

Clehonger Neighbourhood Development Plan 2011-2031

Consultation Statement

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1. INTRODUCTION

1.1 This Consultation Statement has been prepared to accompany the submission of the Clehonger Neighbourhood Development Plan (NDP) to Herefordshire Council (HC), the local planning authority, and to ensure that the relevant statutory requirements are met.¹ The Statement:

- Contains details of the persons and bodies who were consulted about the proposed Plan;
- Explains how they were consulted;
- Summarises the main issues and concerns raised by those consulted; and
- Describes how these issues and concerns have been considered and, where relevant, addressed in the proposed Plan.

Format of the Consultation Statement

1.2 The Statement covers the following stages of Plan preparation, arranged in chronological order:

- The initial stages of work on the Plan, covering the establishment of the Neighbourhood Area and the steering group (section 2).
- Initial community engagement to explore and identify issues (section 3).
- The residents' questionnaire survey (section 4).
- The draft Plan consultation under Regulation 14 (section 5).
- The issues and concerns raised in response to the Regulation 14 consultation, and how they were addressed (section 6).

1.3 Each section of the Statement gives an overview of the activity undertaken at that stage. Documents referred to are where possible referenced by web address or otherwise included in Appendices.

1.4 The following consultation approaches were used:

- Posting of material online via an NDP tab on the Clehonger Parish Council website at <https://clehongerparishcouncil.org/clehonger-neighbourhood-plan/>.
- Creation of a Facebook page in the name of Clehonger Neighbourhood Development Plan (10 updates posted).
- Regular steering group meetings open to the public at the Innesfield Community Centre, centrally located in Clehonger village.
- Including regular items in "Tracking the News", a locally-produced monthly community newsletter which includes the parish, and in the Hereford Times (Community Times section).
- Posting of material on the parish noticeboards.
- Daytime and evening drop-in events held at key stages in the process. These events were publicised by flyers and by use of Tracking the News and the Hereford Times.
- Residents' questionnaire survey.
- For the Regulation 14 consultation on the draft NDP, distribution of flyers to households and businesses in the Neighbourhood Area together with consultation by email or post to consultation bodies and other consultees. Printed copies of the draft NDP were available to view locally and in Hereford, and were supplied free of charge on request from the Village Stores and the Parish Clerk.

¹ Neighbourhood Planning (General) Regulations 2012, Regulation 15 (2)

2. ESTABLISHING THE NEIGHBOURHOOD AREA AND STEERING GROUP

2.1 The following steps and actions were undertaken in terms of initiating work on the NDP:

- Initial consideration by Clehonger Parish Council as to whether to undertake the NDP. A presentation by a Herefordshire Council planning officer was made to the Annual Parish Meeting in 2013, and parish representatives attended an information evening held by Herefordshire Council in March 2014.
- The decision to undertake the NDP was made at the Parish Council meeting on 20 March 2014. Minutes of this and other Parish Council meetings referred to are available at <https://clehongerparishcouncil.org/parish-council-minutes/>.
- Discussions were held in June 2014 with neighbouring Allensmore Parish Council. This led to land and properties in Allensmore parish being agreed for inclusion in the Clehonger Neighbourhood Area. The land and dwellings concerned lie on the southern edge of Clehonger village and the view was that their incorporation within the Clehonger Neighbourhood Area would facilitate the proper planning of the village.
- The application to designate a Neighbourhood Area on this basis was made to Herefordshire Council on 25 September 2014. Consultation by Herefordshire Council on the proposed Clehonger Neighbourhood Area ran from 9 October 2014 to 20 November 2014. No comments were received, and the application for the designation of the Neighbourhood Area was approved on 21 November 2014.
- Following a further talk by a Herefordshire Council planning officer to the Parish Council in March 2015, a Steering Group was established at the Parish Council meeting on 22 October 2015. This included full parish councillor representation. The first meeting of the Steering Group to launch work on the NDP took place on 12 November 2015.

2.2 The issues and concerns raised in this initial stage of the plan-making process comprised in summary:

- Whether to proceed in principle with an NDP, given the fact that work was only just being completed on a Parish Plan.
- The extent to which the communities could control the type of development they wanted to see in the Neighbourhood Area.
- Queries in respect of the process to be followed and the need for professional support.

2.3 These issues and concerns centre on delivering greater local control over development by making effective and informed use of the powers available under the Localism Act 2011. They were considered and addressed by:

- The Parish Council decision in March 2014 to undertake an NDP.
- Successful application for Neighbourhood Area designation.
- The Parish Council's decision in October 2015 to establish a Steering Group including parish councillors and other community representatives.
- Seeking expert guidance, leading to the early appointment of a planning consultant in December 2015.

3. EXPLORING THE ISSUES

- 3.1 Following a discussion about community consultation at the Steering Group, two drop-in events were arranged. These provided an opportunity to explain to the wider community how it was intended to prepare the NDP, and to identify and explore local issues.
- 3.2 The first drop-in event was on Saturday 20 February 2016 from 10.00 am to 1.00 pm at the Innesfield Community Centre. It was promoted as an NDP Launch Day and publicised using Tracking the News, the Hereford Times, and by distributing a flyer to households.
- 3.3 The event was staffed by members of the Steering Group. An information sheet was prepared covering the topics which it was proposed to address in the NDP – transport and communication, business, housing, leisure and services and environment. Steering Group members were allocated to these topics with a table for each. There were 22 attendees. Comments made were recorded for consideration. Following the Launch Day and in the light of the feedback, the Parish Council took the decision to continue with the development of the NDP (Parish Council meeting 17 March 2016).
- 3.4 The second drop-in event was on Tuesday 5 December 2016 from 7 pm to 9 pm at the Innesfield Community Centre. It was promoted in Tracking the News. As before it was staffed by members of the Steering Group. There were two attendees.
- 3.5 The events provided a forum to explain the thinking behind undertaking the NDP, to raise awareness and to collect initial comments on issues of concern. These were considered and addressed by ensuring that the matters raised informed the overall scope of the residents' questionnaire survey, with questions seeking further information on specific points, such as the form and types of new housing and its location, community facilities and protecting the environment.

4. RESIDENTS' SURVEY

- 4.1 The next stage of the plan-making process was the residents' survey. A questionnaire was prepared taking into account the issues arising and information gathered up to that point, including through the recently-completed Parish Plan process and the NDP drop-in events, together with discussion in the Steering Group.
- 4.2 Key themes were identified for the survey around housing; recreation, leisure and services; the environment; business; and transport/road safety. The questionnaire asked 15 questions in total on these topics. Each question sought opinion on a range of objectives against multiple choices, and also allowed for free-write comments and suggestions.
- 4.3 The questionnaire explained the purpose and function of the NDP, as well as the importance of gathering local views on development and growth. A map of the Neighbourhood Area was included, as well as completion and return instructions.
- 4.4 Questionnaires were hand-delivered to households within the Neighbourhood Area in February/March 2017. All residents aged 16 and over were invited to participate in the survey. Completed questionnaires were collected by hand. Overall, 491 questionnaires were completed. This is 41.2% of the residents of Clehonger parish aged 16 and over at the time of the 2011 Census (1,191).²
- 4.5 Analysis of the questionnaires was undertaken with professional support, with the results being presented as:
- Results Report: a full report analysing the questionnaire responses. A summary of the principal findings of the survey can be seen at Appendix 1.
 - Comment listings: report listing all the comments made in response to questions inviting free-write comment on all aspects of development and the environment.
- 4.6 The summary of results was disseminated by uploading to the Parish Council website and via Tracking the News (extract at Appendix 2).
- 4.7 The survey provided a wealth of information for consideration in the preparation of the NDP. The issues and concerns raised (see Appendix 1) were considered at subsequent stages of the process. Land use and development issues were addressed through the formulation of planning policies in the draft NDP. Non-land use issues such as road maintenance were addressed as Community Actions in the draft NDP.

² This is not allowing for the small amount of housing (c. 40 dwellings) south of Poplar Road at Clehonger village. As explained in para. 2.1 above this is within the Neighbourhood Area so as to allow for the proper planning of Clehonger village, but otherwise falls within Allensmore parish, including for Census reporting purposes.

5. CONSULTATION ON THE DRAFT PLAN

The consultation process

- 5.1 Consultation on the draft NDP was carried out in accordance with the requirements of Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. The consultation ran for six weeks from 17 June 2019 to 29 July 2019.
- 5.2 The Environmental Report and Habitats Regulations Assessment, which had been carried out by HC in June 2019, were also published for consultation.
- 5.3 The draft NDP included a pre-submission consultation and publicity notice, setting out the requisite details of the consultation. The draft NDP, the consultation and publicity notice, a comments form, the Environmental Report and the Habitats Regulations Assessment were all posted on the Parish Council website.
- 5.4 At the start of the consultation period a flyer was distributed to households and businesses throughout the Neighbourhood Area by members of the Steering Group and other volunteers. This explained how and where the draft NDP could be viewed and invited comments. A poster was also prepared to advertise the consultation and placed on parish noticeboards. Printed copies of the draft NDP were deposited for inspection at the Clehonger Village Stores and at the Hereford Customer Service Centre. Copies were also available at the Village Stores for residents to take away free of charge if so desired. The consultation was publicised in Tracking the News and in the Hereford Times (for extracts see Appendix 2).
- 5.5 Comments could be made by hand, post or email, or at a drop-in session held at the Innesfield Community Centre on Saturday 6 July.
- 5.6 A list of consultees was compiled by the Steering Group, starting with the statutory consultees identified in guidance produced by HC.³ Other consultees were then added to the list, having regard to the consultation bodies specified in paragraph 1 of Schedule 1 of the 2012 Regulations. The final list is at Table 1. Consultation was by email or letter, sent by the Parish Clerk at the start of the consultation period and explaining where the Plan could be viewed and how and by when to make comments.
- 5.7 The drop-in event on 6 July was designed to give an opportunity for local residents and businesses to seek further details on any aspect of the NDP, and to make comments. The event was publicised in the NDP Regulation 14 publicity material. For the day, a set of display boards were prepared (Appendix 3) and copies of the draft NDP and comment forms were available. The sessions were staffed by members of the Steering Group and the planning consultant. Refreshments were provided. The event was attended by 13 residents and the HC ward councillor.

³ https://www.herefordshire.gov.uk/downloads/file/3704/guidance_note_13_statutory_consultees

Table 1: draft NDP consultees

National organisations	
Environment Agency	Highways England
Natural England	Herefordshire Primary Care Trust
Historic England	National Grid
Coal Authority	RWE Npower Renewables Ltd.
Homes and Communities Agency	Western Power Distribution
English Heritage	Dwr Cymru Welsh Water
National Trust	Arriva Trains Wales (now Transport for Wales)
Forestry Commission England	Network Rail
Local organisations	
Herefordshire Council (HC)	Woodland Trust
Cllr D. Hitchiner, HC	Herefordshire Wildlife Trust
CPRE Herefordshire	National Farmers Union Herefordshire
H & W Chamber of Commerce	Parochial Church Council
Adjoining parish councils	
Breinton PC	Allensmore PC
Belmont Rural PC	Kingstone and Thruyton PC
Callow and Haywood PC	Eaton Bishop PC

6. RESPONSES TO THE CONSULTATION

Issues and concerns raised

- 6.1 Consultation body responses were received from Herefordshire Council and seven other organisations. Comments were received from nine parishioners and two agents on behalf of landowners. All the comments are shown in the Response Log at Appendix 4, together with a response to each comment and amendments to the draft NDP where these arise.
- 6.2 The principal issues and concerns which were raised in the consultation may be summarised as follows:
- The draft NDP policies were all considered by HC to be in general conformity with equivalent strategic policies.
 - That two draft NDP policies were superfluous, the issues having already been addressed in the Local Plan Core Strategy.
 - Suggestions for additional land and buildings to be included in the Clehonger settlement boundary.
 - Comments in respect of land at the former Belmont golf course which falls partly within the Clehonger Neighbourhood Area.

Considering and addressing issues and concerns

- 6.3 All comments were passed to the planning consultant for review and to provide a recommended response, including amendments to the draft NDP. Key issues and concerns were discussed at a Steering Group meeting on 19 August 2019. The recommended detailed responses and NDP amendments were then considered at a meeting of the Parish Council. Table 2 provides a summary of the principal amendments to the draft NDP in plan order. Full details may be found in the Response Log at Appendix 4.

Table 2: Schedule summarising principal changes made to the draft NDP following consultation

Ref	Consultee	Change to be made
	Herefordshire Council	Update housing delivery information to the April 2019 position.
	Golf Inns Limited (agent Savills)	Amendment to para. 4.5 to clarify the intent of the approach to housing delivery and to provide a link to Local Plan Core Strategy themes of proportionate development and community cohesion.
	Public comment	Policy C2: amend settlement boundary to include: Shark House and Shark House Barn Land and property at Walnut Tree Farm.

APPENDIX 1

Residents' survey: Summary of results

The survey was undertaken in February/March 2017 and achieved a response rate of 41.2%.

Housing

- Favoured categories of housing were affordable home ownership, affordable rented and private housing. Traveller sites were not supported, with permanent provision being opposed by 78%. Comments emphasised that whilst more housing was not needed to satisfy planning requirements, if some were to be built it should be to help meet a need for smaller and less-expensive homes for younger people and families.
- Semi-detached homes and bungalows were favoured over detached or terraced housing, flats and apartments; and homes with 2 or 3 bedrooms were favoured over larger properties. These preferences were supported in comments, which also pointed to the need for a mix of new housing to best meet community requirements.
- Designs that were energy-efficient and which were in character with their surroundings were supported, with mixed views on modern designs. Three-storey houses were not favoured.
- Most respondents wanted to see new housing connected to mains drainage, have off-road parking or garage for at least one car, and be provided with a garden.
- In terms of the amount of new housing, only limited further provision was supported taking into account existing planning permissions. Many comments again pointed out that more housing was not needed; others that new housing should be affordable and help meet local needs.
- Most thought that new homes should be built in small developments of between 2 and 5 dwellings. There was little support for schemes in excess of 80 dwellings. Comments endorsed the preference for small and medium clusters of new development over larger schemes. There were also concerns that infrastructure in the widest sense should be available in step with new buildings – sewerage and drainage, community services, local employment, and transport.

Recreation, leisure and services

- There was significant support for the objectives of improving the village hall and playing field, followed by maintenance of the Church; allotments were least-favoured.
- The most important services to respondents were broadband connection, a local doctor's surgery, mobile phone reception and village crime prevention schemes; least important were drop-in sessions for advice and a voluntary library.
- Comments on this topic covered a wide range of issues. Ways of improving the giving of information to the community attracted most attention, followed by broadband availability and speed.

Environment

- Built environment key objectives were energy efficiency, traffic speed reduction and retaining the identity of village and hamlets; securing quiet lane status was seen as least important. Traffic speeds and means of reducing it were the main focus of comments.
- Natural environment key objectives were managing surface water run-off from development to avoid flooding and to protect water quality. Most other environmental objectives were also seen as important. Comments addressed a wide range of environmental concerns with no one issue to the fore.
- Community environment key objectives were sense of security, rural landscape, the school, infrastructure, green spaces and air quality. Most other objectives were also seen as important. Comments focussed on various aspects of rural life and living in Clehonger, with the possible impact of new development a recurring concern.

Business

- Business objectives, particularly increased employment opportunities, were well-supported.
- Tourism was not seen as a significant growth opportunity.
- Traditional farming was seen as very important, with relatively little support for intensive farming or industrial farm diversification. However, comments encompassed varying points of view, particularly on intensive farming.

Transport/road safety

- Key transport objectives were road maintenance and road safety in new developments. Road maintenance was important or very important to 95%.
- Community transport, public transport, speed reduction measures and school parking solutions were also well-supported. Cycleways and pedestrian routes were seen as being of the relative lowest priority although these were still important/very important to three-quarters.
- Comments emphasised difficulties around drop-off and pick-up times at the school, together with the need for traffic speed reduction and other issues around cycleways, road maintenance and public and community transport.

Demography

- Compared to 2011 Census data for the Neighbourhood Area, age groups up to and including 40-49 were under-represented against the 2011 Census. The 70+ age group, a quarter of the usual resident population at the time of the Census, accounted for 37% of responses.
- Females were slightly over-represented in responses.

APPENDIX 2

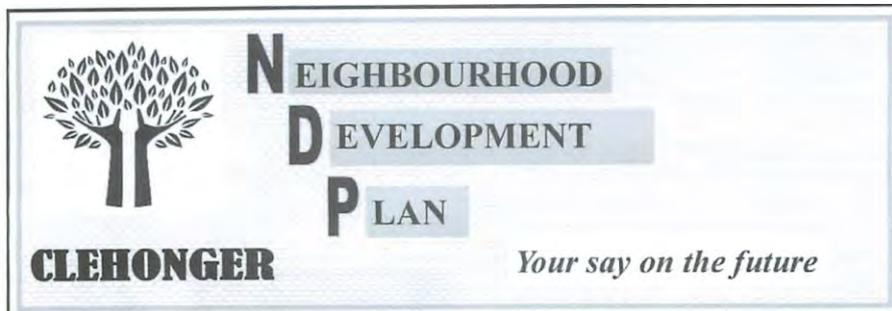
Publicity in local media

Hereford Times 27.6.2019 and 4.7.2019



Tracking the News

January 2019



The Neighbourhood Development Plan has been re-launched and a Steering Group set up. We have engaged the services of an expert consultant who will guide us through the process and he has started by analysing all those questionnaires you completed last year. Further updates will follow here as well as on the Parish Council website, Facebook and on the village notice boards. It's your village so please get involved.

Tracking the News, continued

February 2019 (full page)



Summary of Clehonger NDP survey results

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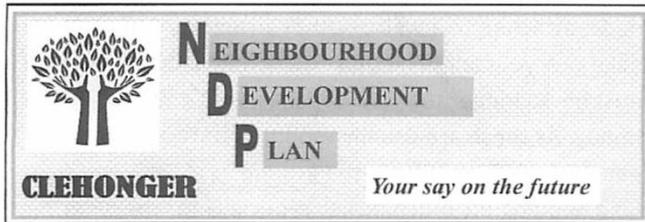
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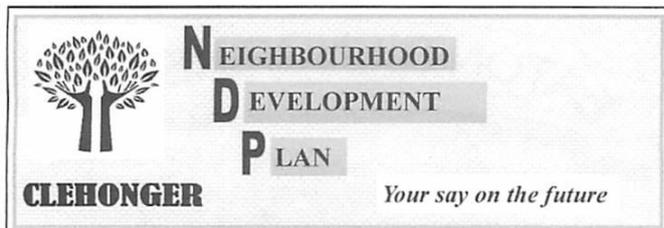
Tracking the News, continued

April 2019



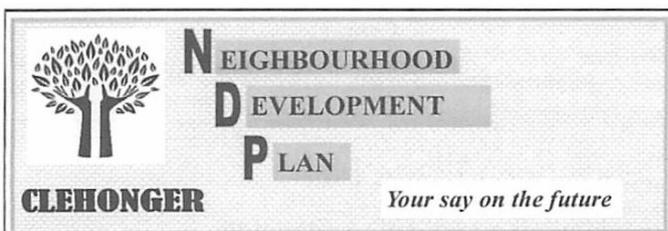
Progress continues and the draft Plan is to be submitted to the Parish Council at their April committee meeting. Points of contact for specific questions are Alison Davies (01981 251269) and Carole Protherough (01981 251012). Otherwise join us at the next Steering group meeting: 7pm on Monday 8th April at Innesfield Community Centre.

May 2019



The draft plan goes before the Parish Council at their committee meeting on 18th April, just after this goes to press. Subject to their approval, the next stage is the public consultation. Watch this space for further details. The next steering group meeting is Monday 13th May, 7.00pm at Innesfield Community Centre, all welcome.

June 2019



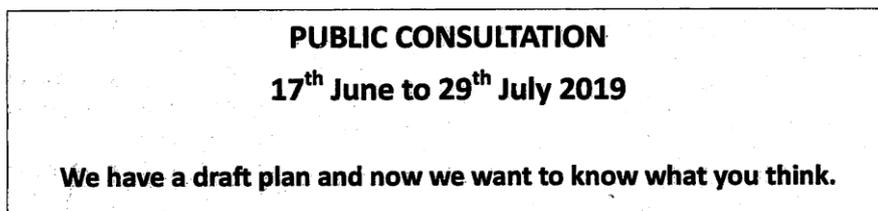
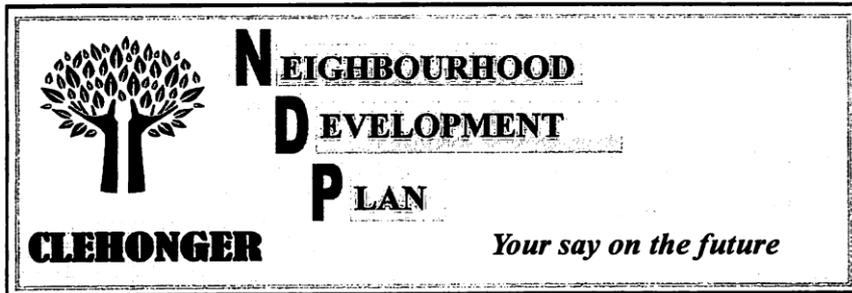
The 6 week public consultation period is from 17th June to 29th July. You will be able to inspect the draft Plan on the Parish Council website, on request from the Parish Council Clerk and in person at various sites to be confirmed.

A drop-in session is being planned at the Innesfield Hall on 6th July between 10am and 2pm.

Details of how to comment will be advised.

Tracking the News, continued

July 2019 (full page)



First of all, have a look at the draft plan:

- Find it on-line at <https://clehongerparishcouncil.org>
- View a printed copy for inspection purposes at Clehonger Village Stores or Hereford Customer Services, Blueschool House, Blueschool Street, Hereford.
- Ask the Parish Clerk, Alison Wright, to send you a copy – email samoyedskye@aol.com or telephone 01981 250860.

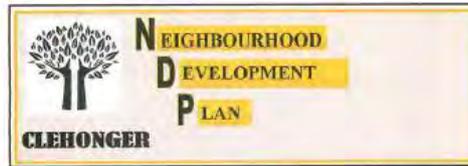
Then please give us your feedback in writing, including your name and address. Comment forms are available at all of the above and when complete, return as follows:

- By hand to the collection point at Clehonger Village Stores.
- By post to the Clerk to Clehonger Parish Council, Longfield House, Gooses Foot, Kingstone, Hereford HR2 9NE.
- By email to the Clerk at samoyedskye@aol.com

Plus

All parishioners are invited to a DROP-IN SESSION where you can view and make comments on the draft plan. Please join us at the **Innesfield Hall** on **Saturday 6th July** between **10am and 2pm**. (Refreshments will be available).

Closing time and date for comments: 5pm Monday 29th July 2019



Clehonger Neighbourhood Development Plan 2011-2031

The story so far

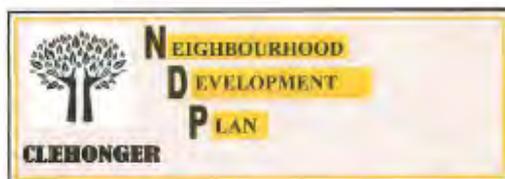
- **Parish Council decides to prepare NDP**
- **Neighbourhood Area approved in 2014**



- **Steering Group formed**
- **Residents' questionnaire Spring 2017**
- **Preparation of draft NDP**

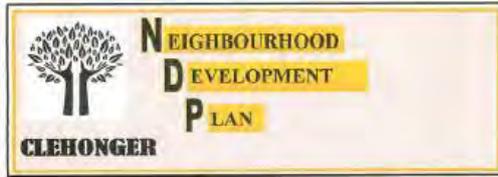
Public consultation on the draft Plan

17 June to 29 July 2019



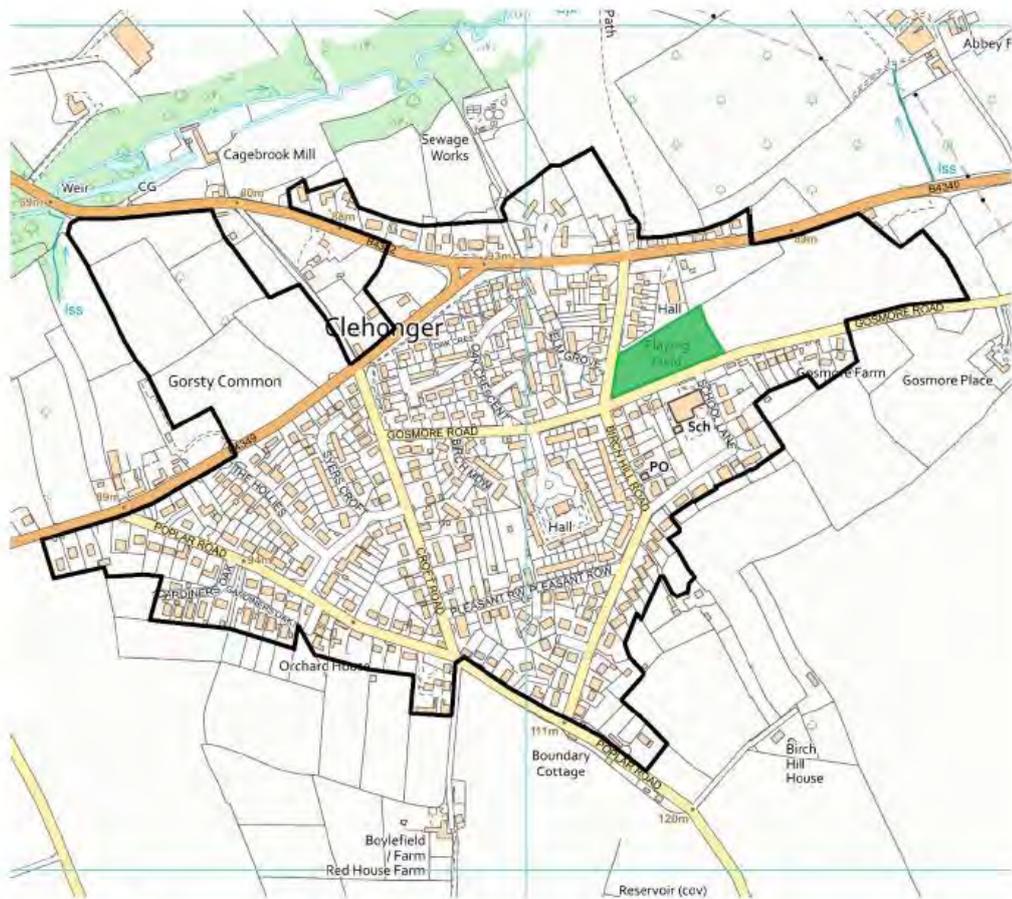
Housing

- Herefordshire Council requires at least 109 new houses to be provided in the Neighbourhood Area 2011-2031
- As at April 2018, this has been met by:
 - new building since 2011 (17 houses)
 - planning permissions (189 houses)
 - future windfall allowance (16 houses)
- No further land for new houses is identified in the NDP
- NDP includes policies on:
 - Clehonger settlement boundary
 - Type & size of housing needed locally



Clehonger Neighbourhood Development Plan 2011-2031

Proposals for Clehonger



-  Settlement boundary (policy C2)
-  Clehonger playing field (policy C10)

 NORTH © Crown copyright and database rights (2016) Ordnance Survey (0100053146). Not to scale.

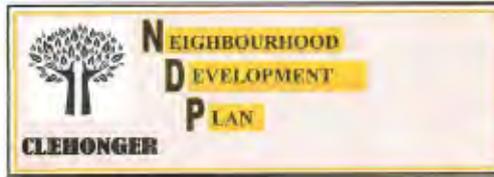
3



Clehonger Neighbourhood Development Plan 2011-2031

Environment

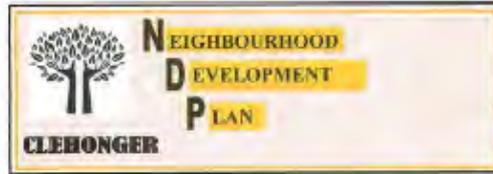
- **Natural environment**
 - Nationally-designated sites
 - Local Wildlife Sites
 - Landscape character & views
- **Historic environment**
 - Heritage assets – listed buildings, scheduled monuments, parks and gardens
 - Historic farmsteads
- **Design**
 - Character
 - Sustainability
 - Amenity & access
 - Landscaping and green infrastructure



Cleghonger Neighbourhood Development Plan 2011-2031

Economic and Social

- **Business and tourism**
 - Supported subject to scale & traffic
 - Re-use of redundant buildings
 - Extensions and home working
 - Farm diversification
 - Tourism and leisure
- **Agricultural development**
 - Larger-scale including polytunnels
- **Community facilities and playing field**
 - Existing facilities protected
 - New provision supported
- **Hereford bypass**
 - Minimise local impacts on landscape, amenity and heritage



Clehonger Neighbourhood Development Plan 2011-2031

Next steps

- **Consultation ends 5 p.m. 29 July 2019**
- **Steering Group** considers comments and any changes needed to the draft NDP
- **Clehonger Parish Council** approves revised NDP
- **Submission of NDP** to Herefordshire Council
 - Plan gains weight in determination of planning applications
- Further **consultation** – six weeks
- Independent **Examination**
- **Referendum**
- **Adoption**

APPENDIX 4

Regulation 14 consultation Response Log showing comments received, response to comments, and amendments to the draft NDP.

Table A4.1 Comments from consultation bodies

Table A4.2 Community and other comments

A4.1 Comments from consultation bodies

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Clehonger draft NDP			
Herefordshire Council (HC) (Neighbourhood Planning)	Chapter 4 Housing delivery and Appendix B.	C	Ensure housing numbers are updated to latest figures for the submission document. These will be sent within the next month. [NB No comment received from Development Management, Transportation and Highways, Environmental Health (Environmental Protection – noise/air), Environmental Health (Environmental Protection – contaminated land), Strategic Housing, Landscape, Conservation, Archaeology, Economic Development, Education, Property Service, Parks and Countryside, Waste].	Noted and agreed. Updated housing delivery figures to the April 2019 position are now available.	Amend Housing delivery section as follows: Dwellings completed 2011-April 2019: 59 Dwellings with planning permission at 1 April 2019: 152 Windfall allowance: 15 Total housing delivery: 226. A revised and updated NDP Appendix B is at Appendix 1 to the Response Log.			
Herefordshire Council (HC) (Strategic Planning)			Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment		Response to comment on policy C5, Historic environment: Protection of heritage assets is an important local issue. In the questionnaire survey, 83% of respondents thought that the protection of historic and listed buildings and landmarks was important or very important. Policy C6 includes elements which are not present in the Core Strategy, distinguishing between designated and non-designated heritage assets and giving great weight to the conservation of designated heritage assets irrespective of the scale of harm or loss or significance. Policy C5 also develops themes set out in the	No change.		
			Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)			In general conformity (Y/N)	Comments
			C1	H3, LD1, SS4, SS1, SC1, OS2			Y	
			C2	H1, H3			Y	
			C3	H3			Y	
			C4	LD1, LD2, LD3, SS6, SD3, SD4			Y	
C5	LD4	Y	This is not a conformity issue but Inclusion of this policy seems superfluous, when the issues are already addressed in the same manner in the CS					

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						policy.	<p>vision, objectives and policy C1. Its continued inclusion will ensure that the NDP is a locally relevant and coherent document.</p> <p>Response to comment on policy C6, Design:</p> <p>Ensuring high quality design is an important local issue. The explanatory text to the policy refers to residents' concerns, revealed by the questionnaire survey, and these issues have informed the policy. As the text explains, Clehonger has a variety of building styles using a range of materials, and in this local context an unduly prescriptive approach would not be appropriate. Policy C6 also develops themes set out in the vision, objectives and policy C1. Its continued inclusion will ensure that the NDP is a locally relevant and coherent document.</p>	
			C6	SD1, MT1, SS4, LD3, LD1, LD2	Y	The policy is generic and tends to add little to the CS equivalent. It broadly echoes the same criteria without any attempt at tailoring, to fit the localised context or address local issues. Other than the mention charging points for electric vehicles, uses locally appropriate and native species. Most of the concerns raised have been covered by the CS. This is not a conformity issue but Inclusion of this policy seems superfluous, when the issues are already addressed in the same manner in the CS policy.		
			C7	SS1, RA5, RA6, E3, E4	Y			
			C8	SS1, RA6, MT1, SD1	Y			
			C9	SC1	Y			
			C10	OS2	Y			
			C11	SS1, SS4, SC1, MT1, LD3	Y			
Breinton Parish Council	NDP	S	Breinton Parish Council is a strong supporter of Neighbourhood Development Plans in principle and particularly in favour of our neighbouring parishes creating their own plans. We look especially for strong environmental policies and more generally aspire to the maximum consistency between the policies				This support for the NDP is welcomed.	No change.

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			of the various plans. This is particularly so where the policies may impact on our shared boundaries, in this case the River Wye Valley SAC/SSSI from a point east of Belmont Abbey to Tuck Mill immediately east of Eaton Camp SAM. In our opinion Objective 2 in the draft Plan – ‘To protect and enhance the local environment’ is particularly important. We strongly support the Policies we have highlighted below from the draft Plan in their entirety and/or the elements within them that we have particularly identified.		
	Policy C1	S	We strongly support the Policies we have highlighted below from the draft Plan in their entirety and/or the elements within them that we have particularly identified: criterion 2.	Support welcomed.	No change.
	Policy C4	S	We strongly support the Policies we have highlighted below from the draft Plan in their entirety and/or the elements within them that we have particularly identified: whole policy, subject to objection re criterion 3.	Support welcomed.	No change.
	Policy C4 criterion 3	O	We were surprised that the opportunity to designate important views of/along the River Wye has not been taken in view of its important role in the picturesque movement and the need to preserve the integrity of these views from both sides of the river and along its length. Inappropriate development on either bank could have significant detrimental impacts.	There is a lack of public rights of way in the north of the Neighbourhood Area from which views of the River Wye could be afforded. Given the absence of public view opportunities, such protection would not be appropriate.	No change.
	Policy C5	S	We strongly support the Policies we have highlighted below from the draft Plan in their entirety and/or the elements within them that we have particularly identified: whole policy.	Support welcomed.	No change.
	Policy C8		We strongly support the Policies we have highlighted below from the draft Plan in their entirety and/or the elements within them that we have particularly identified: whole policy.	Support welcomed.	No change.
	Policy C11	S	We strongly support the Policies we have highlighted below from the draft Plan in their entirety and/or the elements within them that we have particularly identified: criteria 1-4 and 6-8.	Support welcomed.	No change.

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	NDP	C	Anything that can be done to further strengthen these policies would, in our opinion, be a good thing. We are aware that the Hereford Area Plan has site Bel08 on its list of potential housing development sites for the city and while this is actually within Belmont Rural Parish it is adjacent to Clehonger's eastern boundary. Should it ever be developed this site could significantly reduce the environmentally beneficial impacts and intentions of your Policies C1, C4 and C5.		
Coal Authority	NDP	C	Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on it.	Noted.	No change.
Dwr Cymru Welsh Water	NDP	S	I refer to the above consultation. We appreciate the opportunity to comment and offer the following representation: Given that the Neighbourhood Development Plan (NDP) has been prepared in accordance with the Herefordshire Local Plan Core Strategy we are supportive of the aims, objectives and policies set out. We particularly welcome the inclusion of the provisions of Policy C4: Natural Environment; we note that development proposals must adhere to Policy SD3 of the Core Strategy and that criterion 1 outlines that development should not harm the River Wye Special Area of Conservation. As such, there is suitable assurance that development will not be allowed should it impact on the capacity of the public sewerage system. As we understand it, the Neighbourhood Area housing requirement of 109 units has been met through completions and commitments and as such there is only an anticipated windfall requirement of 16 units to the end of the plan period. As such, we will provide specific comments on any future development proposals as and when Herefordshire Council consult us on any planning applications. We hope that the above information will assist you as you continue to progress the Neighbourhood Development Plan.	Noted.	No change.
Environment Agency		C	I refer to your email of the 13 June 2019 in relation to the above Neighbourhood Plan (NP) consultation. We have reviewed the submitted document and would offer the following comments at this time. 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,	Noted.	No change.

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			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 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 that you have utilised the Environment Agency guidance and pro-forma which should assist you moving forward with your Plan. However, it should be noted that the Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with your drainage team as the Lead Local Flood Authority (LLFA).		
Historic England	NDP	C/S	Thank you for the invitation to comment on the Clehonger Neighbourhood Plan. Historic England has no adverse comments to make upon the draft plan which we feel takes a suitably proportionate approach to the main historic environment issues pertaining to Clehonger. We commend the commitment in the Plans Vision, objectives and policies to support well designed locally distinctive development that is sympathetic to the character of the area including its rural landscape character, heritage assets and green spaces. The commitment to conserve historic farmsteads in line with the Herefordshire Farmsteads Characterisation Project is particularly welcomed. Beyond those observations we have no further substantive comments to make. I hope you find this advice helpful.	Noted.	No change.
National Grid	NDP	C	An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.	Noted.	No change.
Natural England	NDP	C	Natural England does not have any specific comments on this draft neighbourhood plan.	Noted.	No change.

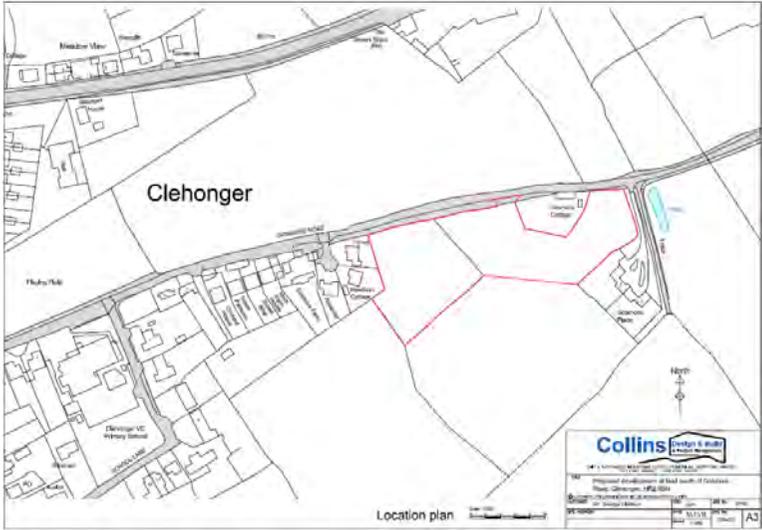
A4.2 Community and other comments

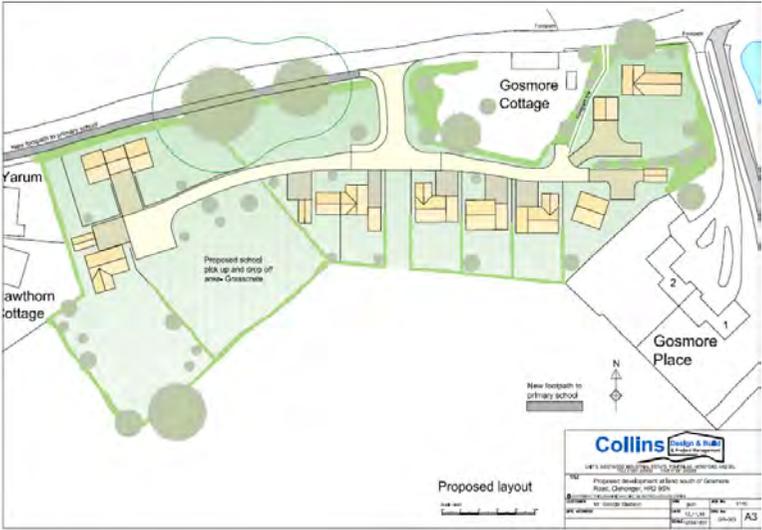
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Parishioner 1	Policy C2, Plan 4.	O	<p>The properties known as Shark House and Shark House Barn should be inside the settlement boundary as annexed in the attached copy of Plan 4. These older properties have historically been part of the village and significantly contribute to the built form particularly as they establish the entrance from the west. It is fitting for the village to have older properties in its mix. They are not in the open countryside.</p>  <p>Plan 4: Clehonger village policies</p> <p>NORTH © Crown copyright and database rights (2016) Ordnance Survey (0100053146). Not to scale.</p>	<p>The properties and land referred to are existing residential curtilages which should be seen as part of the main built up area of the village. A clear physical boundary exists to the west being the route of a public footpath (ref. CH19). The settlement boundary should be amended to appropriately reflect the built form of the settlement.</p>	<p>Amend Clehonger settlement boundary (Plan 4) to include properties and land at Shark House and Shark House Barn as identified in the comment.</p>
Paras. 5.6	C		Whilst there is a sewerage treatment works in Clehonger it is at capacity.		

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	and 5.15.		Recently built housing (and those with planning permission) have been required to provide their own septic tanks. This has meant more land is required to accommodate the outflows and it increases the price of plots so they cannot be considered "affordable". It is best environmentally to be connected to mains drainage so there is better management of waste nutrient levels. The current situation is unsustainable.		
Parishioner 2	Para. 4.19	S	I agree that any future housing should be a mix as described in 4.19 which includes bungalows. The current development of 80 houses on the Clehonger road does not appear to show any bungalows. I feel this should be considered when the tenure of the new 90 house development on the Madley Road is submitted.	Support welcomed.	No change.
	Policy C3	S	I agree, and think we should definitely include this in our Neighbourhood Plan, particularly the final sentence which states " Proposals that seek to concentrate different types and tenures of homes in separate groups on a site will not be supported " This may be of relevance when as above, the tenure of the Madley Road development is submitted.	Support welcomed.	No change.
	Para. 5.6	S	I agree that water quality is an important issue to be included, as set out in the Local Plan Core Strategy policy SD4. I am concerned about the waste water management of the current house building underway on Clehonger Road, plus of course, the new 90 house development not yet built.	Support welcomed.	No change.
	Para. 6.7	S	I agree that our plan should emphasize the fact that traditional farming methods are more in-keeping with the Clehonger area and any proposal for the introduction of industrial-sized developments should be viewed unfavourably.	Support welcomed.	No change.
	Community action CA1	S	I agree this should definitely be listed as a community action. I am concerned that some of the local roads may be affected by traffic speed once all the proposed building projects have been completed.	Support welcomed.	No change.
	Community action CA4	S	I agree this should definitely be listed as a community action. We currently have a daytime bus service but nothing in the evenings and very little on a Sunday. If the village is to accommodate all these news homes then we will	Support welcomed.	No change.

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			need a significant improvement to the local bus services.		
	Community action CA7	S	I agree this should definitely be considered as a community action. I am concerned that the local surgery in Kingstone will not only have a large number of potential new patients from the development opposite it in Kingstone, but also a significant increase in the population of Clehonger.	Support welcomed.	No change.
Collins Design and Build	Policy C2, Plan 4.	O	Please find below an objection to the above plan on behalf of the landowner. The objection only concerns NDP Policy C2 and the proposed settlement boundary. In particular, we recommend the settlement boundary is expanded to include additional land along the south side of Gosmore Road. We have had positive pre-planning discussions with Herefordshire Council concerning a small development of up to ten dwellings on land south of Gosmore Road ('the site') and attached to this letter is a location plan and indicative layout plan for the land in question. We have also had a meeting with Herefordshire Council highways to explore opportunities to improve the safety and connectivity along Gosmore Road between the site and school. The Council have confirmed that the site adjoins the existing edge of the village and built area thus meeting the gateway test within Core Strategy (CS) Policy RA2. The extent of built up area is also clearly changing over the next 12 months as the Persimmon Homes development immediately to the north gets built out. Clehonger is one of the most sustainable villages in the Hereford Housing Market Area scoring very highly on the council's sustainability matrix that underpins the CS rural housing policies in terms of services, amenities and public transport links. Therefore, notwithstanding that Clehonger has exceeded their minimum CS growth target, it remains a sustainable location for additional housing. Furthermore, the CS target is a minimum and in order to reinforce sustainable development principles set out in the Core Strategy and NPPF, there is a need to focus additional housing into the more sustainable settlements in the County. Our proposed housing mix ties in with need identified in the questionnaire survey and set out in draft NDP policy C3. In particular, the development will predominantly comprise of smaller two and three bed properties including bungalows. Homes will all be south facing to maximise passive solar gain also then enabling the provision of solar PV on the south roofs slopes thus minimising future carbon impact and associated energy bills.	This site comprises a paddock and part of a larger field, 0.82 ha. in total, with hedgerow boundaries including to Gosmore Road. To the west it adjoins residential curtilages which are within the proposed settlement boundary. To the east the site wraps around Gosmore Cottage and abuts Gosmore Place; these properties are outside the proposed settlement boundary. To the north, residential development is underway on the opposite side of Gosmore Road, which will retain its present strong rural character when this development is complete. The site is outside the built-up area of Clehonger, to which there is a clear physical boundary represented by the property curtilages to the west and Gosmore Road to the north. The settlement boundary as drawn appropriately reflects the built form of the settlement.	No change.

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			<p>Of particular note is the opportunity the development provides to fully or partly address several of the NDP Community Actions as follows: CA1 Highways – road safety and traffic speed Clehonger Parish Council will continue to work with Herefordshire Council, West Mercia Police and the Safer Roads Partnership others to identify and implement measures to address the issues raised where possible, to include seeking traffic calming and the enforcement and further introduction of speed limits.</p> <p>CA2 Highways – parking in Clehonger Clehonger Parish Council will continue to address roadside parking issues in the village particularly at the Primary School by seeking ways of reducing car use for short trips and promoting alternative parking solutions.</p> <p>CA5 Walking and cycling Clehonger Parish Council will continue to work with landowners to promote the maintenance of public rights of way throughout the Parish and to seek improvements to connectivity in and around the village to foster walking and cycling as alternatives to use of the private car for short trips.</p> <p>Proposals to address CA 1, 2 and 5</p> <ul style="list-style-type: none"> ➤ Proposed hard surfaced parking area for school pick up / drop off and events ➤ New footpath link between the site and primary school with a further link into the local public right of way network ➤ Extend 30mph speed limit NE along Gosmore Road past the proposed development site <p>This scale of off-site infrastructure provision goes beyond what would normally be required or expected from a development of up to ten dwellings but the applicant is prepared to deliver this as it is recognised that this site is likely to be the only opportunity to deliver some of these Community Actions</p>		

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			<p>affecting the local area. A more detailed technical analysis of the site is appended to this letter but in summary, the expansion of the settlement boundary to accommodate this site as a small allocation or windfall opportunity will enable the delivery of several community benefits as well as a sustainable housing development that integrates with and respects the character and settlement pattern of the village. The development can also satisfy all the key policy requirements of the draft NDP and adopted development plan policies in relation to matters such as safeguarding local amenity, safe access and footpath connections, enhancing ecology, landscape mitigation, sustainable layout and drainage. I would appreciate the NDP committee's consideration of this representation and incorporate a modest expansion of the settlement boundary to accommodate this small site.</p> <p>Appendix 1 - Location Plan</p>  <p>The map shows the Clehonger settlement with a red outline indicating the current boundary. A specific site is highlighted in red within the settlement, representing the proposed expansion. The map includes labels for 'Clehonger', 'Clehonger VC Primary School', and 'Clehonger Park'. A north arrow and a scale bar are also present. The Collins logo is visible in the bottom right corner of the map area.</p>		

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			<p>Appendix 2 – Draft Proposed Layout</p>  <p>Appendix 3 – Summary Technical Site Assessment - see Response Log Appendix 2.</p>		
Parishioner 3	Policy C2, Plan 4	C	We are interested to know why our property is outside the boundary and what the implications might be, for our property and those in a similar position.	See response to comment by Parishioner 1 above.	See change in response to comment by Parishioner 1 above.
Golf Inns Limited (agent Savills)	Housing delivery (paras. 4.3-4.5, Table 1)	O	<p>On behalf of Golf Inns Limited, we are writing to respond to the consultation on the Draft Clehonger Neighbourhood Development Plan ('the draft NP'). Golf Inns Limited own the former Belmont Golf Course ('the site') which is partially located within Clehonger Parish.</p> <p>Site Context</p> <p>Our client's land is split between the parishes of Clehonger and Belmont Rural. The former Belmont Golf Course covers approximately 84 hectares (208 acres) of which around 40 hectares (99 acres) falls within Clehonger parish</p>	This comment addresses various aspects of the NDP's approach to housing delivery in support of an allocation of some 33 ha. of land in the north-east of the Neighbourhood Area for residential development, with an estimated capacity of 600 dwellings. The	<p>Amend the last sentence of paragraph 4.5 to read:</p> <p>The Local Plan Core Strategy is concerned to ensure that housing development in the identified settlements is proportionate to the size of the community and its needs,</p>

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			<p>boundary. Since the closure of the golf course in March 2014, the land has been used for livestock grazing purposes as has the area of land to the south of the former golf course. The site is adjacent to the city of Hereford which offers a range of services and facilities, therefore it is considered to be a sustainable and appropriate location for residential development. Additionally, the preferred route of the proposed Western Relief Road is currently proposed to bisect our client's land which we consider will improve accessibility to both the site and the western part of Hereford.</p> <p>In Savills' most recent representations to the Hereford Area Plan ('HAP'), we submitted a Site Location Plan which identified three potential development parcels (including the additional land parcel Bel08 which is allocated in the 'made' Belmont Rural Development Plan) within Belmont Rural parish, which could be developed for residential use. We also recently submitted representations to the County Council's Rural Areas Site Allocations Development Plan Document ('RASADPD') Strategic Housing Land Availability Assessment consultation, requesting that the part of the former golf course which falls within Clehonger parish is also assessed for residential development. We have attached the 'Revised Potential Development Parcels Plan' that was submitted with the RASADPD representations which shows the areas of land that are client is promoting. Site 4 falls within Clehonger's Neighbourhood Plan Area.</p>	<p>principal points made are responded to as follows:</p> <p>Planning positively for new homes: the cited paragraph from Planning Practice Guidance (PPG) refers to the specific situation where a qualifying body wants to benefit from the protection afforded by paragraph 14 of the National Planning Policy Framework. This does not apply here. PPG encourages neighbourhood planning bodies to plan to meet their housing requirement, and where possible to exceed it, a position which has already been reached in Clehonger (Paragraph: 103 Reference ID: 41-103-20190509). PPG also makes clear that there is no requirement to make specific provision for housing or to allocate sites to meet the requirement (Paragraph: 104 Reference ID: 41-104-20190509). In terms of meeting the basic conditions, PPG states that as far as national planning policy is concerned NDPs "should support the strategic development needs set out in strategic policies for the area, plan positively to support local development and should not promote less development than set out in the strategic policies" (Paragraph: 044 Reference ID: 41-</p>	<p>and contributes to improving community cohesion.* The NDP also wishes to ensure that housing development is proportionate in these terms. In view of this and the significant progress already made on housing delivery, no site allocations for housing are proposed in the NDP. As noted above, further dwellings are expected to come forward as windfalls, either within the Clehonger settlement boundary (as supported by policy C2) or in the wider countryside (under Local Plan Core Strategy policy RA3).</p> <p>* footnote: Local Plan Core Strategy paragraphs 4.8.15 and 4.8.18.</p>

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			<p>Revised Potential Development Parcels Plan Former Belmont Golf Course – February 2019</p>  <p>All of the sites identified on the plan enclosed are in Flood Zone 1 and seek to avoid other areas of environmental and heritage constraints which include the Grade II* listed Belmont House, Grade II listed Walled Garden and Stone and Plaque, Belmont House unregistered park and garden, woodland areas and the Site of Importance for Nature Conservation. Sites 1 to 3 are located within Belmont Rural parish and Site 4 falls within Clehonger parish:</p> <ul style="list-style-type: none"> • Site 1 (purple boundary) – 1 hectare / 2.5 acres • Site 2 (orange boundary) – 5 hectares / 12 acres • Site 3 Post 2022 Development Parcel (orange hatched boundary) – 11 hectares / 28 acres • Site 4 (blue boundary) - 33 hectares / 83 acres <p>By allocating Sites 1 and 2 in addition to site Bel08, it should provide sufficient development to enable the redevelopment of Belmont House in the short to medium term. Allocating Sites 3 and 4 will allow for the medium – long term</p>	<p>044-20190509). All of these criteria are met appropriate to the local context. For example, windfall development is supported inside the Clehonger settlement boundary – the drawing of which is itself a strategic requirement.</p> <p>Supporting strategic development needs: addressing housing land supply shortfalls at the County level is a matter for the Local Plan Core Strategy, which includes a mechanism to do just this at policy SS3. It is not an issue which NDPs can reasonably be expected to address on their own initiative, even for those which border Hereford. The minimum nature of the housing requirement is not in dispute and is clearly indicated as such in the NDP (for instance paragraphs 4.1 and 4.5). NDP policies do however serve to help define the meaning of sustainable development, including through the provision of the Clehonger settlement boundary, and thus provide an appropriate framework for the determination of planning applications in conjunction with the policies of the Local Plan Core Strategy.</p> <p>Land at Madley Road: in respect of this outline planning permission, a</p>	

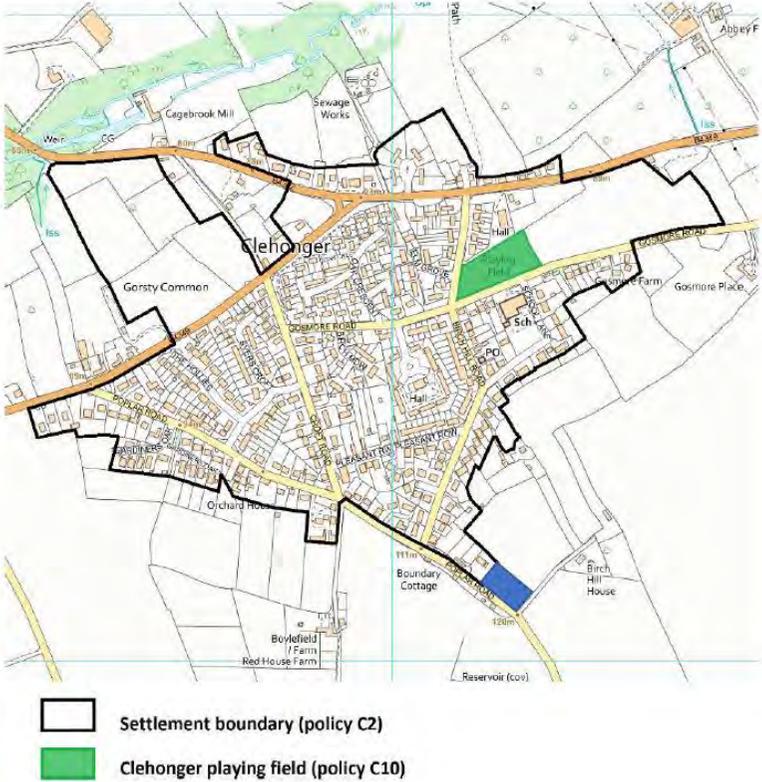
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			<p>delivery of housing to meet the current and future housing needs of Herefordshire without significantly impacting the residents of Clehonger Parish due to its distance from the settlement.</p> <p>Clehonger Draft Neighbourhood Plan Comments</p> <p>Housing Delivery</p> <p>Due to the rural nature of the NP plan area, the majority of the policies within the plan focus upon the settlement of Clehonger, particularly in relation to housing. Section 4 of the draft NP states that <i>“there is no requirement to provide for more housing in the Neighbourhood Development Plan”</i> as the minimum housing requirement of 109 dwellings has been met and exceeded by 103% with current permissions. We disagree with this statement and consider that the draft NP should still recognise the potential opportunity for further development sites during the plan period for those reasons explained below. The Planning Practice Guidance (‘PPG’) sets out that <i>“Allocating sites and producing housing policies demonstrates that the neighbourhood plan is planning positively for new homes, and provides greater certainty for developers, infrastructure providers and the community. In turn this also contributes to the local authorities’ housing land supply, ensuring that the right homes are delivered in the right places”</i> (PPG Paragraph: 096 Reference ID: 41-096-20190509). At present, we do not consider that the draft NP is planning positively for new homes.</p> <p>Policy RA1 of the Herefordshire Core Strategy (adopted in October 2015) states that a minimum of 5,300 dwellings are required between 2011 – 2031 in the County’s rural areas and the figures set out in the policy’s table state that “approximately” 1,870 dwellings will delivered within Hereford Housing Market Area (‘HMA’) (which Clehonger is part of). Clehonger is also identified in the Core Strategy as a settlement that will be the main focus of proportionate housing development within the Hereford HMA. Herefordshire County Council has also consistently failed to deliver a 5 Year Housing Land Supply¹. In light of this, Neighbourhood Plans around the County, especially those that are adjacent to Hereford City (the most sustainable settlement in the County), should be delivering more housing than set out in Core Strategy to make up for the consistent shortfall and provide the housing that is required to meet current and future needs. We therefore consider that the 109 dwellings to be delivered in Clehonger is a minimum and, if sites come forward within the plan period in sustainable locations within the Parish, they</p>	<p>reserved matters application is currently being prepared by Stonewater Ltd. and Engie Regeneration Ltd. A presentation was made to the Parish Council in June 2019 by Stonewater and their planning advisers. Pre-application discussions have taken place with Herefordshire Council. It has been confirmed that the cost of necessary upgrade works to the local waste water treatment works will be met by Gladman Ltd (the promoters of the outline permission). It is reasonable therefore to assume this scheme will proceed. In any event, housing delivery without this development would stand at 136 units at April 2019, including a windfall allowance (which amount is not disputed). This is well above the minimum requirement of 109 dwellings.</p> <p>Proposed site: the scale of development already provided and committed at Clehonger is such that it is not necessary to allocate a reserve site or sites to provide surety that the minimum housing requirement will be met. In any event the proposed site:</p> <ul style="list-style-type: none"> • Lacks any discernible relationship to Clehonger village and its 	

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			<p>should not be refused purely on the basis that Clehonger parish is currently expecting to deliver 97 dwellings more than its minimum requirement (excluding windfall allowance).</p> <p>Additionally, in relation to the committed developments which are set out in Table 1 of the draft NP, although we consider that Land at Madley Road for 90 dwellings (application reference 141964) may still be delivered by 2031, we have concerns with regards to its anticipated deliverability. For example, a reserved matters application must be submitted by November 2020 or the outline planning permission (application reference 141964) will expire. It is also noteworthy that land at Madley Road was recently the subject of a refusal at appeal when the applicant submitted a discharge of condition application (LPA reference: 171662) to address one of the key issues identified when the outline application was determined at appeal, this being its impact upon the Clehonger Waste Water Treatment Works. Unless this issue can be resolved, any future reserved matters application is unlikely to proceed, meaning the total permissions within the plan period would stand at 116 dwellings and not 206 dwellings which is a potential risk</p> <p>This emphasises the need for the emerging Clehonger NP to be sufficiently flexible to respond to potential changing circumstances in housing delivery. Such flexibility is essential to ensure the draft NP meets the 'basic conditions' by supporting, and not undermining, strategic development needs set out in the Core Strategy, which identify minimum housing requirements, and positively supporting local development, in accordance with national planning policy (paragraphs 13 and 29, the National Planning Policy Framework 2019) [Savills emphasis].</p> <p>In order to support the strategic objectives of the Core Strategy, and respond positively to changes in housing delivery throughout the plan period, it is recommended that the former golf course (Site 4) is allocated as a potential reserve site / for housing, being capable of delivering approximately 600 dwellings (30 dwellings per hectare over 33 hectares at 60% capacity) through the plan period.</p>	<p>services and facilities;</p> <ul style="list-style-type: none"> • Is poorly-related to Hereford until other significant development and infrastructure is completed; • Is excessive when compared to the scale of proportionate housing growth envisaged for the Neighbourhood Area by the Local Plan Core Strategy. <p>In light of this comment and the points made, a change is proposed to the last sentence of NDP paragraph 4.5, in order to clarify the intent of the approach to housing delivery and to provide a link to Local Plan Core Strategy themes of proportionate development and community cohesion.</p>	
	Policy C3	O	<p>Policy C3 requires that on residential sites <i>"the affordable units should be distributed across the site"</i>. The location of affordable dwellings should be considered on a site by site basis, having regard to individual site constraints and prevailing market circumstances. We therefore consider that the policy</p>	<p>Whilst the need to avoid being too prescriptive in policy is understood, the other side of the coin is to frame policies so that they are</p>	<p>No change.</p>

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Clehonger draft NDP
			<p>should be amended to include 'where possible'.</p> <p>The Policy then goes on to state <i>"proposals that seek to concentrate different types and tenures of homes in separate groups on site will not be supported"</i>.</p> <p>Paragraph 16 of the NPPF requires plans to be prepared positively however we consider that Policy C3 is negatively worded, inflexible and overly restrictive. Paragraph 13 of the NPPF states that NPs should <i>"support the delivery of strategic policies contained in local plans or spatial development strategies"</i>. Policy H1 and H3 of the Core Strategy set out that the amount and mix of affordable and market homes on site will vary depending on evidence of housing need and the viability of the development. We therefore do not consider that Policy C3 complies with the strategic objectives of the Core Strategy or the NPPF and has the potential to constrain the delivery of sustainable development within the NP area.</p>	<p>precise. PPG says "a policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications" (Paragraph: 041 Reference ID: 41-041-20140306).</p> <p>Policy C3 as drafted meets this test. Regarding a supposed lack of flexibility, it is hard to suggest circumstances which would require affordable housing <u>not</u> to be distributed across a site. No examples are given in the comment. The planning system has a degree of built-in flexibility in that planning applications are to be determined in accord with the development unless material considerations indicate otherwise. In this context, draft policy C3 does not require amendment.</p>	
	Policy C5	O	<p>Part of our client's land is located within Belmont House unregistered park and garden. The preferred route of the Hereford Bypass, discussed below, is proposed to bisect the unregistered park and garden and our client's land. We have demonstrated in previous representations to Herefordshire County Council that once the road is constructed, this will lower the sensitivity of the surrounding landscape as a consequence of the fragmentation, loss of landmark features, diminished scenic quality of the area, reduced levels of tranquillity and disruption of key views. Therefore, the landscape will be significantly altered and any development within or adjacent to the unregistered park and garden should be assessed against the altered significance of the non-designated heritage assets and the benefits of the</p>	<p>Comments re loss of significance are noted. This can only be assessed when detailed proposals are made in respect of this section of the Hereford bypass scheme. Policy C5 as drafted is able to take any such reduced significance into account.</p> <p>On enabling development, the National Planning Policy</p>	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Clehonger draft NDP
			<p>proposed scheme.</p> <p>In relation to the wording of Policy C5, reference should be made to the enhancement of historical assets through rejuvenation and enabling development. Our client's own Belmont House (Grade II* Listed) and substantial works are required to repair it and bring it back into use. English Heritage (now Historic England) have previously written to our client to state that due to the financial scale of the problem, they were unable to offer a grant of the size required therefore the solution to the problem was through enabling development, by dividing the house into a number of large apartments and building a small development in the grounds. We recommend that the following sentence should be incorporated within Policy C5, "<i>Future development of the former Belmont Golf Course will be supported if proposals help to secure the future of Belmont House and other nearby heritage assets</i>".</p>	<p>Framework (para. 202) sets the national approach. Locally, policy 3 of the Belmont Rural NDP supports enabling development of the Belmont Golf Course site for a wide range of uses provided criteria are met. This made policy applies to a substantial area of land (some 12.9 ha.) around Belmont House and its surrounding outbuildings. In light of this provision and the stated national approach, no further reference to enabling development is required in the Clehonger NDP.</p>	
	Policy C11	O	<p>We welcome this policy on the Hereford Bypass, however we consider that more recognition is required within Policy C11 in respect of the development potential that the relief road will unlock in the eastern part of the parish, once constructed. Policy C11 currently focusses upon the road itself but we consider that the policy should also reflect on the potential for the road to make the eastern part of the parish more accessible and suitable for residential development. It is therefore recommended that the Policy wording is expanded to recognise that "<i>sustainable developments proposals which come forward on land adjacent to the Hereford Bypass will be supported where they comply with other policies within the NP</i>".</p>	<p>It is considered that this prospect is speculative at the present time and does not merit amendment as suggested.</p>	No change.
	Community Actions	O	<p>Development of our client's land could also assist in meeting some of the Community Actions listed in Table 3 of the draft NP document and as it is adjacent to Hereford City it should have a limited impact on Clehonger settlement, as facilities and services offered in Hereford City are closer.</p>	<p>Noted.</p>	No change.
Parishioner 4	Policy C2, Plan 4	O	<p>The small piece of land to the west of No. 2 Gardiner's Oak should be designated as a brownfield site within the settlement boundary because it is (i) served by an electricity sub-station, a continuation of the tarmac road and the main sewer for Gardiner's Oak; (ii) overlain by varying depths (up to 1.5m) of subsoil containing demolition/construction waste.</p>	<p>The western boundary of the Gardiner's Oak scheme as now defined on the ground and in the proposed settlement boundary follows the grant of planning</p>	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Clehonger draft NDP
				permissions in 2015 and 2016 to regularise the use of former paddock land as residential curtilage to Nos. 1 and 2. As a result there is a clear physical boundary to the built-up area, from which this land is excluded. The settlement boundary as drawn appropriately reflects the built form of the settlement.	
Parishioner 5	Policy C2, Plan 4	O	Please find attached taken from draft plan Clehonger NDP page 14, letter received in post yesterday requesting feedback. I've highlighted in blue the absence of my land & suggest its inclusion in the plan as it moves forwards as this would provide a rounding off of this development area.	This site is a small (0.27 ha) field with hedge and fence boundaries, including to Poplar Road, in an elevated position above the village. To the north west it adjoins a residential curtilage which is in the proposed settlement boundary. A dwelling on the other side of Poplar Road opposite the site is outside the proposed settlement boundary. The site is outside the built-up area as such, to which there is a clear physical boundary represented by the property curtilage to the north west. The settlement boundary as drawn appropriately reflects the built form of the settlement. In addition, the view from the field gate at the site's southern corner, looking north over site and the village towards the River Wye, is proposed to be protected by policy C4 (view 3B).	No change.

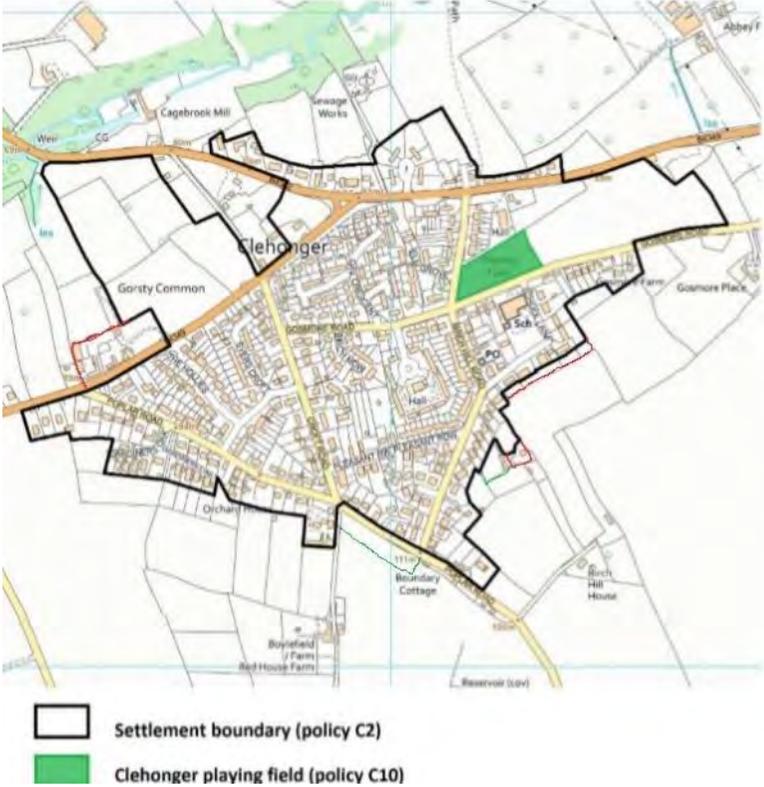
Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Clehonger draft NDP
					
Parishioner 6	Para. 2.7	O	Clehonger has a 7 day a week bus service with 3 return journeys to Hereford and Hay on Sundays.	Agreed – the 39A service runs on Sundays.	Amend to confirm bus service availability is seven days a week.
	NDP	C	When is the bus stop opposite Seven Stars agreed with the developer due to be opened?	This is outside the scope of the NDP.	No change.
Parishioner 7	Policy C2, Plan 4	O	Thank you for arranging an open event for the public to attend and comment re the draft Neighbourhood Plan. I felt extremely sorry for you with the low	The properties and adjoining land referred to at Walnut Tree Farm	Amend Clehonger settlement boundary (Plan 4) to include Walnut

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Clehonger draft NDP
			<p>turnout. A lot of work by you all went into the draft plan and the meeting, its been a lot of work by such a small band of members. Thanks also for the refreshments they were lovely.</p> <p>As it stands I can not support the plan but as it's a draft you said to write and share my concerns. Firstly and very strangely my extremely close neighbours are in the plan and I'm not. When you look at this side of the village I'm the only one not in the envelope. On closer inspection there are the odd houses not included in Birch Hill or Poplar road but these are the opposite side of a road, which is not the case where I am located. I pointed it out to Mrs Carole Protherough, chairperson of the Parish Council and she agreed it was odd and should be amended. I also noted that Garnom Bungalow in its lofty position on Birch Hill and quite near to the top of the hill on the bank is included and my home is in the low-lying area In a position much more favourable to be included in a village envelope, very odd? You've also not included my outbuildings and storage area, which I've now submitted a planning application for, Planning Application P192513/F. I enclose a copy of plan with the area highlighted in green and my own house in Red. Obviously I would like both areas included in the final plan.</p> <p>Section 4.1 reads: The Local Plan Core Strategy requires the Neighbourhood Development Plan to make provision for at least 109 new dwellings between 2011 and 2031. - I feel that this sentence lacks clarity and feel that it should be re written "The Local Plan Core Strategy requires the Neighbourhood Development Plan to make provision for a minimum of 109 new dwellings between 2011 and 2031, with no upper limit set". This would make it more clear that a good village envelope that could sustain a breach is needed as once the envelope is broken it sets presidents.</p> <p>Section 4.9 Reads: New housing will be supported inside the settlement boundary where it is appropriate to its context and respects local character, including the nucleated settlement pattern, and meets local needs and demand. Proposals for other development such as small-scale employment will be considered against the policy criteria. Policy C6 sets out requirements in respect of design and access. -You have merely drawn a line around the existing properties with out any provision for any growth at all. Parishioners</p>	<p>are in a low-lying position adjacent to the proposed settlement boundary. It is agreed they should be seen as part of the main built up area of the village, with defined boundaries to agricultural land. The settlement boundary should be amended to appropriately reflect the built form of the settlement.</p> <p>The factual amendment to para. 4.1 is agreed.</p> <p>The purpose of the settlement boundary is to define the main built up form of the village, including existing development as well as any proposed site allocations. In the case of Clehonger, no site allocations are proposed. In respect of the other areas suggested for inclusion:</p> <p>Shark House and barn: see response to comment by Parishioner 1 above.</p> <p>South of Poplar Road: this frontage land is outside the main built up area in an elevated position. Existing clear physical boundaries (track to Red House Farm/Poplar Road) would be breached, contrary to HC guidance.</p> <p>Rear of School Lane: the boundary</p>	<p>Tree farmhouse, outbuildings and adjoining land as identified in the comment.</p> <p>Amend para. 4.1 as indicated.</p> <p>See change in response to comment by Parishioner 1 above.</p> <p>No change.</p> <p>No change.</p>

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Clehonger draft NDP
			<p>were asked at an open day to stick flags where they thought it was appropriate where house building might be considered, none of these flagged areas seem to be included and who decided they were not to be? This is meant to be our village plan and it feels more like a plan to make sure the drawbridge is up and no more here please. We are considered to be a hub village, extremely close to a city, I'm disappointed with this approach. The windfall comment in Appendix B needs reassessing as it states: This represents a reliable source of supply at an average of 5.1 units per annum. Windfalls are expected to continue to occur in the remainder of the plan period to 2031. However, the policies of the NDP will enable a more plan-led approach which will act to reduce windfall supply. A conservative assumption is made therefore that windfall supply 2018-2031 will be 25% of the recent delivery rate, i.e. 1.2 units per annum or 16 units over the period. With Welsh water saying there is no availability in the sewage works for anymore connections any small/ meduim garden that may have a windfall site cannot be joined to the mains sewage. If there is room for a small house this loss of a garden would not be big enough for private drainage and the spreaders required as well. Any idea that a small/meduim sized garden could be a potential building plot is ruled out thus its an unreliable source of growth and the 16 units that might have been available will not be. This figure of 1.2 units per year should not be included in any hypothetical assumptions. Its also not ideal planning losing gardens to family sized homes leaving them with nothing more than a parking space.</p> <p>The large development sites that are started and planned have negotiated with welsh water and they will only be paying for the upgrade of sewage works for the amount needed for their sites. There will be no spare or additional capacity paid for by them With this in mind we will either be heading for another application from a huge development that will test the new envelope as they have the necessary funds and will pay for new availability at the sewage farm. Far safer we should be one step a head and carry out the wishes of recent surveys/questionnaires that there be some small developments sites on the edge of the envelope where private drainage can be used. Its much better to give a little bit at the edges than lose an even larger bit. Once the envelope is broken it will set a president and will cause the firewall to collapse. No drawbridge can sustain an attack from the big</p>	<p>has been drawn to limit the scope for backland development, following the settlement boundary defined in the former Herefordshire Unitary Development Plan.</p>	

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Clehonger draft NDP
			<p>developers with the huge target the Councils and governments have set.</p> <p>As for your inclusion of figures of the houses we have or will be built, these are only houses that we should have built in the last fifty years. We have had a huge period of non growth in this village which caused the closure of two village shops a garage and a school that is now populated from the area close to us known as Belmont. When my own daughter attended Clehonger School 89% of pupils were from outside of our village, which was the only thing that stopped and is stopping our village school from closing. These figures should be discounted as they only deliver the ones that should have been built during this fifty year time period. People are not leaving there family homes when the children have left the nest, we are now a village of happily settled couples or single people whose children left three, four or five decades ago. The great disadvantage of healthy living and longer life spans is a house may now be sold one every seventy years.</p> <p>Due to the strong campaign from some groups in Herefordshire, its clear our much needed bypass/relief roads will be cancelled, which as you know I supported as long as there was no felling of beautiful trees. The backlash to the conservative vote in the district election (due mostly to Mrs May's botched Brexit.) has accidentally led to an administration in Hereford that may reverse the detailed planning over many years for the much needed bypass and land for growth. This will mount more pressure on villages to provide even more housing so we must show that our new Village Envelope can expand gently without another massive development thrown at us. To ignore this will cause a breakdown of the envelope and it will become null, void and a worthless piece of paper. Aside to this when two or three houses are built close to already established housing, the people moving in integrate better and quickly join in a village. When the two new estates have been built because of there size people tend only to get to know there immediate neighbours, which are new as well and they don't necessarily find out or enjoy the benefits of the wider village or community. I have also looked at the envelope on other roads and wonder why a small amount of roadside frontage could not be included from Red house Farm up towards Birch Hill. If we allowed frontage there, so that no future access could be given to the land behind it could stop an even bigger estate being plonked there in future years,</p>		

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			<p>this I have also shown in green.</p> <p>I also note shark House and the barn is not included in the envelope and can't see why these shouldn't be included as well. I have included these in red. I also have noted some gardens in school lane have been cut in half, making no sense at all so I've included those in red.</p> <p>I know we are all passionate about our village, we all have different views and I'm mindful that my views are more progressive than some of you on the NP committee but I hope that when the plan is in its final stages its one that can be seen as allowing some growth in a way that is comfortable to us all.</p> <p>I hope you allow this letter rather than the comment form as its not got enough room for me to write on!</p>		

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Clehonger draft NDP
			 <p> Settlement boundary (policy C2) Clehonger playing field (policy C10) </p>		
Parishioner 8	Para. 3.9, policy C1	C	The scale and size of particularly the permission and proposed Pegasus developments surely fall outside the parameters of a sustainable increase. They are also contrary to the local survey which wanted smaller developments.	The NDP records the current position regarding housing completions and commitments (planning permissions) and provides a settlement boundary for Clehonger which will define the planned extent of the village for planning purposes in the period up	No change.
	Para. 4.3	C	Clehonger has been impressive in providing 103% more than central government indicated in just 7 years. With 13 years still to run in the 20-year period our NDP should strongly reflect the facts of our over achievement.		

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Clehonger draft NDP
	Policy C2	C	It seems bizarre that the area of Gorsty Common could be deemed as non-countryside and areas the other side of a line to be countryside where development is considered unsustainable. This seems a very odd position as the area has been countryside grazing agricultural land for generations. I realise this reflects a strange decision made at County level which unfortunately has led to the unsustainable Pegasus proposed development.	to 2031.	
	NDP	C	The Clehonger NDP unfortunately has been created several years too late. Particularly in regard to the number and size of developments that have been passed by Hereford council which has meant exceeding by 103% or 113 more houses which were set out as sustainable and required growth in their plan. We are heading for an 40% increase on the property numbers in Clehonger from the 2011 base! I would suggest that this level of increase will put great pressure on local resources, add significantly to traffic congestion, vehicle journeys through Clehonger and noise and air pollution. Hopefully the implementation of the NDP will create a small barrier to particularly larger scale developments. Anything that makes the permission and proposed Pegasus developments less likely in the future should be welcomed.		
Parishioner 9	NDP	C	We would like to start by congratulating you all on producing this consultation draft and presenting it in the way you have. In essence it is a strong progressive, thoughtful all-encompassing plan. This plan is not worth the paper it is written on IF it is NOT fully adhered to without outside interference. Any external meddling by District or planning authorities would negate all the hard work Clehonger Parish council and members of the public have put into this project. We would like to add our support to the project with the following observations, recommendations and concerns regarding the above document. We list below comments that are not necessarily in order of importance but as they have occurred to us on reading through the document. As stated in our opening paragraph how enforceable and binding is this document? Can planning officers overturn the wishes of the parishioners and grant permission for dwellings or other development to be installed outside of this proposed plan? If so what is the point of undertaking all this work.	This support for the NDP is welcomed. Once finalised (made), the NDP will be part of the statutory development plan. Planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Clehonger draft NDP
	Vision	C	Good quality development. This is most desirable but sadly we note with the new development on the land adjacent to the Seven Stars public house (I refuse to call it Pembridge Court) is not Good quality development . We appreciate that the parish council along with ourselves sent in observations and suggestions during the planning stage but as usual with a planning office that is not accountable to the people our wishes were ignored and therefore poor quality housing with high density and weak road infrastructure has been approved. Would this interference be a feature we could expect in the future or will this development plan be paramount and planning authorities have to observe it.	As noted above, planning applications must be determined in accordance with the development plan (which will include the NDP) unless material considerations indicate otherwise.	No change.
	Policy C1	C	The development currently being undertaken on the land adjacent to the Seven Stars public house is a case in question. The housing here is not affordable particularly for first time buyers and locally born residents. It is a modern shantytown with many known building regulation and construction faults. We believe problems within this development will never be rectified and will become future problems for the parish council and ratepayers. There are many dwellings within the proposed development plan owned and occupied by residents whose families have grown up and left home and thereby living in good family accommodation that could be freed up if there were to be built alternative smaller bungalows (single storey not dormer) type or gated communities where residents approaching retirement or even in retirement would feel safer less bothered by modern traffic, antisocial behaviour and other life styles. No housing of this type is proposed. We do not object to sensible well laid out planning but today we see dwelling density as well as access roads to be debilitating within the development. Years ago utility company's for example had compounds where their vans etc were parked over night, today staff are allowed to take these vans home freeing up van parking at the depot but increasing the on street parking on any development. Also with parents having choice where their preferred school is concerned, means that there must be an additional vehicle for the school run at every house where a child of school age lives and all the problems that brings to the local area and environment. New houses within a development must in our opinion have sufficient off road parking to match that of the number of bedrooms	The NDP includes policies on housing mix and on design which address the points raised.	No change.

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			the dwelling has and planning permission to convert garages into accommodation should only be granted if sufficient off road parking can be maintained.		
	Para. 4.1	C	The core strategy requires, no obliges this parish to except a minimum of 109 dwellings to be built between 2011 and 2031 and your document states that Clehonger Parish has had to except through planning approval being granted an excess of this by 103%! Therefore we feel that this new proposed Neighbourhood Development Plan should stand not until 2031 but until 2041. This would permit the parishioner's time to absorb the enormous upheaval 222 additional dwellings places on the village infrastructure and its environment. Although the current owner of The Village Stores has undertaken to turn around the fortunes of himself and the village, more facilities are needed for a village the size of the one proposed within the development Plan.	The NDP has been prepared to be in line with the Herefordshire Local Plan Core Strategy which runs to 2031. Housing requirements beyond this date will be determined through a future Core Strategy review. Community facilities are addressed in NDP policy C9.	No change.
	Policy C2	C	We would not like to see any speed limits within this boundary altered, moved or replaced as once a 30mph speed limit is applied (all the recently changed 40 mph to 30mph roads have resulted in these large housing developments) it is nearly impossible to object on any highway grounds. Also vehicles can park on roads with a 30mph speed limit without lights! Speed limits only work if they are enforced and to date we have only observed a police speed enforcement team once since the B4349 was changed from 40mph to 30mph!	Noted. The setting of speed limits is outside the scope of the NDP. Community Action CA1 explains that the Parish Council will continue to work with partners to seek the enforcement and further introduction of speed limits.	No change.
	Policy C11	C	We fully endorse the eight comments you have listed and although we are now retired and no longer need to be at a place of work at a given time we fully support the need for the bypass. With the additional housing being planned for Clehonger, Kingstone and further afield the second crossing of the river Wye and the bypass becomes essential. Therefore with the above comments and observations we congratulate Clehonger Parish Council.	Noted.	No change.

Appendix 1: revised draft NDP Appendix B

Completions 2011 - April 2019

Address	Proposal	No. of units (net)
Plot adj. Silverdale, Clehonger	Erection of detached house	1
Yew Tree Farm, Poplar Road	Proposed four dwellings	4
Plot adj. Meadow View	Erection of energy efficient passive house	1
Site adj. 13 Gosmore Road	Three-bedroomed house	1
Silverdale, Clehonger	Conversion of coach house	1
Land adj. Landimore, Poplar Road	Five houses	5
Land off Gardiners Oak	Four detached bungalows and garages	4
Clehonger Manor	Certificate of lawfulness	2
Land adj. to Garnom Bungalow	Three dwellings	1
Land between Gosmore Road and the Seven Stars PH, Clehonger	Residential development for up to 80 houses	36
Land to rear of Bine Cottage	Five dwellings	3
TOTAL NET COMPLETIONS		59

Commitments as at 1 April 2019

Address	Proposal	No. of units (net)
Land adj. Glasnant House	Four dwellings	4
Land at Walnut Tree Farm	Two dwellings	2
Land to rear of Bine Cottage	Five dwellings	2
Land between Gosmore Road and the Seven Stars PH, Clehonger	Residential development for up to 80 houses	44
Land off Madley Road, Clehonger	Site for residential development of up to 90 dwellings	90
Land adj. to Garnom Bungalow	Three dwellings	2
Harp Acre, Clehonger	Residential development of 3 bungalows	3
Land at Wellfield, Poplar Road	Demolition of agricultural buildings and erection of up to five dwellings	5
TOTAL NET COMMITMENTS		152

Windfall allowance

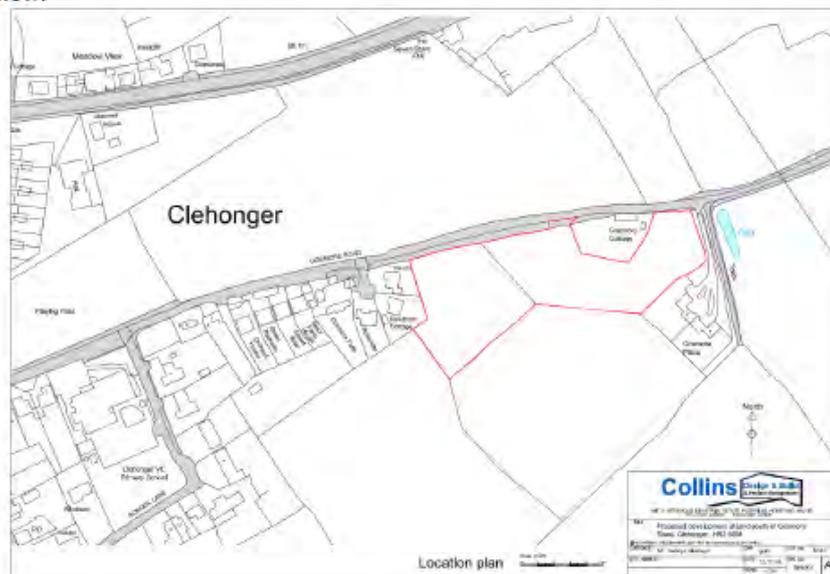
A total of 41 windfall units have been built or come forward since 2011, excluding the two larger sites at Clehonger. This represents a reliable source of supply at an average of 5.12 units per annum. Windfalls are expected to continue to occur in the remainder of the plan period to 2031. However, the policies of the NDP will enable a more plan-led approach which will act to reduce windfall supply. A conservative assumption is made therefore that windfall supply 2019-2031 will be 25% of the recent delivery rate, equivalent to 15 units over the period.

Appendix 2: Appendix 3 to objection by Collins Design and Build

Appendix 3 - Summary Technical Site Assessment

Site Location and Description

The site comprises of a small paddock and small part of a larger agricultural field located immediately south of Gosmore Road (U73239) in the south eastern corner of Clehonger. Immediately west is a small oval cul-de-sack of four detached properties, dissecting the site to the east is a detached property (Gosmore Cottage) beyond which is a pair of semi detached properties (Gosmore Place). North is the Persimmon Homes development currently under construction. The site is marked with a red outline on the aerial image below.



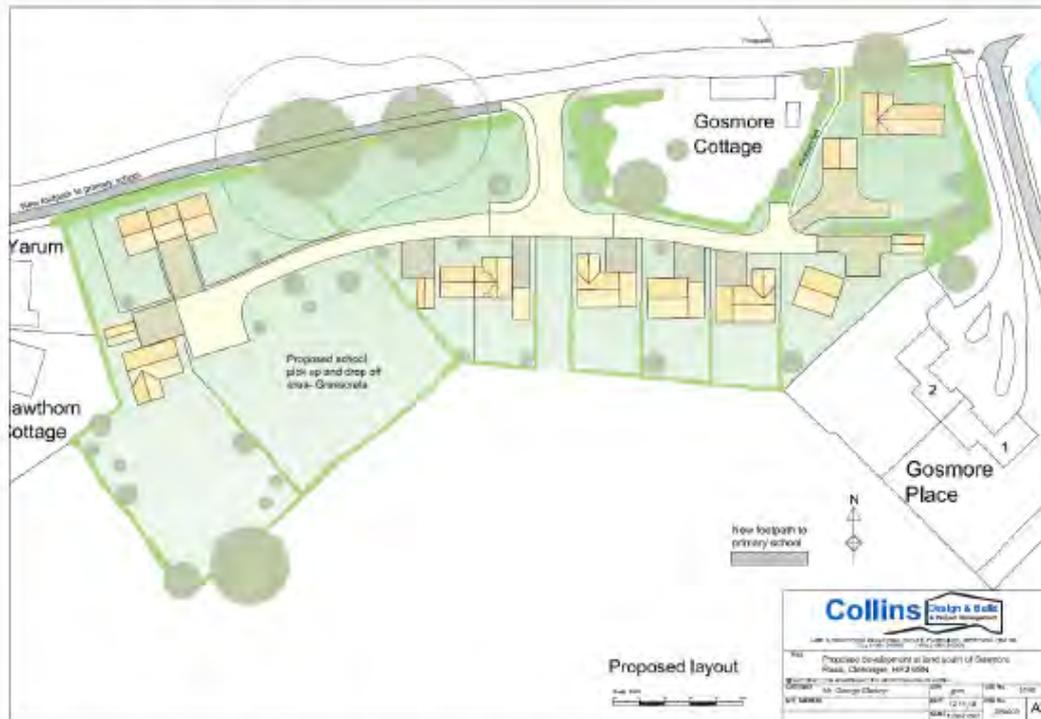
The site is served by a field access off Gosmore Road and public footpath number CH12 runs along part of the eastern boundary northwards across Gosmore Road.

Persimmon Homes are in the process of constructing 80 dwellings on land immediately north of the site. Below is a copy of their approved reserved matters layout.



The Proposal

This proposal is for the construction of up to ten dwellings and bungalows. The indicative mix set out on the accompanying layout plan comprises a mixture of two, three and four bed semi-detached, detached and bungalows with the focus being on smaller two and three bed properties.



The existing access into the field would be used and upgraded to adoptable standard including and turning head. The road is offset to safeguard the root zone of the large oak trees.

A potential area is also to be dedicated as a school overspill parking area. Foul drainage will be a private package treatment plant and soakaways until such time as capacity becomes available in the public sewerage network.

Technical Considerations

The development area has been carefully considered to form a logical extension of the settlement. The southern boundary follows the existing southern field boundary defined by

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a native hedge continuing eastwards to effectively infill a gap between existing properties at the eastern end of the site.

The pattern of development west of the site is also very mixed and adhoc in term of the size, design, scale and orientation of houses. Houses are generally linear in layout following and addressing the roads that they gain access from. This form of development is repeated in the Persimmon Homes development. In this regard, the layout is in keeping with the existing character and pattern of development.

Existing properties in the south side of Gosmore Road are predominantly detached and semi-detached properties set within reasonable size plots. The proposal also harmonises with this existing pattern, character and density of development. The layout also provides all plots with a direct southerly aspect to take advantage of passive solar gain.

As the site will be enclosed on three sides with existing and proposed new housing, visually, the development will assimilate with this residential context. The site also has no landscape designation and with new hedge and tree planting along the southern boundary, the development will have negligible impact on the Principal Settled Farmlands landscape character type.

The site is actively farmed and grazed with livestock. It is therefore of low ecological value and the development will offer opportunities to enhance the ecological value of the site through new native tree and hedge planting.

A safe access can be provided with new footpath connections along Gosmore Road to local amenities and the school. The layout also includes a connection on to public footpath CH12 running north into the Persimmon development.

The development also can also provide an overflow car park for the school particularly during pick up and drop off periods. This will have capacity for approximately 30 cars and could also be used when events are held at the school. It is envisaged this will have a porous reinforced grassed surface such as grasscrete

Surface water will be managed through infiltration largely on plot. As there is presently limited foul drainage capacity in Clehonger, a communal package treatment plant is proposed and ample land exist south of the development area to accommodate the required soakaway and we have already verified that the ground conditions will support soakaways.

