, 06, 19, 24, 31b 32 and 33) are detailed on the Neighbourhood Plan website [www.wagpcnp.org.uk](http://www.wagpcnp.org.uk).

5.5 Of the 7 sites, five were considered to have insufficient certainty in terms of development potential and/or not being appropriate to form housing allocations. This is not to say that they may not receive planning permission but that one or more of the following may be valid:

- i) It is uncertain whether potential constraints can be overcome such that the site may not be capable of delivery and hence would not count towards the required level of housing required.
- ii) They were too small to be shown as housing allocations in the NDP.
- iii) It was uncertain whether they were available.

5.6 Table 3 indicates the ranked order of sites, with the site considered most suitable. The requirement is to provide an additional 12 dwellings as a minimum requirement.

**Table 3: Ranking of Sites to achieve the Outstanding Minimum Target of up to 12 dwellings**

Rank Order	Site Reference	Number of dwellings	Running Total
1	24	6	6
2	31b	6	12

5.7 The settlement boundary for Whitchurch should be based upon that drafted for Herefordshire Unitary Development Plan but with sites granted planning permission on the east side of the A40 where these extend that boundary and also adding site 31b (as amended to a reduced area). In addition, the boundary should be extended to include land on the north-east side of the A40 where planning permission has been granted and the proposed housing site 24 is shown as a housing allocation. The suggested area is shown on Map 2.

5.8 Symonds Yat West has not previously had a settlement boundary defined for it. Although the settlement comprises of a loose assemblage of dwellings, a settlement boundary is proposed (Map 3) around the main concentration of dwellings and a policy drafted that would allow for limited infilling where, in particular, it does not adversely affect its special character. It is also acknowledged that development may be restricted by the nature of the local road network. The combination is presented on the basis that Herefordshire Council feels it can successfully comply with both the wording and intention of the policy for the defined settlement area. This will be revealed through the formal consultation process.

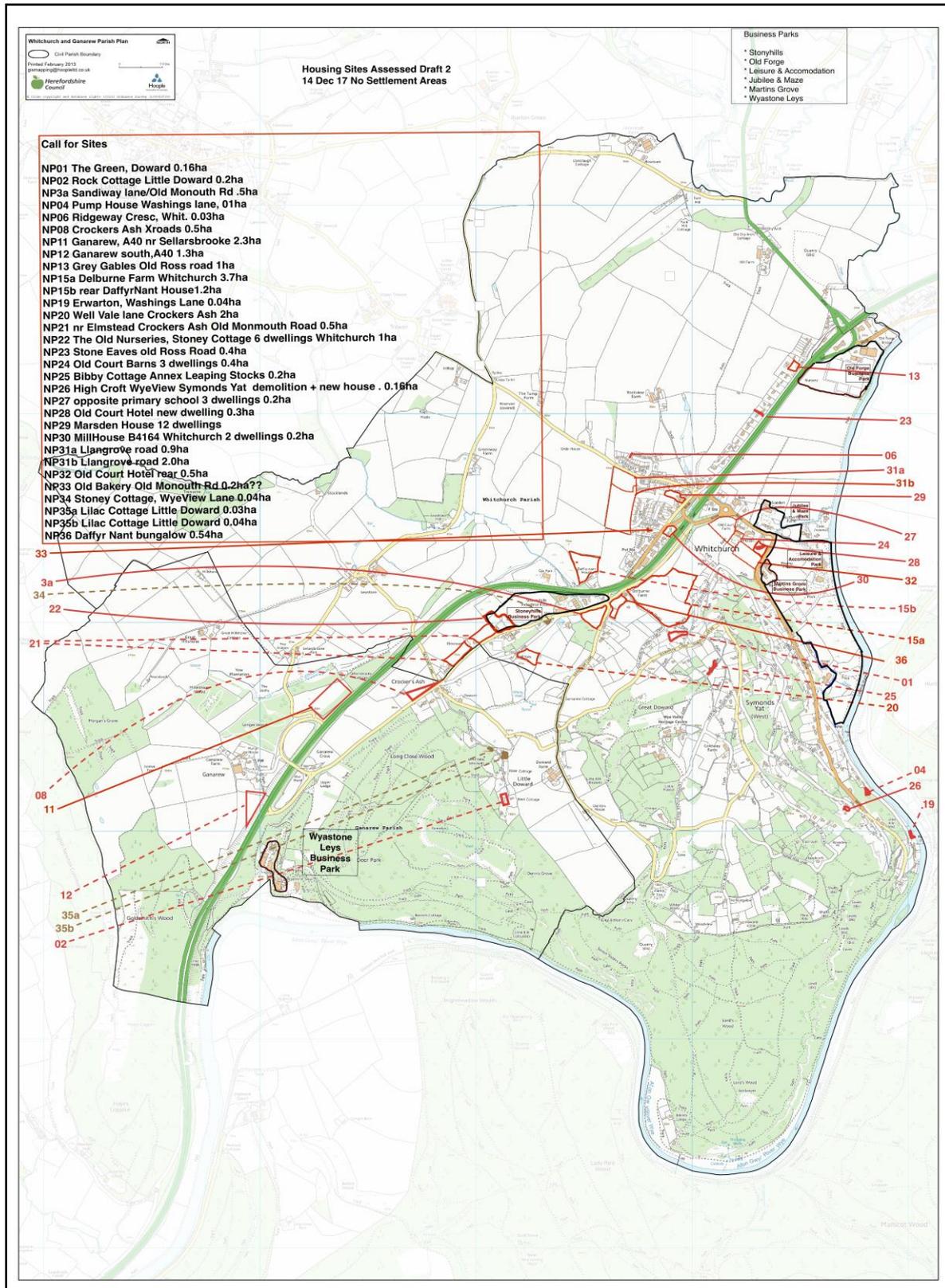


**Table 4: Houses built from 2011 and sites with planning permission outside Call for Sites arrangements incorporated in the allocation**

Site Description	Notes	No of Dwellings	Running Total
Mill House, Old Monmouth Road	One house built (Query Application number)	1	1
Land adjacent to the Fire station	Four houses built – Application Number S1221222/F	4	5
Land adjacent to the Fire Station	Two houses built – P142183/F	2	7
Apsley House, Old Monmouth Road	One house built – P132509/F	1	8
Maple House, Old Monmouth Road	One house built – S120603/F Originally land next to Windrush.	1	9
Kirby's Yard site, Old Monmouth Road.	Application No. P173665/XA2 Planning permission granted for 9 houses – (Query Application number)	9	18



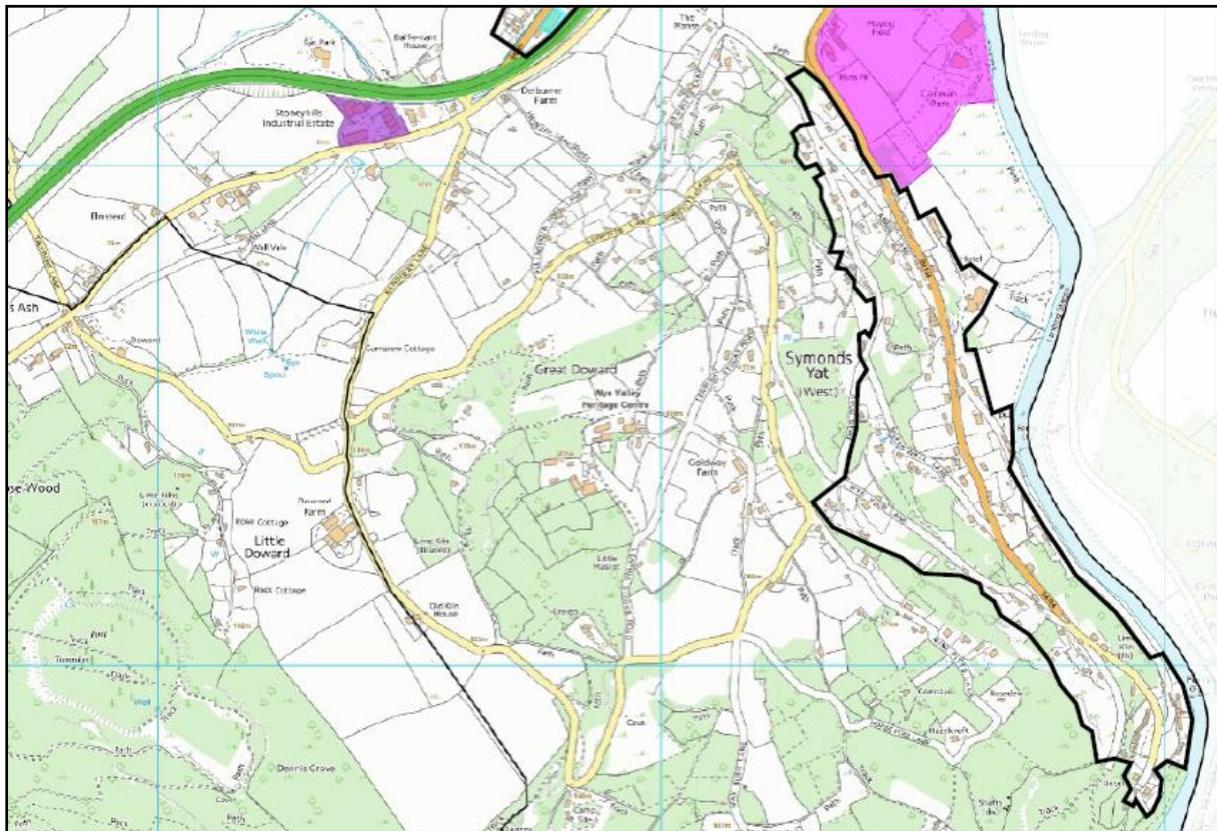
# Map 1: Sites Submitted through the 'Call for sites'







### Map 3: Proposed Symonds Yat West Settlement Boundary





## **Appendix 1: Herefordshire Local Plan Core Strategy Policy RA2**

**Policy RA2 – Housing in settlements outside Hereford and the market towns.**

**To maintain and strengthen locally sustainable communities across the rural parts of Herefordshire, sustainable housing growth will be supported in or adjacent to those settlements identified in Figures 4.14 and 4.15. This will enable development that has the ability to bolster existing service provision, improve facilities and infrastructure and meet the needs of the communities concerned.**

**The minimum growth target in each rural Housing Market Area will be used to inform the level of housing development to be delivered in the various settlements set out in Figures 4.14 and 4.15. Neighbourhood Development Plans will allocate land for new housing or otherwise demonstrate delivery to provide levels of housing to meet the various targets, by indicating levels of suitable and available capacity.**

**Housing proposals will be permitted where the following criteria are met:**

- 1. Their design and layout should reflect the size, role and function of each settlement and be located within or adjacent to the main built up area. In relation to smaller settlements identified in fig 4.15 proposals will be expected to demonstrate particular attention to the form, layout, character and setting of the site and its location in that settlement and/or they result in development that contributes to, or is essential to the social well-being of the settlement concerned;**
- 2. Their locations make best and full use of suitable brownfield sites wherever possible;**
- 3. They result in the development of high quality, sustainable schemes which are appropriate to their context and make a positive contribution to the surrounding environment and its landscape setting; and**
- 4. They result in the delivery of schemes that generate the size, type, tenure and range of housing that is required in particular settlements, reflecting local demand.**

**Specific proposals for the delivery of local need housing will be particularly supported where they meet an identified need and their long-term retention as local needs housing is secured as such.**