Bridstow Neighbourhood Development Plan



Consultation Statement – November 2020

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Section 1: Introduction

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

Guidance from Department for Communities and Local Government states that: *'the Consultation Statement submitted with the draft Neighbourhood Plan should reveal the quality and effectiveness of the consultation that has informed the Plan proposals.'*

Public and stakeholder input was taken into account throughout the development of the plan. Specific examples of where and when this has happened are highlighted in the timeline below with relevant extracts from, or references to, steering group/working group and Parish Council minutes. For the sake of brevity, not all instances are listed, but are available by searching the full set of minutes on the NDP website as indicated.

- c. This Statement sets out details of all consultation and engagement activity. It lists how the local community and other stakeholders have been involved and how their input has informed the development of the Plan.
- d. The aim of the consultations in Bridstow Parish has been to ensure the widest possible understanding of the purpose and content of the Neighbourhood Plan, and to ensure that every resident and stakeholder had the opportunity to contribute to the development of the Plan.
- e. This Statement demonstrates that there has been extensive community and stakeholder engagement and consultation throughout the process. The evidence to support all the statements regarding consultation is summarised below.

Section 2: Bridstow NDP Consultation Timeline

<u>Note:</u> Although the Bridstow NDP process began in 2013, progress slowed at a number of stages. This was mainly due to the difficulties encountered in identifying suitable sites for housing developments, given the considerable constraints, particularly those relating to highways and landscape. The Parish is crossed by two trunk roads and lies within the Wye Valley AONB. Delay in finalising the Local Plan (Core Strategy) added to the problem in that the policy for proportional housing growth witinh the villages was changed. The Local Plan was not "made" until 2015.

1	2 nd August 2013	Application from Bridstow Parish Council to Herefordshire Council for the whole Parish Council area to be designated as a
	Parish Council	Neighbourhood Area following preliminary discussions with association of Local Councils and Herefordshire Council's Neighbourhood Planning Officer.
		https://www.herefordshire.gov.uk/download/downloads/id/9346/neighbourhood_area_application_form.pdf

2	6 th August to 20 th	Designation consultation period opened and closed with no representations having been received.
	September 2013	
	Herefordshire	
	Council	

3	23rd September	Designation confirmed.
	2013	
	Herefordshire	https://www.herefordshire.gov.uk/download/downloads/id/9344/decision_document.pdf
	Council	

4	16 th July 2014	Press report in Ross gazette re developing the NDP
	Parish Council	

5	21 st July 2014	Parish Council resolved to form a NDP Steering Group
	Parish Council	

6	4 th September 2014	Steering Group formed and held its first meeting comprising 11 members of which 2 were Parish Councillors
	Steering Group	

7	September/	Facebook page and Twitter account established that were used to publicise the NDP (and other Parish matters in
	October 2014	order to encourage use).
	Steering Group	Facebook page: https://www.facebook.com/Bridstow-and-Wilton-Neighbourhood-Development-Plan-
		300064756856138/
		Twitter: <u>https://twitter.com/bridstow?lang=en</u>

8	September/	NDP Launch event publicity via letter/flyer; Ross Gazette; Facebook & Twitter
	October 2014	
	Steering Group	

9	23 rd November 2014	Launch event held in Bridstow Village Hall to inform residents about the NDP following. Included a competition to design the
	Steering Group	NDP logo.

10	2 nd July 2015	Steering Group terms of reference agreed.
	Steering Group	

11	January/February	The Steering Group distributed and collected a Resident's Questionnaire prepared through discussion at previous meetings in
	2016	order to identify issues that the community felt might be covered in the NDP. This had a response rate of 55%. The Resident's
	Steering Group	Survey Report (together with a separate report containing comments) can be found among documents at
		http://www.bridstowparishcouncil.co.uk/neighbourhood-plan-2019/4594379561
		A Youth Forum was also held and the feedback can be found on the above page link.

12	May 2016	NDP website pages established on Bridstow PC Website:
	Steering Group	http://www.bridstowparishcouncil.co.uk/neighbourhood-plan/4588971356

13	May/June 2016	The Steering Group distributed a leaflet to households within the Parish promoting a consultation event feeding back the results of the Resident's Survey and seeking advice upon objectives and policy directions.
		BRIDSTOW NEIGHBOURHOOD DEVELOPMENT PLAN
		Consultation on Vision, Issues and Options
		Bridstow Neighbourhood Development Plan is a new type of planning document introduced by the Localism Act of 2011. It is enables local communities to make a significant contribution to some of the planning decisions about how their areas.
		The Steering Group preparing the Neighbourhood Plan is now seeking your views upon the direction it should take. A range of issues are presented upon which your comments are sought.
		The Plan will need to set out a vision with a number of objectives. These are based upon the residents' survey undertaken in February 2016. They cover the environment, housing, the local economy and services.
		Herefordshire Core Strategy, to which the Neighbourhood Plan must conform, identifies the settlements of Wilton and Bridstow as locations where new housing should be located.
		Some 50 new dwellings must be provided for and settlement boundaries defined for the Parish's villages.
		How these should be accommodated needs to be determined.
		You are invited to give your views on the initial vision and objectives and approach to accommodating development, in particular where housing might take place at a Parish Consultation event that will take place in Bridstow Village Hall on
		Friday 8 th July between 6.00pm and 8.00 pm and Saturday 9 th July between 10.00am and 12.00pm

14	8 th and 9 th July 2016	NDP Event Open Day: The Steering Group held the consultation event on the results of the Resident's Survey and seeking
	Steering Group	views upon objectives and policy directions which were devised from the survey's results. The event provided sheets upon
		which residents were able to mark their support or otherwise and to add comments through 'post its'.





The analysis of results from the event can be seen at (2017 NDP Minutes page under <u>RESUL</u> <u>http://www.bridstowparishcouncil.co.uk/neighbourhood-plan-2017/4588971356</u>)	<u>TS</u> – at:

15	July 2016 – January	The Steering Group met monthly to undertake work upon finalising objectives and drafting policies informed by previous
	2017	consultations. All meetings were open to the public and well attended.
	Steering Group	

16	January 2017	On advice from Herefordshire Association of Local Councils and Herefordshire Council the Parish Council agreed that the Steering
	Parish Council	Group should become a Working Group of the Parish Council with the Chairman becoming a Co-ordinator. Subsequently new terms
		of reference were agreed. These (Bridstow NDP Group TOR 28 Sept 2017) can be viewed at
		http://www.bridstowparishcouncil.co.uk/neighbourhood-plan/4594877372

17	February 2017 to	The Working Group met generally on a monthly basis with its work concentrating upon assessing sites, including
	April 2018	through deciding criteria and the weight to be attached to them.
	Working Group	

18	April 2017	Meetings were held at which landowners/developers were able to present their proposals for submitted sites. These were
	Working Group	open to the public and well attended.
		Fresentation of Sites meeting 20 th April 2017

19	21 st May 2018	The Parish Council thanked the Working Group for its efforts in producing an initial draft plan, for work it had undertaken in
	Parish Council	seeking sites, and in producing an approach for assessing sites. It was felt that the work should now proceed through the
		Parish Council to finalise, in particular, housing site selection which was proving particularly difficult. Further meetings of the
		Working Group were cancelled until further notice.

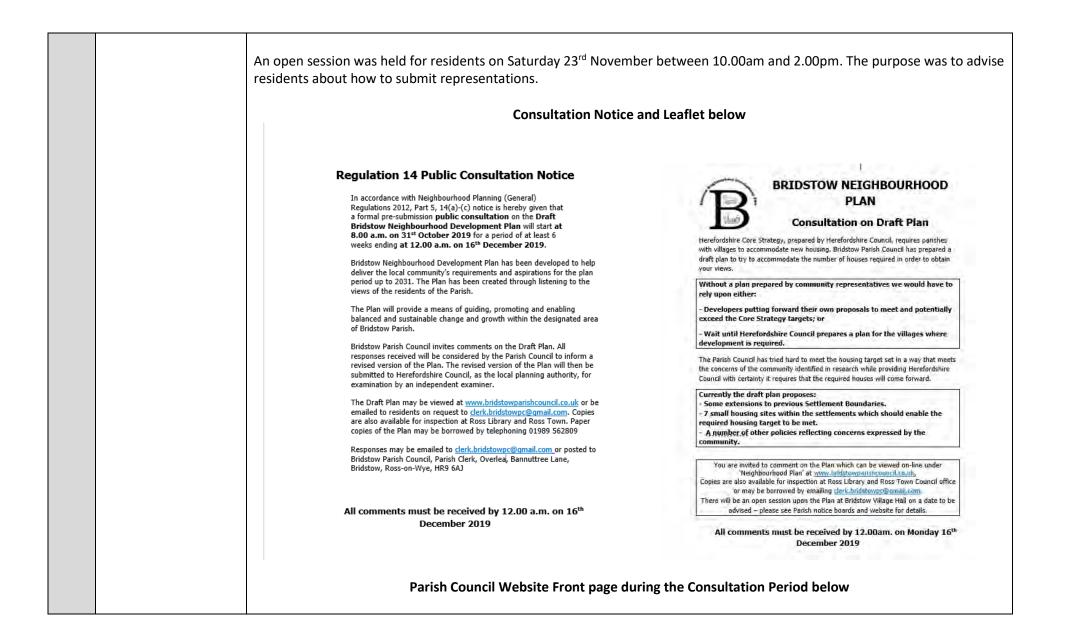
20	18 th June 2018	The Parish Council had received various correspondence from members of the public and agreed to permanently disband the
	Parish Council	Working Group (see Minutes of meeting for that date at http://www.bridstowparishcouncil.co.uk/meetings-
		<u>2018/4593484504</u>

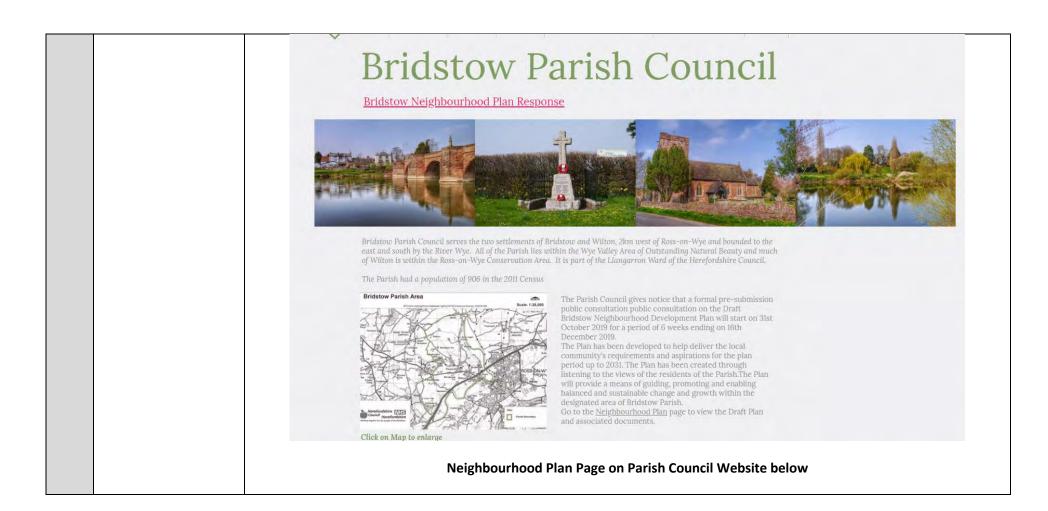
21	16 th July 2018	The Parish Council agreed to place consideration of the site assessment on hold until a planning application at
	Parish Council	Littlefields (within the vicinity of Buckcastle Hill) was determined as this might provide useful information to
		inform the assessment. (Again see the Minutes of that meeting at the above link)

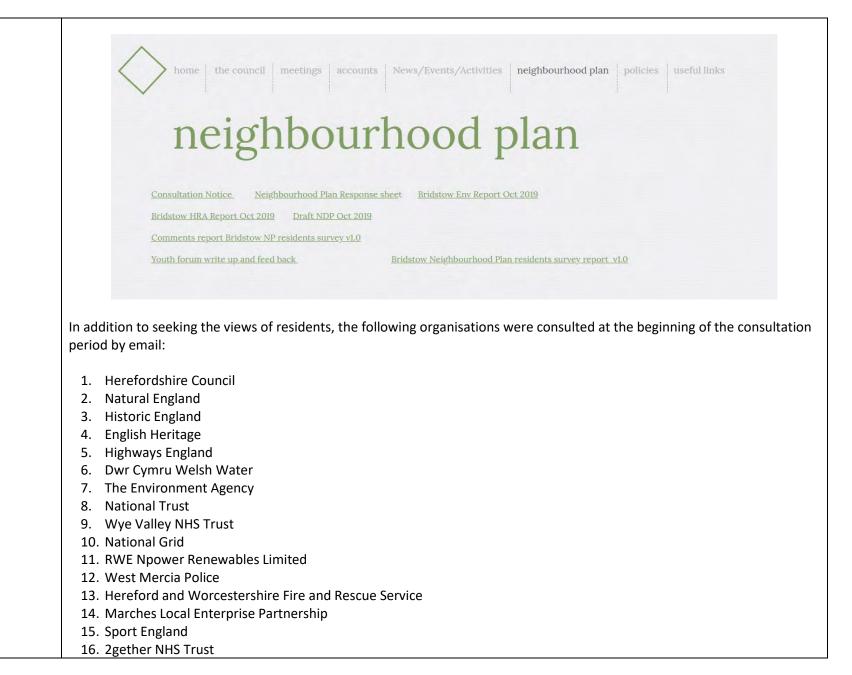
22	March to October	Parish Council commenced its consideration of the NDP at specific Parish Council NDP meetings. These meetings provided
	2019	opportunities for public participation. Agendas and minutes can be found at:
	Parish Council	http://www.bridstowparishcouncil.co.uk/neighbourhood-plan-2019/4594379561

23	3 21 st October 2019 The draft NDP was approved by the Parish Council for formal consultation under Regulation 14 of the N	
	Parish Council	Planning Regulations.

24	31 st October to 16 th	Regulation 14 consultation period opens and closes.
	December 2019	
	Parish Council	A period of just over 6 weeks public consultation was undertaken. The Public Consultation Notice was posted on all public notice boards around the Parish. A leaflet promoting the consultation was delivered to every household within the parish at
	(Regulation 14	the beginning of the consultation period.
	Consultation)	
		The Draft Plan, Public Consultation Notice, a Response Sheet, the Environmental Report and the Habitats Regulations Report together with other information were all published on the Parish Council website. During this period the Parish Council website front page concentrated upon promoting the NDP consultation with a link from the front page to the NDP section. The response sheet could be downloaded from the website for use in making representations but it was made clear that letters and emails could be used as well.
		Paper copies of the NDP, together with all other documents and the response sheets were made available at Ross Library and Ross Town Council Offices in that these were the most accessible public locations. The parish hall is not open to the public.
		Loan copies of the NDP were made available.







leaflet drop undertaken at the start of the plan consultation period.
NB 49-51: No email addresses were available for three landowners. All were residents of the Parish and included in the
36 to 48 Landowners/agents of submitted sites - Agents used in first instance where appropriate – 12 in total
35. Ross Town Council
34. Brampton Abbotts and Foy PC
33. Walford PC
32. Marstow PC
31. Peterstow PC
30. Sellack PC
29. Ross on Wye and District Civic Trust
28. Network Rail (West)
27. Great Western Trains Co. Limited
26. Arriva Trains Wales
25. Coal Authority
24. Herefordshire Housing
23. Homes and Communities Agency
22. Western Power Distribution
21. Stonewater Housing Association
20. Herefordshire Wildlife Trust
19. Woodland Trust
18. Hereford and Worcester Chamber of Commerce
17. Campaign to Protect Rural England

25	19 th October and	Parish Council considered representations and agreed changes to the NDP. Approval given to Submit NDP to Herefordshire
	16 th November 2020	Council under Regulation 15 of the Neighbourhood Planning Regulations.
	Parish Council	Representations were received from 25 members of the community along with those from 10 stakeholder organisations. These can be viewed at <u>Section 3</u> below, including the responses agreed by the Parish Council.
		A list of alterations can be found at <u>Section 4</u> below.

Section 3

Bridstow Neighbourhood Development Plan

Schedule 1

Schedule of Representations in response to Draft Neighbourhood Development Plan, November 2020

Bridstow Parish Council considered representations made upon the draft Neighbourhood Development Plan (NDP) following consultation with stakeholders undertaken at the Regulation 14 stage at its meeting on 16th November 2020. The schedule below and its appendices summarise the representations received, considers the issues they raise and, where relevant, indicates how they should be addressed in the NDP. Schedule 1 is accompanied by Schedule 2 which lists changes that have been made.

NB the policy and paragraph numbers in this document refer to those in the Regulation 14 draft NDP unless otherwise stated. Modifications proposed will result in changes to the numbering in the Submission Draft NDP.

Schedule 1: Community Representations and Response

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommends or seeks change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
C.1 R & J Blackman	Whole plan	Comment	Very pleased that the Parish Council has sought to follow the results of the Resident's Questionnaire especially concerning settlement boundaries and site sizes. The nature of Bridstow village did make this a very difficult exercise due to the small pockets of housing.	No change proposed in response to this representation
C.2 J Chapman	Policy BR16(i)	Objection	Access to site Bt2 (Policy BR16[i]) as proposed will be too close to Wye View Bungalow. The road is also very narrow. See Appendix A	See Appendix A
C.3 D Collin	Whole Plan	Comment	With the constraints imposed by the A40/A49, flood plains, conservation area and the AONB, the parish faces many difficulties in planning for development. The Parish Council and NDP working group are to be commended for producing the draft plan. Noted with thanks.	No change proposed in response to this representation
	Appendix 5, section 3 (Page 83). Policy BR11	Recommends/seeks change	Efforts should be made to widen and better maintain the pavement adjacent to the A49 from Wilton roundabout to Peterstow. This will encourage walking by residents and visitors. Unfortunately, it is not possible to include such a proposal directly through the NDP although the PC might make the suggestion to Highways England and Herefordshire Council through NDP policy BR11 and Core Strategy policy SS4 when the opportunity arises. Core Strategy policy SS4 indicates that 'Herefordshire Council will work with the Highways Agency, Network Rail, bus and train operators, developers and local communities to bring forward improvements to the local and <u>strategic transport network to</u> reduce congestion, improve air quality and road safety and offer greater transport choices'. The A49 is part of the strategic road network. Policy BR11 might refer more generally to improving the connectivity of the Public Rights of Way network within the Parish.	No change proposed to the NDP in response to this specific representation. However, a more general change is proposed – See Change No 27.
	Appendix 5, section 3 (Page 83). Policies BR11 and BR16(vi)	Recommends/seeks change	Public Right of Way BW15 should be diverted at its western end to meet the Hoarwithy Road closer to PROW BW16. This will move the western end from its currently dangerous position and better link up with the footpath network. This could be considered as part of the development at Cotterell's Farm and make a useful contribution to the Rights of Way IP. PROW 16 together with BR25 link to the Herefordshire Trail which runs to the south of Buckcastle Hill along the track that follows the Wells Brook. Currently the link between BR15 and BR16 is along a length of the Hoarwithy Road where there is no footpath. BR15 is closer to the link provided by BR25, although again the connection is along the Hoarwithy Road. There is potential for a circular route involving PROW BR15 and the Herefordshire Trail. A connection between BW15 and BW16 might be created through the proposed housing site at Cotterell's Farm, although this would only cover of proportion of the link. As such the suggested change to create the full link would have to be made outside of any planning application. Despite this, discussions upon any planning application for the proposed housing site between the landowner/developer and Herefordshire Council might provide the opportunity to commence a discussion about whether some form of link might be made. Herefordshire Council's Public Rights of Way Improvement Plan includes an action to 'Work with Planning	See Change No 46

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommends or seeks change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			Services and developers to identify section 106 agreements and other ways of improving the network'. The NDP might draw this to the attention of Herefordshire Council and the landowner through the NDP although it is understood that it cannot be a specific requirement.	
	Appendix 5, section 3 (Page 83) Policy BR11.	Recommends/seeks change	PROW5 should be diverted at its western end and be linked to PROW B23. This would remove the requirement for a footbridge as well as improve the footpath network. This would make a useful contribution to the Rights of Way IP It is not possible to include such a proposal directly through the NDP although the PC will make the suggestion to Herefordshire Council through NDP policy BR11 and Core Strategy policy SS4 when the opportunity arises. Core Strategy policy SS4 indicates that 'Herefordshire Council will work with the Highways Agency, Network Rail, bus and train operators, developers and local communities to bring forward improvements to the local and strategic <u>transport network to</u> reduce congestion, improve air quality and road safety and <u>offer greater transport choices'</u> . As previously suggested, Policy BR11 might refer more generally to improving the connectivity of the Public Rights of Way network within the Parish. The two PROWs and indicated on the map below.	See Change No 27.

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommends or seeks change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			BW 5 BW 23	
			Extract from Herefordshire Council's Public Rights of Way Map.	
C.4 D Hindocha and S Parihar	Whole Plan	Comment	No comments at the current time but would like to be kept informed of any amendments. Noted	No change proposed in response to this representation
C.5 V Piechowiak	Policy BR16(iv)(v) and (vi); Policy BR17.	Objection	Objecting to any further developments, however small, along the Hoarwithy road. There have been many 'near misses'. The cumulative effect resulting from this and other proposed developments along this road, and the pinch point at Rock Cottage, could result in significantly increased hazards. See Appendix A	See Appendix A
	Policy BR16(v); Policy BR17	Objection	Particularly object to the suggested site BK1 at Foxdale, which runs adjacent to my property. There is very poor visibility onto the Hoarwithy road along which cars frequently drive way over the speed limit. It is also used by many agricultural vehicles and pedestrians. The site at Foxdale would be visible from the A49 and therefore have an impact on the AONB. Last but not least, any houses on the Foxdale site would impact considerably on my residential amenity at Burnt House as it sits well below the ground level if the Foxdale site. I would inevitably be very overlooked no matter how 'sensitively ' any houses were positioned.	See Appendix A
	Policy BR16	Recommends/seeks change	See Appendix A It would be preferable to site any further developments at the bottom of the village, near the church and school and NOT along the Hoarwithy road. See Appendix A	See Appendix A
C.6 L Fay	Paragraph 2.5	Comment	See Appendix A "Hereford, Gloucester, Cheltenham, or even Cardiff are centres to which residents might travel for major shopping, again via car" Use of "might" indicates speculation, compared to the rest of this, and preceding paragraphs, in the "People and Community" section, which are evidence-based. Emphasis is made of the (likely) use of car transport, although some of these destinations are accessible via bus route from Bridstow.	See Change No 6

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommends or seeks change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			The possibility of access to major centres is public transport is noted.	
	Paragraph 2.6	Suggest change	"A fairly large proportion of the agricultural land is owned by the Duchy of Cornwall" Could the proportion be quantified and/or a map/plan included showing land owned by the Duchy of Cornwall. This would assist in identifying land parcels not available for potential residential development.	See Change No 7
			It is not usual to map land ownership within an NDP. To a large extent land ownership is irrelevant. The main issue in relation to residential development is whether any land proposed is suitable, available and development achievable. In reviewing this issue, it is suggested that the reference is unnecessary.	
	Paragraph 2.13	Suggest change	The land owned by the Duchy of Cornwall is described as "significant". Suggest consistency of terms across paragraphs 2.6 and 2.13 or deleting this sentence in paragraph 2.13 which is largely a repeat of text in paragraph 2.6.	No change proposed in response to this
			This is a reference to the history of the parish which assists in defining 'Place'. In the light of the change from the above comment, this reference is retained.	representation
	Paragraph 2.21	Suggest change	The paragraph identifies several constraints to development e.g. flood plain, safe guarded mineral reserves. It would be useful to show these on a constraints plan to assist in identifying land parcels un/suitable for potential residential development.	Relevant constraints to which policies
			For the purposes of the Regulation 14 document, most environmental constraints are mapped in the Strategic Environmental Assessment. The Regulation 15/16 submission plan will include a Parish Policies Map prepared by Herefordshire Council in its 'house style' that will show the flood plain and mineral safeguarding area, among other designations/policy areas. Herefordshire Council will also prepare the settlement policies maps which will also contain such information consistent with its approach.	apply will be presented on the Parish and Settlement Policies Maps for the next stage.
	Paragraph 3.19	Suggest change	 Paragraph suggests that the bus network through Bridstow is "minimal". As above, this is subjective. Buses along the A49 connecting Hereford and Ross/Gloucester run hourly which, for a relatively rural area, and in times when many local services are being reduced is, in my opinion, far more than "minimal". It is correct that this is a matter of perception and the service may be reasonable in comparison to other parts of the County. However, if alternatives to the car are to be promoted then a more frequent service would benefit this objective. This is the only comment upon the reference suggesting that the emphasis may be supported by others. 	No change proposed in response to this representation
	Paragraph 4.2.1 d)	Suggest change	Amend wording of "wildlife" to "biodiversity" to reflect importance of plants/habitats/ecosystems, not just animals. The wording can be used inter-changeably to a large extent. However, given the recent Environment Bill that refers to biodiversity net-gains, a change would reflect the approach being promoted.	See Change No 12
	Paragraph 4.2.2 b)	Suggest change	"Danger resulting from vehicles" – wording is ambiguous/unclear. Does this mean dangerous vehicles or where additional vehicles could pose a danger? It is accepted that this might be improved and a level of danger referred to.	See Change No 13
	Paragraph 4.2.2 c)	Comment	Why is this an objective of the plan if it has already been achieved? Residents supported this objective in a previous consultation and responses to the draft plan suggest that some still consider there to be a problem. However, the point made is useful and should be clarified.	See Change No 13
		Recommends/seeks change	Wording amended to "The practical measures should include, but should not be limited to":	

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommends or seeks change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
	Paragraph 4.2.3		Useful suggestion	See Change No 14
	Paragraph 6.5	Recommends/seeks change	Wording relating to Scheduled Ancient Monuments to be consistent throughout this paragraph (currently refers to Scheduled Monuments and Ancient Scheduled Monuments). Helpful Advice	See Change No 21
	Paragraph 6.5	Recommends/seeks change	Listed Buildings and locally important parks/gardens to be shown on a plan These are mapped in the Strategic Environmental Assessment. Neither are presented within Herefordshire Council's 'house style' which they utilise for the Regulation 16 stage and beyond.	No change proposed in response to this representation
	Policy BR6	Recommends/seeks change	Amend wording in final sentence of "there should be no net loss of biodiversity" to "there should be a net gain of biodiversity". Given the recent Environment Bill that refers to biodiversity net-gains, the change would reflect the new approach being promoted.	See Change No 22
	Paragraph 8.2	Recommends/seeks change	Reference to "A44" – should this be "A40"? Mistake noted and corrected	Change to A40
	Paragraph 9.7	Recommends/seeks change	Repetition of "should such proposals be advanced" Mistake noted and corrected	Delete duplication
	Site Assessment form for Bt2	Recommends/seeks change	(Land at Bridruthen). Section 4 (Impact on the Natural Environment) is incomplete, the sentence ending "although" Omission noted and corrected	The correction has been made to the assessment which is a free- standing document
C.7 N La Grue	Policy BR11 or new policy on Footpaths	Recommends/seeks change	There are inadequate policies to address the many issues noted regarding footpaths and cycle paths. In the current main policy that touches on footpaths (BR11), the measures are prefaced by "Where discussions are undertaken". This seems very weak – suppose discussions are not undertaken? Also, it must be made clear that actions should happen not necessarily in association with development proposals; when we were first informed about the NDP process, we were promised that the NDP would introduce improvements in the Parish through different means. The following NDP paragraphs identify the a key point for residents, as evidenced from the questionnaire results:	No change proposed in response to this representation
			 2.3 "Few walk to [primary] school because of safety concerns." 2.4 "There are currently no safe routes to walk to JKHS from Bridstow,". 2.18 "There is little in the way of pavements next to roads, especially in Bridstow". 3.16 "The Church has close links with the School (), but the only means of walking between the 2 buildings for the school children is along the narrow, winding lane, with no footpath." 3.20 "The safety of walkers along the A49 footpath: the footpath is very narrow, and the speed and size of traffic travelling along the road makes walking along here quite hazardous" and "The absence of safe and convenient 	

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommends or seeks change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			footways and cycle provision between the various settlements, including to the Primary School and Parish Hall, especially at Pool Mill Bridge, and leading to Ross-on-Wye". 3.20 "Around half of respondents to the residents' questionnaire indicated they would like to see the development of cycle paths within the Parish". 3.36 "Another problem that young people in the Parish experience is the lack of footpaths, and the fact that they feel the roads are unsafe for walking or cycling." 4.1 The Vision includes "There will have been work with relevant organisations and adjacent Parishes to improve facilities and amenities for local residents, such as footpaths,". There is not evident in the NDP. 4.2 Objective 3 is to ensure the network for walking and cycling is effective, but there are no policies to ensure this happens. Please add a full and clear firm policy in the NDP regarding (a) the development of new footpaths, (b) the maintenance of existing footpaths, and (c) the development of cycle paths. The Parish Council recognises that the community would like to see more footpaths and also cycleways, and acknowledges this would have benefits for health, pedestrian safety and addressing climate change through reducing the need for car journeys. However, the provision of footpaths and cycle paths not associated with new development falls to Highways England or Herefordshire Council (as the case might be) as Highway Authority. The Parish Council is unable to directly promote measures associated with the highway, including through identifying them in the NDP that have not received their confirmation, but must rely upon working with those two organisations. Herefordshire Local Plan Core Strategy policy SS4 (paragraph 4) indicates Herefordshire Council will work with communities and others, including Highways England, to offer greater transport choices. This is advocated through NDP policy BR11 and improvements to cycling and walking links are included within this and emphasised in paragraph 7.2.	
	New policy on facilities for Young People	Recommends/seeks change	In relation to paragraphs 3.34 through 3.40, there are no policies to address the comments raised by young people in the Youth Forum, in particular the main wish to have a park or similar area of open space for play. This is critical. Please add a clear policy to address the points raised in the Youth Form, ideally, independent of development proposals. Paragraph 10.2 acknowledges that facilities are needed for young people within the Parish and the Youth Forum has identified areas of need which include a play area. The NDP does not identify a specific site and associated proposal for a play area. In order to do this a landowner willing to make land available in a suitable location needs to be identified and funding needs to be set aside to purchase the land and set the area out for play. Consequently, a flexible approach is required to progress a proposal when both these elements are in place. Policy BR21 enables the development of community facilities to be brought forward and Policy BR23 (NB wrongly numbered as a second BR22) enables contributions to be obtained from developers towards the funding where this is possible. Other funding sources will, however, be needed, either through grants or Parish precept according to priorities determined by the Parish Council. The need for a play area as a high priority might however, be emphasised. The Forum also identified the need for shop/café and youth club. These might utilise existing buildings such as the village hall. Again, the two policies referred to might be used where this involves development.	See Change No 51
C.8 M and H Capps	Whole plan	Comment	Have no comments on the plan but would like to thank everyone involved for all the hard work from the beginning of this plan. Noted	No change proposed in

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommends or seeks change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
				response to this representation
C.9 V Davies	Whole plan	Comment	No observations except to thank the Parish Council for all of the work that has gone into preparing the plan. Noted	No change proposed in response to this representation
C.10 A Priddis	Paragraph 3.4 and Objective 6	Recommends/seeks change	Consultation across the parish identified trying to create more of a 'centre' to Bridstow near the School, Church and Hall but the Plan seems to make no attempt to do so. The majority of the Bridstow development that is recommended in the plan is, in fact, at the point furthest from the School, Church and Hall, not on the sites nearest. See Appendix A	See Appendix A
	Paragraph 3.20 bullet point 2	Recommends/seeks change	There is no provision to make parking for the School easier for parents and carers taking and collecting children. The Parish Council recognises the need to address the problems associated with parking at the primary school. However, in the absence of development proposals that might assist in providing a solution, the matter falls to be addressed either by Herefordshire Council as Local Education Authority or School Governors and neither have indicated they have the resources and wish for the matter to be addressed through the NDP. The Parish Council would need their confirmation on both these points. Should they wish to address this matter during the plan period, NDP policies BR11 and BR21 would assist in the enhancement of facilities supporting the enhancement of the school as a named local community facility, including car parking. The former specifically highlights this is a matter to be addressed.	No change proposed in response to this representation
	Paragraph 3.29	Recommends/seeks change	The Parish Consultation which took place recognised, among other things, the need for more affordable housing which is not provided for in the current Neighbourhood Plan. See Appendix A	See Appendix A
	Policy BR16(v)	Objection	6.11(c) says, "Ensuring that new developments do not adversely affect the amenity, privacy or aspects of adjacent properties" is a vital principle. This must be right, yet it would call into question the proposal for the Foxdale development which, it is acknowledged, would adversely affect Burnt House's privacy, not least because the ground for the development is higher than Burnt Cottage itself as well as being very close. See Appendix A	See Appendix A
	Policy BR16(vi)	Objection	 5.2(b) says, "Traffic generated by new development should avoid adversely affecting the amenity and safety of residents." I agree of course and am grateful for this being said explicitly, and it is a good reason not to add to the traffic on the Hoarwithy Road. The Highways and Transportation section (3.20) makes no reference to the fact that the Hoarwithy Road, just below its junction with the A49, is too narrow for even two cars to pass, let alone tractors and lorries and the bus. Furthermore, there is of course (as noted) no footpath there and it is a blind bend which is already dangerous and hazardous and will become even more so with the addition of extra traffic from more houses. The proposal for 8 new houses (Bk4b), outside the present settlement boundary, would mean that cars were coming out onto the Hoarwithy Road where there is no speed limit and the visibility at the Moraston House end of the proposed development especially would be very restricted and dangerous. There are development plans for Sellack, Hoarwithy and Little Dewchurch which will all add to the Hoarwithy Road traffic problems. 	See Appendix A

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	Policy BR16(vi)	Objection	 5.2(a) says "The highest priority will be given to protecting the landscape of the Wye Valley AONB" and 5.2(c) says, "Housing outside of the settlement boundaries identified above should be exceptional", yet despite this, two of the proposals are outside the settlement boundary and your own quoted advice and recommendation for Bk4b even says that it "would still be extremely visible along the ridge line". The conclusion relating to this proposed development (page 99) says, "The reduced site (Bk4b) has greater potential but would still conflict with the landscape requirements of the AONB, including by leading to further development elongating development along the frontage." And the same conclusion also says, "Such an extent of 	See Appendix A
			suburban design of ribbon development would be contrary to the settlement's character and its extent might set a precedent for further development on the opposite side of the road." See Appendix A	
	Policies BR16 (iv), (v) and (vi)	Objection	The Ross-on-Wye assessment in connection with their plan identified an over provision already of 4 bedroom houses in this area. I would ask that the proposals for Foxdale, Oaklands, and Cotterell's Farm be removed from the plan.	See Appendix A
	Policy BR16 and paragraph 8.25	Recommends/seeks change	See Appendix A Furthermore, I would ask that the shortfall of 16 houses that would result is met by the Ross-on-Wye offer of allocating 15 houses out of its own excess, and the Bridstow projected windfalls of 12, which together give a possible 27 houses not explicitly included in the Development Plan but which could be, and, to my mind, should be included so that fewer other new houses are needed in Bridstow and Wilton.	See Appendix A
C.11 K Priddis	Policies BR15, BR16 iv), v) & vi), and BR17	Objection	See Appendix A I do understand the need for more housing in our area but I would always object to any planning application for that section of Bridstow on the Hoarwithy Rd from Moraston House to where it joins the A49 for the reasons outlined below:	See Appendix A
			The proposed developments are outside the settlement boundary. I draw your attention to Policy BR2 : Development Strategy, paragraph c) <i>Housing development outside of the settlement boundaries identified above should be exceptional and (only if they) can be accommodated on the road network.</i>	
			This leads me to my main concern, which is about the potential increased density of traffic. I draw your attention to Policy BR1: Promoting Sustainable Development, paragraph b . <i>Traffic generated by new development should</i> avoid adversely affecting the amenity and safety of residents. Measures should be introduced, including where possible in association with the development of sites, to minimise the effects of vehicles on the local road network and the effect of heavy goods traffic upon residential amenity, to improve pedestrian and cyclist safety, and to promote sustainable transport initiatives.	
			 I have three comments on this. The traffic habitually exceeds the 30mph speed limit on the two steep hills between the A49 and that section of the Hoarwithy Rd where you propose to build more houses. Cars are parked both sides of this road, making the road even narrower. Vehicles regularly using the Hoarwithy Rd include heavy farm-vehicles and lorries, 	

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			delivery trucks and cars from villages this side of Hereford. Add to these any from the new developments in Sellack, Hoarwithy and Little Dewchurch and this section of road becomes even more dangerous.	
			2. As you are aware, except for the bus stop by Cosy Lane there is no pavement, neither on Wellsbrook Lane nor from the Claytons, nor anywhere on the Hoarwithy Rd between the proposed developments and the A49 making the lane already hazardous, especially to pedestrians. Nor is there space to construct any, making it impossible for parents with pushchairs and children of primary school age from any new development to walk to the school or shop without putting themselves at risk. It would be an accident waiting to happen. Driving to Bridstow Primary School would merely exacerbate the school's already inadequate parking problems.	
			3. I therefore draw your attention to Policy BR9: Sustainable Design paragraph c) With regard to housing development the new homes are fully integrated into the existing neighbourhood and support a more pedestrian-friendly environment through convenient links to local facilities and public transport connections which are suitable for those pushing pushchairs, in wheelchairs, walking with aids or using mobility scooters.	
			Please, therefore, do nothing that will increase the level of traffic and make an already difficult situation worse.	-
			See Appendix A	
	Paragraph 3.29	Comment/Recommends/seeks change	The parish consultation showed a desire for more affordable homes but the plan does not provide any and it would be good to know why.	See Appendix A
6.42			See Appendix A	
C.12 I and J Corlett	Policy BR16 iv)	Objection	We are residents of one of the houses affected by the designation of a site south of the house called Oaklands, which gives its name to the proposed development of 5 houses within the NDP. Object on 3 grounds:	See Appendix A
			 Planning Process – a) Choice of sites 	
			It has been reported that members of the group charged with the formulation of a draft NDP could not agree where developments should be situated. We understand that the parish council had to resort to the use of the independent consultant who wrote the current report. Certainly, as we understand it, the process slowed to a stop until a professional was involved to formulate the response that currently exists. There is a strong suspicion that NIMBY'ism characterised many of the meetings. There was initially a call for sites for development in 2017. These were then evaluated, and some rejected. It is difficult to understand the processes that have occurred and there appears to have been no clear attempt at the outset to identify any appropriate parameters for constructing a plan. Certainly, calling for sites seems a haphazard way of achieving a coherent plan. There is little evidence of a rigorous analysis of the area, in terms of housing need against the specific parameters adopted by the parish council and, hence, the working party. There is no clear analysis of why sites were rejected or accepted. That seems to us to be important given that all of the sites identified are problematic in one way or another. Potential sites outlined on pages 108 and 115 (B13 and B16) were offered by the Duchy of Cornwall, and were then withdrawn by the Duchy, apparently because of opposition by various members of the committee tasked to offer an impartial view. In our view these sites would offer the best solutions to traffic problems associated with the Hoarwithy Road. We would ask that the sites be further considered and discussed with the Duchy. Their proximity to Ross and the local school	

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			makes these sites eminently suitable for affordable housing.	
			b) Type of housing - In a survey:	
			3.29 Residents support the need for more market housing (81%) and also low-cost homes for sale (54%). Slightly more people felt there is a need for shared ownership than those against. However, there is generally equal support and opposition for further rented accommodation, either through housing associations or private renting. Where affordable housing is provided, the majority felt these should be for people who live, have lived, or work within the Parish. The greatest need is considered to be for family homes (69%), adapted/easy access homes (60%) and starter homes (57%).	
			There is little to suggest that there has been any focus on the need for affordable housing, or that it has taken into account local views as above. Given that planning applications approved recently in the area have been for large, executive style detached houses, as for example the Littlefields site, it seems likely that any development on the Oaklands site would be similar, to attract developers rather than meet actual local housing need. If the land at Oaklands is to be built on, we would wish to see a planning proviso that mandates that some or all of them must be affordable housing.	
			2. Highways and transportation - The draft NDP notes:	
			2.18 There are public footpaths that criss-cross the fields of the Parish, although, with the exception of along the A49 trunk road, there is little in the way of pavements next to roads, especially in Bridstow. The way-marked Herefordshire Trail follows paths and lanes leading from Ross to Peterstow and Sellack, and there is a short way-marked circular Parish path. One path at Wilton will be added to the Definitive Map due to the outcome of a public inquiry, and there are a number of ancient routes that could be investigated. There is important and valid comment about the isolated nature of Bridstow with particular focus on the school and the church.	
			The draft Plan also comments on decisions made:	
			4.4 The following criteria and weightings were those approved by the Parish Council to be used in the assessment: 1. Impact on Highway Safety (35%) 2. Development of the Footpath / Cycle Network (5%) 3. Impact on the Immediate Environment and Amenity of Residents (30%),	
			and it goes on to detail	
			3.20 The amount of traffic travelling along the Hoarwithy Road coupled with increased on-street parking at Buckcastle Hill. The absence of safe and convenient footways and cycle provision between the various settlements, including to the Primary School and Parish Hall, especially at Pool Mill Bridge, and leading to Ross-on-Wye.	
			As the consultant noted, many cars do not stay within the speed limit and, at times, walking on the Hoarwithy Road at Buckcastle Hill is dangerous. That danger is compounded by an increasing level of on road car parking. Older	

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			residents, with decreased mobility have commented that the road without a footpath or pavement, or street lighting is dangerous. It is difficult to live in the area without two cars, one family car leaving other members of the family isolated at home. The bus service is very poor and not available for work or school journeys. As pedestrians who walk our dog daily along the road in Buckcastle Hill, and as car drivers having to to negotiate pedestrians on the road, it seems to us that everyone, especially young people, is at real danger from the numbers of cars speeding along Hoarwithy Road. In particular it is risky to pedestrians and drivers alike on the "pinch point", the narrow section of the road before it joins the A49. There is also a significant amount of large farm vehicles and horse transports. Other Parish Councils north of Bridstow such as Sellack are/will be agreeing strategies to increase their housing stock with further planning approvals, and the consequent increase in traffic will impact on Bridstow and the Hoarwithy Road the most.	
			The draft Plan states: 4.2, 8.22 This site comprises a paddock area defined by a private drive along its southern and eastern edges. This already serves two dwellings. The access onto the Hoarwithy Road is not sufficient for more than a limited number of dwellings, while the character of the area is low density. The following requirements have been set for this site to meet the policies set out in this plan: • The amenity of adjacent dwelling to the west of the site should be protected; • The site should be developed at a low density.	
			We believe that a further development at Oaklands which will, given the likely nature of the properties, lead to a further 10-20 more vehicles, all regularly using a small access point onto an already busy road would simply create further difficulties.	
			3. Environment - The draft report states:	
			17 e) Tree and hedgerow-cover should be retained, including through the use of Tree Preservation Orders in relation to trees, and a detailed landscape scheme prepared and implemented to ensure development conserves the landscape of the AONB	
			There are a number of large mature trees in the proposed site which provide roosting and nesting places, plus shelter, for numerous birds. These should be preserved. See Appendix A	-
C.13 A and C Wheatley	Whole Plan	Comment	The plan does a reasonable job of spreading the load across the parish. However, there are significant infrastructure concerns for all of it, particularly sewerage and highways. Hopefully, Welsh Water are addressing the sewerage issues, but we cannot add more dwellings without the ability to deal with the waste. The roads serving the current dwellings are not up to the job as it is. Please do not underestimate the amount of traffic on the Hoarwithy Road. It is a through road and the way that traffic currently uses it is unacceptable and needs more control. It will also be affected by developments in other villages which need to be taken into account in our plan. Looking at the A40, the works there have had minimal effect, the reduced speed limit is mostly ignored and there doesn't appear to be any enforcement. Likewise, the 50 and 40 limits on the A49. We need a lot of commitment from Highways England and Herefordshire to improve the roads.	No change proposed in response to the representation in relation to the advice of Welsh Water.

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			Welsh Water (reference S.2 below) has supported the plan's policies and particularly policy BR8. It indicates there are no specific issues in terms of waste wate and water supply to sites shown in policies BR14 and BR16 although some level of offsite mains/sewers may be required in certain instances in order to connect to the existing networks.	See Appendix A in relation to highway issues.
			The trunk road network (A40 and A49) is managed by Highways England, who have been consulted upon the NDP. Similarly, Herefordshire Council, responsible for the local highway network has been consulted on the NDP. Their advice will be used in determining revisions following this consultation - see Appendix A.	
	Para 3.17	Comment	It should be noted that the C1261 Hoarwithy Road running through the Buckcastle Hill settlement brings through traffic from the neighbouring villages of Sellack and Hoarwithy. Increased development in these villages will increase the amount of traffic using this already busy section of road. See Appendix A	See Appendix A
	Para 3.20	Comment	Not enough is made of the amount, and type, of traffic using the C1261 Hoarwithy Road and the pinch point at Rock Cottage which is hazardous to both pedestrians and traffic. Fully agree with all the comments about the A40 & A49 and the danger they represent. See Appendix A	See Appendix A
	Para 3.21	Comment	A lot of work is required on the road network in the village to make the proposed development sites viable and safe for all. See Appendix A	See Appendix A
	Para 3.23	Comment	Much more work needs to be done to make access to the A49 and A40 trunk roads safer for local traffic particularly in light of increased traffic. See Appendix A	See Appendix A
	Policy BR9	Comment	Hope that external lighting will not be part of any development as this will adversely affect the rural character of the village. It should only be allowed as an absolute last resort. The installation of lighting is not normally a matter requiring planning permission but in so far as it might be policies BR9 and BR12 are relevant	No change proposed in response to this representation
	Policy BR11	Recommends/seeks change	Please add something in this policy about controlling the speed and volume of traffic along the C1261 Hoarwithy Road The control the speed of vehicles and volume of traffic is a matter falling to Herefordshire Council as Highway Authority and generally falls outside of the NDP. However, Policy BR11 seeks to address the concerns of residents in this regard in a form set by Core strategy policy SS4 which has been improved by a Planning Inspector.	No change proposed in response to the representation
	Para 8.2	Recommends/seeks change	Should read A40 not A44 Many thanks for highlighting this error which has been corrected.	See Change No 33
	Appendix 5 to Main Appendix 2, para 6.6	Recommends/seeks change	No mention of the types of traffic using the Hoarwithy road. Large quantities of large agricultural vehicles; Heavy Goods Vehicles and cars use this road. A large amount of the traffic ignores the posted 30mph limit. Confusing signage of speed limit close to A49 junction doesn't help. Paragraph 6.6 is a broad statement relating to how settlement boundaries might be defined and does not look at	No change proposed in response to the representation
			the range of constraints and opportunities that should be considered in allocating land for housing development.	-1

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			It explains why a variation to the advice issued by Herefordshire Council (Guidance Note 20) might be used in a particular part of Buckcastle Hill.	
	Appendix 6 to Main Appendix 2, S Site Bk1	Comment	Very hazardous access onto the road. Residents of Burnt House will be adversely affected by poor development on this site See Appendix A	See Appendix A
	Appendix 6 to Main Appendix 2, Site Bk2	Comment	Highway access is not the best but slightly better than Bk1. Would be a narrow road to the development. Neighbours would be overlooked, and their privacy affected unless the plot is planned very sensitively. See Appendix A	See Appendix A
	Appendix 6 to Main Appendix 2, Site Bk4	Comment	Will need the 30mph limit moving out past the development to help road safety. Will affect the privacy of neighbours unless planned sensitively. Need to keep the development small in number and well spread out. See Appendix A	See Appendix A
	Appendix 6 to Main Appendix 2, Site Bk6	Comment	Agree with the comments and this one could have minimal impact on the surrounds, maybe even improve it. Noted	No change proposed in response to the representation
	Appendix 6 to Main Appendix 2, Site Bk7	Comment	Agree with the comments about adverse effects on road safety Noted	No change proposed in response to the representation
	Appendix 6 to Main Appendix 2, Site Bt2	Comment	Again, road safety is the biggest issue due to the width of Bannuttree Lane and the A49 junction, both of which really need major work. The effect on neighbouring properties need to be mitigated. See Appendix A	See Appendix A
	Appendix 6 to Main Appendix 2, Site Bt3	Comment	This would appear to be a prime candidate for development and an opportunity to improve Bannuttree Lane and the access to the A49 at the same time. It would be quite visible, but then so are the developments on the outskirts of Ross. Yes, there would be some effect on the houses that look over towards Ross, but houses could be built below the sight lines. However, road safety is still a big issue. See Appendix A	See Appendix A
	Appendix 6 to Main Appendix 2, Site Bt4	Comment	Highways issues again and safety of the school children. But potentially one of the better sites with minimal effect on neighbours. See Appendix A	See Appendix A
	Appendix 6 to Main Appendix 2, Site Bt6	Comment	Highway safety difficult and can only see access to Cosy Lane being the best way. But this adds more traffic to the Hoarwithy Road. Would it be better to close the south end of Cosy Lane and make the access through this development? See Appendix A	See Appendix A
	SAC DIO	Comment	Would appear to be sensible use of this land	

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	Appendix 6 to Main Appendix 2, S Site Bt7		Noted	No change proposed in response to this representation
	Appendix 6 to Main Appendix 2, Site C1	Comment	Only develop here if the access roads are all improved as they cannot be expected to take the traffic. Otherwise it would be a good location. This site is not proposed as a housing site. It has recently been refused planning permission, including on appeal.	No change proposed in response to this representation
	Appendix 6 to Main Appendix 2, Site W1	Comment	High visual impact and not a great place to site more housing. Highways issues greater than many other sites.This site is not proposed as a housing site. It has recently been refused planning permission. Appeal decision pending.	No change proposed in response to this representation
	Appendix 6 to Main Appendix 2, Site W2	Comment	Would tidy up an area of Wilton that it visibly poor. Some increased Highways risk but not as great as in some of the other plots See Appendix A	See Appendix A
C.14 C Reid	Whole Plan	Support	Considers the draft proposals represent a sensible way forward for the village Noted	No change proposed in response to this representation
C.15 N Pollock on behalf of the Duchy of Cornwall	Policy BR16(iii)	Support	The Duchy of Cornwall has been in discussion with the Parish over a number of years and has been invited to consider various options for growth on the Estate. The Parish has presented its proposals in the Draft NDP. We welcome the allocation of land for housing at Whitecross. We have (no?) further comments to make on the Draft Plan at this point.	No change proposed in response to the representation
C.16 E and M Price	Policy BR1(b) and para 3.23	Comment	Highways England have provided advice that additional traffic movements at the junction of Wilton Lane with the A40 are acceptable with the agreed improvements to the adjacent footpath. See Appendix A	See Appendix A
	Policy BR2(a) and para 5.4	Recommends/seeks change	The boundary as defined fails to provide sufficient scope for development in Wilton or allow for improvements to the appearance of the adjacent Conservation area which is identified as being in a poor state. See Appendix A	See Appendix A
	Policy BR3 and para 6.1	Comment	No account has been taken in the site selection process of the effects of cumulative development in each of the individual identified Parish settlement areas. See Appendix A	See Appendix A
	Para 6.8	Comment	Flooding does not extend to the site adjacent Wilton Lane to the north west of the settlement as demonstrated in the available drainage reports. The paragraph does not refer to any specific site.	No change proposed in response to this representation

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	Policy BR13 and paras 8.3 and 8.4	Recommends/seeks change	Basing the new boundary for Wilton on an interim boundary from many years ago while excluding the land adjacent Wilton Lane in Zone1 not subject to flooding and then seeking to make up the shortfall elsewhere, is not in line with the need to plan positively for development. See Appendix A	See Appendix A
	Para 4.17	Comment	Comments regarding the AONB are subject to the ongoing appeal and are at odds with the professional advice contained in the Landscape Visual Impact Assessment appropriately provided. See Appendix A	See Appendix A
	Appendix 5 to Main Appendix 2, para 1.2	Recommends/seeks change	The SHLAA 2015 contains numerous errors in relation to the site adjacent Wilton Lane and is therefore not a fit document for planning purposes. The formal Highways response to the recent application and appeal shows no objection to 9 houses at this site. One of the few sites that generates footway improvements and allows scope for a new public footpath. The comments relating to amenity don't take into account detailed building design. Noise levels are lower than the other site in Wilton. There is a buffer zone to the A40 and significant tree planting is possible, so air quality is not a concern. See Appendix A	See Appendix A
	Appendix 6 to Main Appendix 2, Site W1	Recommends/seeks change	Much of the scoring of the site adjacent to Wilton Lane in respect of the reduced area and the issues raised above has been conducted in a manner that does not properly represent the location and needs to be re-examined. More appropriate lower levels would have an obvious impact on the site ranking. See Appendix A	See Appendix A
	Appendix 9 to Main Appendix 2	Comment	Deliberately setting out to not meet the housing land target would void the understanding made with Ross Town Council. See Appendix A	See Appendix A
C.17 F Cook M Tunnicliff J Chapman	Policy BR16(i) and (iii)	Objection	At the last consultation meeting with the public last year, the only development stated was the proposal to build nine bungalows on the land associated with Bridruthen. This involved the demolition of the old house and the building of nine new properties, the only access being a single entrance opposite Rose Cottage We now understand that a strip of land running from the A49 down the south side of Bannuttree Lane has been offered for development for a further five properties by The Duchy. The original proposal for this area was a much larger development of 20 plus properties with a new access onto the A49. With these proposals there are no improvements planned for Bannuttree Lane. Bannuttree Lane is an uneven single-track lane with no footpath it is littered with potholes and unlit. Most occupants of properties have a minimum of two cars and increasing the building to 13, as they will all have to use Bannuttree lane, is totally unreasonable. The only road widening that has taken place down the lane, occurred when the above three bungalows were built. This wider road area is now frequently used as a layby for car parking by existing residents. There is also a marked increase in delivery vehicles using the lane as internet shopping increases. Our other concern is that if planning is granted on this land there is no guarantee that the developer will limit the number of properties as the area of Bridruthen could take more than 9 properties though the roads and access cannot and the new area could be similarly extended adding to the problem. Additionally, the least intrusive property would be single-storey bungalows and these would be in keeping with the area, but can that be guaranteed once planning is granted. See Appendix A	See Appendix A
	Policy BR16(i)	Objection	The existing field entrance shown in the site assessment is immediately opposite Spring Bank and the width of Bannuttree Lane at this point from Wye View is only 5 meters. It would therefore be impossible for any large	See Appendix A

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			vehicle to turn left out of the site. The property Wye View is built within 4 ft of the boundary hedge and an access road would have a deleterious effect on its' quiet country aspect and result in alterations having to be made to the property itself i.e. the repositioning of the oil tank.	
			When these properties were built the lane had to be widened to 5.5 meters and a footpath 1.8 meters wide was also included. To enable lorries to access the north part of Bannuttree Lane there is only a very small piece of raised Kerb on the footpath (where the cars are parked) enabling vehicles to use the footpath as well as the road to complete the turning (used every week by the amenities lorry). To enable similar access to be achieved, it would require an extensive part of the Bidruthen curtilage to be used. Photos show the widened area of the road used as a layby and the fact that vehicles turning up Bannuttree Lane have actually reversed onto the front lawn of the Paddocks. A hedge has now been planted. The impact on residents is almost classed as minimal. To the residents who actually border the site the affect will be significant. Our properties face the widest area of Bannuttree Lane. This is used extensively during the summer months as additional parking and not just by residents. In the evening, being unlit, cars may be parked here while properties are burgled. There has been one opportunistic burglary in this area and one intruder, who had his car parked in this area, disturbed before he could gain entry. The introduction of a road at the rear of our properties will only increase the risk.	
			We understand that the owner of the land between this field and the A40 would also be willing to sell for building as long as he had access to Bannuttree Lane. This would obviously increase the vehicles and pedestrians using the lane to a completely unreasonable level.	
			See Appendix A	
	The blocking of the central reservation on the A40 and the Toucan Crossing.	Comment and seeks change	Residents walking to Bennetts Garage for the paper etc. used to safely cross the A40 opposite Wilton Lane, visibility is good, and you have a safe central reservation and then cross the second lane to walk safely to the garage. There is at least one resident who daily still uses this route preferring to climb over the central barrier rather than use the longer and more dangerous road crossing of the A49 because of the poor visibility and you have to judge traffic from 2 directions at the same time. It is also a dangerous junction for vehicles particularly when turning right out of Bannuttree Lane. The introduction of a fixed speed Camera in this area would be very helpful. The introduction of the 40mph speed limit on the A40 has not slowed the traffic down at the Bannuttree Lane exit because it is only 40 yards west of it. The only time traffic slows is if there is a build-up of traffic at the roundabout. Both exits from Bannuttree Lane are difficult and will become more hazardous with increasing traffic volumes on both trunk roads or from the lane itself. The crossing of the A40 by pedestrians adjacent to Wilton Lane is not to be encouraged. Highways England has recently provided a pelican crossing on the east side of Wilton roundabout to improve pedestrian safety. Should further measures be required to address the effects of development on the A40 then these might be pursued	No change proposed in response to the first part of this representation. See Appendix A for other highway issues.
			with Highways England by the Parish Council and Herefordshire Council through NDP policy BR11 and Core Strategy policy SS4 respectively. In relation to the junctions of Bannuttree Lane with the A40 and A49, see Appendix A	

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C.18 D and S Colman	Para 2.21	Recommends/seeks change	This paragraph says "No areas of derelict land have been identified or areas of land suitable for regeneration" but according to the Herefordshire call for land HLAA/449/001, the "Land east of the A49" is brownfield land and is available for development. (https://www.herefordshire.gov.uk/downloads/id/2557/bridstow.pdf) There are already houses in this area, so why is it not promoted for small-scale development, given Herefordshire council's stated aim for brownfield development wherever possible. (in appendix 1, page 75) Although some farm buildings sit within the site, the majority of the area referred to under HLAA/449/001 comprises 2 large fields and the reference to it being brownfield must be an error. The site was not submitted through either of the two NDP 'Call for Sites'. Herefordshire SHLAA indicated there were significant highway constraints and also adverse effects on the landscape of the AONB.	No change proposed in response to the representation
	Para 3.11	Recommends/seeks change	There is a statement the "it is important that the settings of the parish's settlements and important landscape and heritage features are conserved or enhanced where appropriate from all directions along the major highways, other roads and footpaths through the Parish". Why is this important, and who decided it is more important than other deciding factors? This seems to be scene-setting for later, where being visible from the road is more significant than having development crammed almost into residents' back gardens. This is a conclusion drawn for the resident's questionnaire and subsequent community consultation advanced as an issue to be addressed through the NDP. It has also been informed by higher order planning policies in the NPPF and Core strategy. Views need to be from locations available to the public and these are most likely to be	No change proposed in response to this representation

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			from roads and footpaths, including public rights of way. There are other matters that have been identified as important and the approach to determining relative importance was discussed at length by the NDP Working Group, set out in the Housing Land Assessment paper that forms part of the evidence base, and agreed by the Parish Council.	
	Para 3.12	Comment	 "61% of respondents indicated they would like the NDP to include settlement boundaries for settlements". The plan seems to lean on this factor pretty substantially, so it is important to know what people actually voted for. How was the question actually posed? Did the respondents clearly understand that it would mean restriction of the potential for development to their immediate vicinity? It is, in effect, a change in policy from the traditional developments along the roads, particularly on Buckcastle Hill. Settlement boundaries have been used commonly in local authority development plans for many years and Buckcastle Hill has previously had one defined for it as part of Bridstow. There is no reason to believe rependents do not understand the commont. 	No change proposed in response to the representation
	Para 3.13	Comment	respondents do not understand the concept. There is no change in policy in that regard.There is a mention of the visual gap between Wilton and Bridstow. Why should there be a need or requirement for a visual gap? There are two concentrated settlements in the area of Wilton and Bannuttree Lane, why not join up the two settlements? The fields between are not particularly notable or typical. As paragraph 3.15 alludes to, there is already a connection at the southern corner of the Bannuttree Lane development.The maintenance of the current gap is an objective set by the NDP Working Group following public consultation and an approach accepted by the Parish Council. It is one of a number of objectives promoted within the plan. No other representations suggest that the objective is one that should be reconsidered.	No change proposed in response to the representation
	Para 3.15	Recommends/seeks change	"Accessibility is a constraint, and this includes poor junctions onto both the A49 and A40". There is an opportunity to improve the junction onto the A49 and reduce the likelihood of accidents by moving the junction toward the roundabout, as described later in the plan, BT3c, but this seems to have been dismissed due to local objection, and the possibility of highways agency objection, but as can be seen by the developments on the north of Ross, changes to major roads such as the A40 are possible. The benefits of such a scheme were considered but outweighed by the uncertainty that it might be acceptable to the Highways England, given the comments by Herefordshire Council's Highways section, and other factors.	No change proposed in response to the representation
	Para 3.32	Comment	"The need to protect good quality agricultural land is recognised as important". Only a small piece of land is particularly good quality according to section 2.21. None of the proposed developments would use up much land, compared with the amount available in the Bridstow area. Agreed which supports the approach adopted.	No change proposed in response to the representation
	Para 3.36	Recommends/seeks change	"young people in the Parish experience is the lack of footpaths, and the fact that they feel the roads are unsafe for walking or cycling". No allowance seems to have been made for this, in the proposed development. School children currently walk past the Rock cottage pinch points, and the proposed most favoured developments are likely to add more traffic and children into this risky area. This is recognised as an important issue but the absence of footpaths and cycleways applies across much of the Parish, as it does elsewhere within the rural parts of the County. The pinch point at Rock Cottage is acknowledged but the level and type of housing development within the Buckcastle Hill area is anticipated is	No change proposed in response to the representation
	Para 3.42	Comment	small in relative terms. "Residents were strongly opposed to this approach and no suitable and available options were considered to provide sufficient public benefits to outweigh objections to 'major development' that would result, as required by	No change proposed in

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommends or seeks change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			NPPF paragraph 172". Which residents objected? Would it be ones next to the proposed developments, even though the proposed ones were similar to the existing ones? See Resident's survey March 2016.	response to the representation
	Para 3.43	Comment	"Spreading housing provision across the settlements areas in scale with their character and size offers a fair distribution between them and places less pressure upon the local environment, allowing better integration of new residents into the respective communities." Buckcastle hill seems to have been targeted specifically even though the proposed developments don't match the existing wayside cottage style of the Buckcastle hill area. This was the preferred approach and has been adopted so far as it has been possible given the availability of deliverable sites. The constraints, in particular in relation to the effect on the trunk roads, were such that it was not possible to achieve this to the extent as was initially wished.	No change proposed in response to the representation
	Para 3.44	Recommends/seeks change	"no suitable site for this became available at the end of the site search process". For Bridstow, the land behind the school and close to the school would seem to be a suitable site. Although initially submitted by the landowner, it was withdrawn so is not available for development.	No change proposed in response to the representation
	Para 4.2(c)	Comment	 "Preserving the landscape and natural settings of the settlements that comprise Bridstow, in particular by maintaining the landscape that separates them from Ross-on-Wye and Wilton". How did the separation become a core requirement? The southern end of Bannuttree Lane already touches Wilton. The maintenance of the current gap is an objective set by the NDP Working Group following public consultation and an approach accepted by the Parish Council. It is one of a number of objectives promoted within the plan. Although development at Bannuttree Lane is connected to Wilton at one point, this is through a small number of cottages and away from the most important area of separation closer to Wilton Castle and the Old Vicarage. No other representations suggest that the objective is one that should be reconsidered. 	No change proposed in response to the representation
	Policy BR4(d)	Comment/ Recommends/seeks change	 "Ensure that proposals do not visually diminish the openness of the Strategic Green Gap between Bridstow and Wilton" Where did the concept of a "Strategic Green Gap" come from? Establishing this requirement seems to be goal of an author. "alien urban appearance" No-one is proposing an alien urban landscape, just a few houses on otherwise unattractive fields on both sides of the A49, and an improvement to the road junction. The maintenance of the current gap is an objective set by the NDP Working Group following public consultation and an approach accepted by the Parish Council. It is one of a number of objectives promoted within the plan and the reason for it is encompassed within the policy. No other representations suggest that the objective is one that should be reconsidered. 	No change proposed in response to the representation
	Para 8.3	Comment	"Wilton Castle, an important Scheduled Ancient Monument that contributes significantly to views of the Wye valley AONB from Ross-on-Wye". Wilton castle is a private property, and no particular concession should be made to it. It might be seen from the prospect, but no development is likely to interrupt that view, because of the flood plain. It is national policy to protect the settings of Scheduled Ancient Monuments and ownership is irrelevant in that regard. The Castle's setting is not just from one viewpoint and the approach should take into account guidance from Historic England. Similarly, it is Government policy to protect the landscape of the Wye Valley AONB.	No change proposed in response to the representation
	Para 8.12	Comment	"extensions to encompass three housing allocations" - Why have development boundaries been changed to accommodate three housing allocations. What is the point in the boundaries if they are changed to accommodate the allocations? "Specific provision is made to ensure its character is retained". The character of Buckcastle hill is wayside cottages. The proposed developments are not of this type.	No change proposed in response to the representation

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			There is currently no development boundary as these were superseded by the Core Strategy (and also the previous Herefordshire Unitary Development Plan in some instances). Development boundaries are subject to review from time to time in order to accommodate new development, with the approach being guided, in this instance, by the housing strategy and policies within Herefordshire Local Plan Core Strategy. Core Strategy policy RA2 and its subsequent paragraph 4.8.23. should the Parish Council not produce a NDP with settlement/development boundaries, then this task is likely to be undertaken by Herefordshire Council through its Rural Areas Sites Allocation Development Plan Document. Some changes to the character of settlements may result as a consequence, but the character analysis seeks to minimise this where possible. It has not proved possible to accommodate the required level of proportional housing growth without such an effect.	
	Para 8.22	Comment	"Measures may be required to protect land further to the east on the opposite side of the existing track from development" who decides whether these measures are required? These will be determined by the local planning authority, in particular in order to protect the landscape of the AONB. The Parish Council would draw the LPA's attention to this at the time of any planning application.	No change proposed in response to the representation
	Main Appendix 2 - Para 6.6	Comment	"For Buckcastle Hill, a broader definition might be considered based upon the above but, in addition, incorporating its south-facing slopes where a specific policy requirement should seek to retain its loose-knit character while allowing limited windfall development that might contribute towards meeting the proportional housing growth requirement through promote opportunities for self-build dwellings". Why is Buckcastle hill considered a special case? Is this to enable the plan to avoid the limits imposed on other areas. The reason for and approach to defining the Area of Special Character at Buckcastle Hill is set out within Policy BR17 and the subsequent paragraphs 8.24 and 8.25. It enables the area to accommodate some development, such as at Salsden Cottage and adjacent to Oaklands (included in policy BR16), and in other locations within it that would contribute towards the required level of proportional growth while seeking to retain its particular character. It might also contribute sites that could be used for self-build. However, at the time of preparing the NDP, no other sites within the defined area were suggested and consequently with the exception of the site at Oaklands, an estimate of development is included within a windfall allowance for development within settlement boundaries (see paragraph 3.26)	No change proposed in response to the representation
	Main Appendix 2, sub Appendix 6 Site BK6 - Conclusion	Comment	"primary issue is whether it would fall within a settlement boundary to be defined without resulting in significant further development within the AONB." Why should 1 or 2 houses, at an out-of-the-way site at Salsdon necessarily result in significant further development elsewhere? There was a concern by the independent planning consultant that an extensive boundary (in accordance with Core Strategy policy RA2) that included Salsden Cottage would result in a significant amount of development that would adversely affect the settlement's setting within the AONB, similar to that at The Claytons, and not the development of 1 or 2 dwellings. However, the policy approach proposed through BR17 seeks to retain the low- density character which predominates. It is understood that the NDP cannot propose development outside of settlement boundaries which would thereby be considered development in the open countryside. Any such proposals would fall to be considered under Core Strategy policy RA3. NDP paragraph 3.26 provides an allowance for such developments.	No change proposed in response to the representation
	Housing distribution between settlements	Comment	The Plan does not reflect the original requirement for a 64/36 split between Bridstow and Wilton. When work upon the NDP commenced, housing targets were set specifically for the settlements of Bridstow and Wilton. However, this approach was changed by a Government Planning Inspector and parish targets were set to	No change proposed in response to the representation

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			be distributed through NDPs in accordance with Core Strategy Policy RA2. There is no specific split for the distribution between settlements within the parish, even if it was possible.	
	Statement of Interests	Comment	There should be a statement of interest by the authors. This does not have to list the names, maybe just the area and the particular interest. The Parish Council must comply with legal requirements in relation to declaration of interests and where this is	No change proposed in response to the
			relevant, they will be recorded in the minutes of its meetings	representation
C.19 G and D	Whole Plan	Support	The plan is a pragmatic response to the objectives described and strikes a reasonable balance of the options available and avoids any large-scale developments	No change proposed in
Bullock			Noted.	response to the representation
C.20 G Barrett	Non-Housing Policies	Comment	Whilst the Plan presents policies for a much wider of issues (than housing), these are likely to have little, if any, practical effect. There is no significant market demand for any other forms of development. No significant funding is likely to be available to deliver aspirations for improvements in areas such as road safety and community facilities given the pressures on public expenditure. Equally, there is no serious likelihood of substantial developments which could provide S106 contributions – not least because the local key institutional landowner (the Duchy) is likely to be concerned about the reputational implications of the well organised public resistance that any such proposals would inevitably encounter.	See Appendix B
	Approach to Housing	Recommends/seeks change	The Plan has to be viewed primarily as a vehicle to influence housing development. The potential form and location of such development is clearly the dominant concern of Parishioners, apparently mostly because of worries about how this could impact on their own residential environments. It needs to be noted that the combination of restrictive planning policies and the objections of residents to virtually any new housing have meant that almost no houses have been constructed in the Parish over the last 25 years. The central question to be considered going forward is whether the draft NDP represents a realistic basis for meeting the Parish housing target over period to 2031, or whether it is, in effect, largely a means of 'kicking the issue into the long grass' for a further decade. It is far from clear that a number of the owners of the proposed sites have any serious intention of bringing them forward for development within the Plan period and there are good reasons for doubting whether they are likely to do so. It should be noted that – with the exception of the Foxdale site - there are no indications that any of the owners of the proposed sites have taken any practical steps to progress the developments involved since their original discussions with the consultant took place. In this context, it may be relevant that in two cases these discussions were initiated by the former Working Group rather than by the owners. This all raises questions of whether – or when – the owners have any real intention of bringing schemes forward, or whether they were merely happy to agree to the inclusion of their sites because it creates potential future options which may increase the value of their land holdings in the interim? As a minimum, the intentions of the site owners need to be properly tested before the sites can be judged to be realistically developable within the Plan period. MHCLG guidance (Should every site be assessed for viability?) makes the point that "more detailed assessment may be necessary for particular ar	See Appendix A

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommends or seeks change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
	Policy BR14	Recommends/seeks change	The Parish Council was advised at the meeting with Herefordshire Council planning and transport officers on 24/5/2017, inter alia, that two of the proposed development sites within the draft Plan raise potential transport concerns and that one potentially raises significant environmental health issues. The comments on the transport issues were elaborated in subsequent correspondence by the Area Engineer. The draft Plan largely ignores this advice (Section 2). The approved minutes of the 2017 meeting highlight the following potential site constraints: In relation to the housing site in Wilton: – At the meeting Jill {the Area Engineer} had concerns over access to the roundabout and environmental health issues from heavy traffic". In subsequent correspondence the need for consultation with Highways England was also noted. Subsequent to this meeting: – Concerns about the health risks of air pollution have, of course, become a significant national issue. The site is severely impacted by air (and likely too ground) pollution and noise associated in particular with 24/7 braking and pulling away by heavy goods vehicles on the approach to the roundabout along the A40. – A planning application (P183187) for Land at Wilton Lane 200 yards or so along the A40 south of the roundabout was turned down, with the officer report arguing that the development "would result in dwellings where satisfactory levels of amenity cannot be achieved" and that "the site is not suitable for residential development due to the noise risks posed". – The site was on the market for an extended period relatively recently. – Policy BR14 imposes a series of conditions which would need to be met before it could be developed which would significantly impact on the costs of any scheme. Aside from the questions above about whether housing is even a potentially suitable use for the site, it is clear that the location would have a significant adverse impact on the price which could be realised for any residential pro	See Appendix A
	Policy BR16(i)	Recommends/seeks change	The Parish Council was advised at the meeting with Herefordshire Council planning and transport officers on 24/5/2017, inter alia, that the proposed development site within the draft Plan raise potential transport concerns and that one potentially raises significant environmental health issues. The comments on the transport issues were elaborated in subsequent correspondence by the Area Engineer. The draft Plan largely ignores this advice (Section 2). The approved minutes of the 2017 meeting highlight the following potential site constraints: – "At the meeting Jill {the Area Engineer} stated that it would be unlikely that to be acceptable by (sic) Herefordshire Council on highways grounds/existing Bannuttree Lane junction". In subsequent correspondence the Area Engineer drew attention to the need for consultation with Highways England, the narrowness of the Lane and the problems in achieving sight lines which meet HC guidance requirements. – Aside from the issues noted in Section 2 above, the potential development depends upon the demolition of the existing dwelling. Work has recently been done on the house from scaffolding and there is a local understanding that the current occupier has a lifetime right of occupation There are potential questions about whether the development of two of the proposed sites is likely to be financially viable given the 'abnormal' costs involved and the modest end values which are likely to be potentially achievable (Section 4). See Appendix A	See Appendix A

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommends or seeks change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
	Policy BR16(ii)	Recommends/seeks change	Old Vicarage – subsequent to the original discussions the property has been placed on the market. The sale particulars (on the Rightmove website) specifically contrast the property with other former rectories/vicarages, noting that "many {such residences have been} subsequently spoilt by development taking place within their former grounds"!	See Appendix A
	Policy BR16(iii)	Recommends/seeks change	See Appendix A It should be noted that the Whitecross site – which also raises both access and environmental health issues - was 'not on the table' at the time of the meeting with Herefordshire Council Highways section. The three identified potential development plots are all exceptionally narrow and any houses would be no more than a very few yards from the 24/7 noise and fumes of the A49 carriageway, raising major questions about the attractiveness of any housing to the market, even if potential policy constraints on the development could be overcome. Viability of two is potentially problematic.	See Appendix A
	Policy BR16 (iv)	Recommends/seeks change	See Appendix A The owner of the site has elderly relatives living nearby who would be potentially impacted both by the potential developments involved and, no doubt too, by the inevitable hostile reactions of other neighbours to any firm development proposals. See Appendix A	See Appendix A
	Policy BR16(vi)	Recommends/seeks change	The site was not discussed with HC Highways at any meeting which raises significant planning policy issues. The owner of the site has elderly relatives living nearby who would be potentially impacted both by the potential developments involved and, no doubt too, by the inevitable hostile reactions of other neighbours to any firm development proposals.	See Appendix A
	Strategic Environmental Assessment	Recommends/seeks change	See Appendix A There are also questions about whether the Strategic Environmental Assessment (SEA) which accompanies the draft Plan represents realistic advice to local residents on the potential environmental impacts of the development of the sites proposed. This is now the third version of the SEA and there are clearly major doubts about whether its conclusion that the proposed developments would have neutral or positive environmental impacts – for which no supporting justification is provided – is reasonable given that all but two of the proposed sites involve 'greenfield' development within the AONB.	No change proposed in response to the representation
			The SEA has been prepared by Herefordshire Council using a format and approach consistent with all other NDPs that it has assisted and found to meet the requirements of NDP examiners. The approach is considered a 'proportionate' one consistent with the Sustainability Appraisal undertaken for Herefordshire Local Plan Core Strategy that was approved by a Planning Inspector.	
	Parish Council processes	Request for information	Formally request that the report on the outcome of the consultation records my concerns that the Parish Councillors who were elected in May were denied any opportunity to discuss the draft prior to the initiation of the Regulation 14 consultation. The concern is noted in this schedule. Minutes of Parish Council Neighbourhood Plan Meetings where decisions were made can be found at: http://www.bridstowparishcouncil.co.uk/neighbourhood-plan/4594379561.	No change proposed in response to the representation
	Parish Council processes	Request for information	Formally request an 'audit trail' of the processes is provided as an annex to the report which provides: details and minutes of public and private meetings of the Parish Council to discuss the emerging draft; similar details of the meetings held between members of the Parish Council and the consultant (Bill Bloxsome), and copies of the correspondence with the consultant subsequent to the disbandment of the former Working Group.	No change proposed in response to the representation

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			All reports and minutes of meetings upon the Neighbourhood Plan by the Parish Council can be found at http://www.bridstowparishcouncil.co.uk/neighbourhood-plan/4594379561. The Working Group was disbanded in June 2018. Available Steering Group and Working Notes are being put onto the Parish Council together with those from meetings of the Parish Council on the Neighbourhood Plan. Regular reports from Parish Councillor representatives on the Working Group were made to the Parish Council. Meetings to instruct the Planning Consultant on matters to set out in the NDP either followed decisions by the Parish Council or were reported subsequently to the Parish Council at its meetings. They culminated in the approval of the NDP for consultation under Regulation 14 by the Parish Council at its meeting on 15 th April 2019. Subsequently advice was received from the consultant upon the process for carrying out the Regulation 14 consultation. A Consultation Statement will have to be prepared for submission with the revised draft Plan at the next formal stage.	
C.21 P Brown	Approach to housing/non- housing; Policies BR14 and BR16		I would like to express my support for the comments made by George Barrett regarding the Bridstow NDP regulation 14 consultation Draft. See responses to the representations under C.20 above.	See responses to C.20 above
	Parish Council process	Request for information	I share his concerns about some aspects of the associated processes which were followed to get to the Regulation 14 consultation and that the newly elected Councillors were not given the opportunity to discuss the draft prior to the initiation of the Reg 14 consultation. See responses to the representations under C.20 above.	See responses to C.20 above
C.22 J Wilde	Paras 3.5 and 3.6; Policy BR1	Comment	Bridstow falls within an AONB and I quote "means that considerable weight is to be given to conserving and enhancing its landscape an area that should have the highest status of protection". How is this important statement implemented by the Parish Council in all its planning application decisions? I refer to the recent letter of approval for P193865/F. Can they honestly believe that the developers will show a 'sensitive approach'? The Parish Council considered the effects of this particular proposal on the Wye Valley AONB and its conclusion is a matter of record.	No change proposed in response to the representation
	Policy BR1b)	Comment	I agree with the statement but how can it be achieved with proposed developments up the Hoarwithy Road. It is stated that 20% of residents in the Parish live at Claytons/Pool Mill; 20% of Parish residents live along the Hoarwithy Road. If 24 – 40 extra houses is approved this will increase to over 50% of the Parish living in this area. All these residents have to access it from the A49 and travel through the pinch point above Pool Mill and travel along the hazardous road, causing more danger to pedestrians, cyclists and residents. Accidents waiting to happen. See Appendix A	See Appendix A
	Paras 2.3 and 2.4; Policy BR11	Recommends/seeks change	The community expressed grave concerns about the danger to children at the school. There are no significant policies to address this, except policy BR11. How are these measures going to be funded and where is the extra land coming from? With the current financial cut-backs, locally and at County level, this would be unachievable. The Parish Council recognises the need to address the problems associated with parking at the primary school. However, in the absence of development proposals that might assist in providing a solution, the matter falls to be addressed either by Herefordshire Council as Local Education Authority or School Governors and neither have indicated they have the resources and wish for the matter to be addressed through the NDP. Should they wish to address this matter during the plan period, NDP policies BR11 and BR21 would assist in the enhancement of facilities supporting the enhancement of the school as a named local community facility, including car parking.	No change proposed in response to the representation

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			The former specifically highlights this is a matter to be addressed. The Parish Council will continue to press for a satisfactory solution through policy BR11.	
	Policy BR11c) and f)	Comment	Traffic measures – many of these are unrealistically unachievable. c) parking adjacent to Bridstow School; f) safety problems at junctions onto major routes - unless land is available.Herefordshire Local Plan Core Strategy policy SS4 indicates that it will work with Highways England and local communities, among others, to bring forward improvements to the local and strategic transport network. Those issues set out in Policy BR11 have been identified through the various consultations with the local community. Those referred to in the representation will require land but this need not necessarily be in association with other development proposals.It is noted that there is an error in the numbering within the policy and Examinations of similar policies in other	See Change No 27
			NDPs provide greater clarity of what measures might be included in such a policy. Amendments to the policy have been made as a consequence.	
	Policy BR12	Recommends/seeks change	On street parking – how is this going to be enforced and funded? It is already a problem in the Parish and especially along the Hoarwithy Road i.e. the part of the road known locally as 'The Duck'. Cars are parked regularly outside and along access points to proposed developments, i.e. Foxdale, Oaklands, and outside Greengates (adjacent to Littlefields).	No change proposed in response to the representation
			This policy is to direct how new developments take into account a number of highways and transport issues, including the need to avoid leading to further on street parking. It may not always be possible to address existing on-street parking and the policy acknowledges this by reference to 'where possible'. Where such parking would restrict the ability to develop an otherwise suitable site, then measures to address this might enable the development to proceed. This could be highlighted in relation to the sites referred to at the time of any planning application so that the Highway Authority might considered whether on-street parking creates such a problem.	
	Policy BR15 and Bridstow (Buckcastle Hill) Policies Map Development boundary	Recommends/seeks change	In view of Appendix 2, Sub Appendix 3 page 77 and para 6.6, there is a disproportionate scale of development along the Hoarwithy Road compared with other parts of the Parish. The settlement boundary should not extend beyond The Nook and it should be reassessed. See Appendix A	See Appendix A
	Policies BR14 and BR16	Recommends/seeks change	Site BR16 iv) (Appendix 2 para 4.5 – Oaklands) Agree to small, restricted development Site BR16 iii) (Appendix 2 para 4.6 - Whitecross) Agree Site BR16 ii) (Appendix 2 para 4.7 – Old Vicarage) Agree Site BR14 (Appendix 2 para 4.8 – Wilton Cottages) Agree with restrictions Site BR16 v) (Appendix 2 para 4.9 - Foxdale) Access a major concern and refused by Highway Authority. Burnt House will be seriously affected and overlooked. Site BR16 vi) (Appendix 2 para 4.10 – Cotterell's farm) Extending village unnecessarily, causing a big impact to rural countryside within the existing AONB and out of character with the area. Land adjacent to Tanglewood (Appendix 2 para 4.14) This site should be studied again as suggested in para 4.2 of the Appendix. The whole site need not be fully developed, and restrictive clauses applied. A better access should seriously be considered.	See Appendix A

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommends or seeks change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			See Appendix A	
	Site Assessment for Site Bk4,	Recommends/seeks change	Incorrect to say not known in relation to planning history. Planning application SH/890212/PF in 1989 by a previous owner of the field was refused planning permission on highway and AONB issues. See Appendix A	See Appendix A
	Page 96			
	Approach to Housing	Comment	Community preference for sites mapped at the Community Consultation in (Open day for NDP) in 2016 showed an overwhelming feeling where development should and should not take place. It is important that these opinions be taken more seriously and that there is a strong desire that development should take place in 'the core' of the village near to where the main facilities are.	See Appendix A
			See Appendix A	1
ŀ	Consultation Arrangements	Comment	Many feel in the Community that since the Parish Council took over the NDP there has been very restricted opportunity for the public to ask questions/discuss/debate some of the decisions that have been taken putting the	No change proposed in

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommends or seeks change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			policy together. I was dismayed and disappointed by the 'Open Session' in the village hall. There was only a narrow window of opportunity for people to attend of only 4 hours. There were no visual displays and nobody to answer with authority on the draft policy. I had several questions that could not be answered. Visitors were waiting to view 3 copies in a cold, unheated hall. A warm refreshment would have been welcoming. It lacked community spirit. The Working Group had undertaken considerable work in seeking to produce the NDP and provided opportunities for the public to air their views at each of its monthly meetings for a number of years. The public's expression of views had been many and varied. The Parish Council agreed it was time to move to the first formal stage of public consultation and publish the draft Plan under the Neighbourhood Plan Regulations (Regulation 14) so that there would then be a structured approach to try to address the competing issues. There will be a further formal stage when representations can be made undertaken by Herefordshire Council. The open session at the village hall was to answer basic questions and those attending were urged to address matters to which answers could not be given within formal representations. The Plan had been published and made available prior to the open session.	response to the representation
C.23 I Meredith	Policy BR15 and Bridstow (Buckcastle Hill) Policies Map and BR16 (vi)	Objection	This is a small hamlet with no facilities, dangerous road, within the AONB and excessive development at the furthest point from the core of the Parish will ruin the rural countryside which I have known since 1951 as a resident at The Cotterells. I definitely disagree with the extended boundary beyond 'The Nook'. Hoarwithy Road is dangerous and is used as a rat run from Hereford, Hoarwithy and Little Dewchurch. The road surface is poor, potholes and very narrow in places. The area is not suitable for extra vehicles if development takes place. I put in a planning application in 1989 for one bungalow past The Nook on land that I owned. It was refused on the grounds of extending ribbon development and the AONB. These reasons are still pertinent and valid today.	See Appendix A

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommends or seeks change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			TELEPHONE: HEREFORD (0422) 248171 BROKENHATON BERGEND BALL BERGEN DE NEL 1844 TOWE AND COUNTRY FLAMING ACT 1971 (Fore FRE- RETURAL OF PLANING PERMISSION TO ME & TWREDTIN THE COTTORNELL BETOSTUM TO ME & TWREDTIN THE COTTORNELL BETOSTUM TO SER UNITS APPLICATION HOL SHEROZIZEF BETOSTUM THE COTTORNELL BETOSTUM THE SCHEMENTON THE APPLICATION AND SHERO UNIT THE SCHEMENTON THE APPLICATION AND PROVIDE AND THE BETOSTUM THE APPLICATION AND AND PROVIDE AND THE BETOSTUM THE AND THE APPLICATION AND AND PROVIDE AND THE BETOSTUM THE AND THE APPLICATION AND AND AND AND AND AND AND AND AND AN	
	Housing policy	Recommends/seeks change	There is no provision for affordable/starter homes See Appendix A	See Appendix A
C.24 N Edwards	Policy BR11 e); Para 4.2, Objectives 2c and 3a and b	Recommends/seeks change	 See Appendix A The footpath from Bridstow village hall junction to the Wilton Roundabout is far too narrow. In daylight, walking with the traffic coming from behind feels horribly vulnerable to loose or projecting loads. In the dark it is quite frightening. The crossing from Bannuttree Lane to the school side of the A49 only has dropped kerbs. The gap is very wide for slow walkers and children. Any chance of lights or a refuge. Although closing the central barrier on the A40 where it is opposite the lower end of Bannuttree Lane was the right thing given the dangerous turns by HGVs some of us still use this route to cross the A40 as it feels safer than crossing the A49 referred to above. Please keep the footpaths clear of vegetation from Bannuttree Lane past Bannuttree Cottages (along A40) and on the other side of the A40 towards the garage and shop. Often this route is 	No change proposed to the NDP in response to these specific representations. However, a more general change is proposed – See Change No 27.

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommends or seeks change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			Thank you for your hard work and for the pedestrian and cyclist lights. Unfortunately, it is not possible to include proposals directly through the NDP to address these issues although the PC will make the suggestion to Highways England and Herefordshire Council through NDP policy BR11 and Core Strategy policy SS4 when the opportunity arises. Core Strategy policy SS4 indicates that 'Herefordshire Council will work with the Highways Agency, Network Rail, bus and train operators, developers and local communities to bring forward improvements to the local and strategic transport network to reduce congestion, improve air quality and road safety and offer greater transport choices'. The A49 is part of the strategic road network. Policy BR11 might refer more generally to improving the connectivity of the Public Rights of Way network within the Parish. The NDP cannot address maintenance of the footpath but this is an issue that can be raised with the appropriate highway authority when the opportunity arises.	
C.25 W Wilde	Para 2.21	Recommends/seeks change	It is widely appreciated by planners that modern housing developments produce considerably increased water run- off from roofs, concrete and tarmacked surfaces. The whole of the Buckcastle Hill area and Hoarwithy Road drains into the Wells Brook. What thought has been given to the capability of the brook to handle such an increase? The building most at risk of flooding is St Bridget's Church. Proposals will be required to address this issue wherever there is the potential to cause storm water flooding of other properties in accordance with policy BR7.	No change proposed in response to this representation
	Policy BR1a)	Support and comment	Strongly support this policy in its entirety. These plans pay little attention to this policy/directive. I would go so far as to say that the policy is being largely disregarded by the Parish Council. Support noted. The policy has not been disregarded but as with all decisions, both in terms of developing the NDP and for any planning applications, it is weighed against all other relevant criteria. In accordance with national policy it should be given significant weight.	No change proposed in response to this representation
	Paragraph 7.1	Recommends/seeks change	Until the problem of the C1261 Hoarwithy Road between Pool Mill and the A49 trunk road is addressed, surely the Highways authority must object to any further housing development along this road and also to developments at Sellack and Hoarwithy. The incredibly dangerous 'pinch point' cannot take any more traffic. See Appendix A	See Appendix A
	Policy BR15, Bridstow (Buckcastle Hill) Policies Map	Recommends/seeks change	The two fields west of Moor Court farm are clearly very suitable sites for development yet they have been excluded from the area designated the settlement boundary – why? The reason for their exclusion from the settlement boundary is set out in paragraph 8.12. In addition, it was explicitly stated by the owner's representative at a Working Group meeting that the land was not available for development.	No change proposed in response to this representation
	Policy BR16 ii), para 8.19	Support	Strongly support a sensible development at this site between the Glebe and The Old Rectory. It is adjacent to the 'core' of the village and is eminently suitable. Noted	No change proposed in response to this representation
	Policy BR16 vi) Bridstow (Buckcastle Hill) Policies Map	Objection	It is vital that the public can see consistency in planning decisions. The proposal to extend the settlement boundary to include agricultural pastureland to the north of The Nook up the Hoarwithy Road must be challenged. Planning permission was refused on appeal by the Planning Inspectorate for a housing development in the paddock immediately opposite on the other side of the road at the Woodlands and this is a recent decision. The NDP flies in the face of that decision.	See Appendix A

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommends or seeks change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			See Appendix A	
	Bridstow (Bannuttree) Policies Map; Appendix 2 siteBT6, para 4.14, Land at Tanglewood	Recommends/seeks change	Insufficient attention has been paid to an obvious contender for a housing development site – the field surrounding Tanglewood. This field is currently owned by the Diocese of Hereford Cathedral I believe. Safe access is achievable at many points round its perimeter, even off the A49. See Appendix A	See Appendix A
	Policy BR17, Bridstow (Buckcastle Hill) Policies Map	Comment and Recommends/seeks change	The area designated 'Area of Special Character' is a totally new concept to me. The whole area is designated 'Outstanding Natural Beauty' anyway and surely this should be sufficient in itself. Under whose authority can sites be deemed of special character? This smacks of Nimbyism. There are two hillside sites ideal for development here either side of the lane above and beyond Cavendish Cottage. See Appendix A	See Appendix A

Schedule 2: Stakeholder Representations and Response

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
S.1 Herefordshire Council (Statutory Consultee)	Whole Plan	Comment	The majority of the NDP policies appear to be in line with the NPPF and Herefordshire Core Strategy. The plan is well structured, written, and evidenced. The policies and objectives have been informed by community consultations and have incorporated the views of the local community. The plan has a positive approach towards identifying settlement boundaries and allocating housing sites to demonstrate how the parish can meet the proportionate growth target.	No change proposed in response to this representation
,	Whole Plan		Environmental Health (Air/Water/Wate) Developments such as hospitals, homes and schools may be considered 'sensitive' and as such consideration should be given to risk from contamination notwithstanding any comments. Please note that the above does not constitute a detailed investigation or desk study to consider risk from contamination. Should any information about the former uses of the proposed development areas be available I would recommend they be submitted for consideration as they may change the comments provided. It should be recognised that contamination is a material planning consideration and is referred to within the NPPF. I would recommend applicants and those involved in the parish plan refer to the pertinent parts of the NPPF and be familiar with the requirements and meanings given when considering risk from contamination during development. Finally, it is also worth bearing in mind that the NPPF makes clear that the developer and/or landowner is responsible for securing safe development where a site is affected by contamination. These comments are provided on the basis that any other developments would be subject to application through the normal planning process. This consideration is covered by policy BR9(a).	No change proposed in response to this representation
	Para 2.19		There is now a cycle lane leading to and from the toucan crossing over the A40 north eastern arm of Wilton Roundabout. However, it is difficult for cyclists leaving Ross-on-Wye to access the crossing from Wilton Bridge. This is noted and provides useful support for policy BR11	See Change No 29
	Para 3.19		There is an hourly bus service to Ross-on-Wye and Gloucester going southbound and an hourly service to Hereford Northbound. This could not be described as minimal. This is a matter of perception and the service may be more than minimal in comparison to other parts of the County. However, if alternatives to the car are to be promoted then a more frequent service would benefit this objective. This is the only comment upon the reference suggesting that the emphasis may be supported by others.	No change proposed in response to this representation
	Para 3.20		A feasibility study in 2008 investigated a possible re decking of Backney Bridge to provide a walking and cycling route to Ross Rugby Club. This remains a long-term aspiration, should funding allow, to ultimately form part of National Cycle Network route 44 between Hereford and Ross-on-Wye, and provide an alternative walking and cycling route between the parish and Ross-on-Wye. This is noted and provides useful support for policy BR11. However, it is understood that the location of part of the bridge is just inside the Parish on its extreme northern eastern edge.	See Change No 29
	Objective 2a)	Comment	Relocation of speed limit terminals and changes to the legal Traffic Regulation Order maybe required. Noted. It is understood that where necessary such orders will be pursued through provisions under the Highways Act	No change proposed in response to this representation
	Objective 2b)	Comment	Any works on the highway will be required to go through a technical audit and may also require a Road Safety Audit.	

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			Noted. It would be expected that Herefordshire Council, in providing advice as Local Highway Authority upon any planning application would either undertake such audits or seek information from an applicant to enable this.	No change proposed in response to this representation
	Objective 3b)	Comment	Must meet Herefordshire Council highways design guide. Noted although the majority of principal footpath routes through the parish are along the Trunk Roads. The objective seeks to reflect Herefordshire Council's promotion of cycling as an alternative to the use of the car.	No change proposed in response to this representation
	Objective 3 (new)		Add in new point c) - c) protect the line of former railway against development to support the development of active travel (walking and cycling) routes It is understood that only a very small part of the route is just inside the Parish on its extreme northern eastern edge although it does include part of Backney Bridge. The inclusion of such an objective is considered to be in accordance with principles expressed by the community when it was consulted upon objectives for the NDP. However, it is not considered appropriate for the NDP to protect the line through a specific policy in view of the financial implications that this might impose upon the Parish unless Herefordshire Council will guarantee to fund any purchase order. However, this provides useful support for policy BR11 which encourages better provision for walking and cycling.	See Changes No 14 and 27
	Objective 4	Recommends/ seeks change	Environmental Health and Trading Standards Service recommend additional new criterion under this objective: 'e) Ensuring that the acoustic environment is taken into account in the design and layout of the houses and site. The sentiment is supported although an alternative approach is advocated to cover this so that design is looked at more comprehensively.	See Change No 15
	BR1		In general conformity with Herefordshire Local Plan Core Strategy. Clarify what 'advanced' means. B-Cycle Storage should be provided within each dwelling. It should be secure covered and individual. Businesses should also provide cycle storage, changing rooms and lockers to promote cycling. Conformity noted. In view of the comment, a change is proposed that should address the need for clarity. In relation to cycle storage, this is a detailed matter covered for housing through policy BR9(a). In order to support Herefordshire Council's promotion of active travel, seeking wider provision of facilities for cyclists as a consequence of this representation is accepted through an addition to policy BR12	See Changes Nos 30
	BR2		In general conformity with Herefordshire Local Plan Core Strategy. The settlement boundaries and site allocations within this policy will help the parish meet housing target of 57, residual target of 39. Noted	No change proposed in response to this representation
	BR3		In general conformity with Herefordshire Local Plan Core Strategy. Too restrictive, instead of 'will be refused'replace with, 'will not be supported'. Conformity noted. The term 'will be refused' is the same as that used in NPPF paragraph 172 so far as it relates to landscape and scenic beauty and there is no reason to lessen the protection set nationally.	No change proposed in response to this representation
	BR4		In general conformity with Herefordshire Local Plan Core Strategy. Section f - Is this for all proposals or just for large- scale proposals? Conformity noted. It is accepted that this needs to be clarified to indicate it covers all proposals.	See Change No 18
	BR5		In general conformity with Herefordshire Local Plan Core Strategy. Noted	No change proposed in response to this representation
	BR6		In general conformity with Herefordshire Local Plan Core Strategy.	

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			Noted	No change proposed in response to this representation
	BR7		In general conformity with Herefordshire Local Plan Core Strategy. Noted	No change proposed in response to this representation
	BR8		In general conformity with Herefordshire Local Plan Core Strategy. Noted	No change proposed in response to this representation
	BR9		In general conformity with Herefordshire Local Plan Core Strategy. d - replace sustainable travel with Active travel. g- Construction management plan should be provided as part of any significant development or will have implications on the highway. Conformity noted. The suggested change to criterion d is accepted. It is considered that the need for a construction management plan might more appropriately be referred to in the supporting statement to the policy rather than the policy itself.	See Changes Nos 24 and 25
	BR10		In general conformity with Herefordshire Local Plan Core Strategy. Criterion c) - Environmental Health and Trading Standards Service recommend a subsequent sentence to the sentence 'Ensuring that new developments do not adversely affect the amenity, privacy or aspects of adjacent properties' Ensuring that the amenity of future residents is not adversely impacted by commercial or industrial activity. The objective being to protect future residents. Conformity Noted. The suggested additional provision is accepted as a relevant material consideration that should be included in the policy	See Change No 26
	BR11		In general conformity with Herefordshire Local Plan Core Strategy. Please note that the NDP cannot put in place Traffic Regulation Orders. Not implementable as a statutory policy and could be moved into in a supportive/ explanatory section of the NDP on policy BR12. Part d of policy unlikely to be implementable as a planning policy. A statutory policy in a neighbourhood plan can only deal with matters which involve the development and use of land. As stated in Planning Practice Guidance:- Wider community aspirations than those relating to the development and use of land, if set out as part of the plan, would need to be clearly identifiable. Policies in a neighbourhood plan are implemented through decision-making on planning applications, by the local planning authority. Many decisions relating to transport matters are taken by the Local Highways Authority either under the Highways Acts or as permitted development under the provisions of Class A in Part 9 of Schedule 2 to the Town and Country Planning (General Permitted Development) Order 2015. Conformity Noted. It is understood that the representation refers to provision 'a) Measures to reduce the speed of vehicles on entry to villages.' Its removal from the planning policy is reluctantly accepted on the basis that this is a general term and actions would fall under the Highways Acts rather than planning provisions. However, it is noted that Core Strategy Policy SS4 is couched in very similar terms, referring to working with local communities, among	See Change No 27
			others, to improve road safety. That policy has been approved by a Planning Inspector. It has also been supported by Highways England and measures suggested by Herefordshire Council officers that relate to this policy. The Local Transport Plan Strategy and Policy documents indicates that HC will work with local communities to design and	

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			deliver local improvements such as Village Gateways. In this regard it also refers to negotiating with private developers to ensure on and off-site measures. An amendment is suggested in order the better reflect the Core Strategy policy.	
	BR12		In general conformity with Herefordshire Local Plan Core Strategy. c-Depending on the level of development a Transport Assessment or statement maybe required. All development which proposed new accesses on to the highway should provide a full 7 day- speed and volume survey undertaken during term time. With the proposed visibility splays meeting the 85th%ile speed required under DMRB, MfS 2 and Herefordshire Council Design guide. Add new e) Providing better access to and support for more use of public transport, new cycling and walking links to serve the community and to provide safer routes to Bridstow Primary School. Conformity noted.	See Changes Nos 8, 30 and 31
			The need for transport assessments is acknowledged as very important to development within the Parish, given the constraints posed by the network passing through it. Reference to the need for such assessments to show that developments can meet the policy requirements and also those set out in Herefordshire Council's Design Guide for New Development would be most appropriately located within the supporting statement top the policy. The specific highway surveys required are understood to be set out in that document and others referred to within it. The suggested addition to the policy to refer to public transport, cycling and walking, and safer routes to school is useful.	
	BR13		In general conformity with Herefordshire Local Plan Core Strategy. The settlement boundaries identified are in line with Policy RA2 areas of proportionate growth 4.14 and 4.15. Refer to Map 2 in the policy. F-The design and supporting infrastructure should encourage active travel use. Conformity noted. The final version of the NDP will include Parish Policies Maps prepared by Herefordshire Council in its house style and will not be numbered as such and hence no reference to a Map number need be made. The suggested addition to support active travel is useful although might, more appropriately, be included in policy BR9 covering sustainable design.	See Change No 24
	BR14		In general conformity with Herefordshire Local Plan Core Strategy. E Health (Air/Water/Waste) comment – you should also note that some farm buildings may be used for the storage of potentially contaminative substances (oils, herbicides, pesticides) or for the maintenance and repair of vehicles and machinery. As such it is possible that unforeseen contamination may be present on the site. Consideration should be given to the possibility of encountering contamination on the site as a result of its former uses and specialist advice be sought should any be encountered during the development.	No change proposed in response to the representations in relation to conformity and contaminated land. For the matter of noise impact see
			Environmental Health and Trading Standards Service - key concern with regard to this Neighbourhood Plan are the road traffic noise impacts from the A40 and A49 which the plan does not address for future occupants. This is contrary to the Planning Practice Guidance for Noise which specifies that the acoustic environment must be taken into account in the design and layout of the site. In this regard to we have significant concerns regarding the proposed settlement site.	Appendix A.

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			There is a high risk of adverse impacts from road traffic noise at this location with no scope for sufficient noise	
			mitigation. We are of the opinion that this site is unsuitable for housing development.	
			Conformity noted. The issue of contaminated land is covered by policy BR9(e). In relation to noise see Appendix A	
	BR15		In general conformity with Herefordshire Local Plan Core Strategy.	See Change No 24
			The design and supporting infrastructure should encourage active travel use.	-
			Conformity noted. The suggested addition to support active travel is useful although might, more appropriately, be included in policy BR9 covering sustainable design.	
	BR16		In general conformity with Herefordshire Local Plan Core Strategy.	No change proposed
			E Health (Air/Water/Waste) comment Site i) - A review of Ordnance survey historical plans indicates the proposed site appears to have had no previous historic potentially contaminative uses.	in response to the representations in relation to conformity
			Site ii) A review of Ordnance survey historical plans indicates the site has historically been used as an orchard. By way of general advice, I would mention that orchards can be subject to agricultural spraying practices which may, in some circumstances, lead to a legacy of contamination and any development should consider this.	and contaminated land. For the matters of noise and highways
			Site iii) A review of Ordnance survey historical plans indicates the proposed site appears to have had no previous historic potentially contaminative uses.	impact see Appendix A.
			Site iv) A review of Ordnance survey historical plans indicates the proposed site appears to have had no previous historic potentially contaminative uses.	
			Site v) A review of Ordnance survey historical plans indicates the proposed site appears to have had no previous historic potentially contaminative uses.	
			Site vi) A review of Ordnance survey historical plans indicates a Builder's Yard site for was situated immediately adjacent to the south of the allocated site. It is possible that unforeseen contamination may be present at the above-mentioned	
			site. Consideration should be given to the possibility of encountering contamination as a result of its former use and specialist advice be sought should any be encountered during the development.	
			Environmental Health and Trading Standards Service - key concern with regard to this Neighbourhood Plan are the road traffic noise impacts from the A40 and A49 which the plan does not address for future occupants. This is contrary to the	
			Planning Practice Guidance for Noise which specifies that the acoustic environment must be taken into account in the design and layout of the site. In this regard to we have significant concerns regarding the proposed settlement site at far western end of the Bannutree Map 3 which is right up against the A40 [NB There is some confusion here in that there are no sites right up against the A40 at the far western end of the Map. It is assumed that A40 should read A49 and affect	
			site B16(iii) which is at the far western end of the map adjacent to a trunk road]. There is a high risk of adverse impacts from road traffic noise at this location with no scope for sufficient noise mitigation. We are of the opinion that this site is unsuitable for housing development.	
			 Highway comments: All these parcels of land would have to assess the impact of the development on the highway and meet the appropriate standards. They need to also assess sustainable routes and modes of travel. i) Land amounting to around 0.45 hectares at Bridruthin, Bannuttree. 	

Stakeholder	Section/ Policy Number	Support/Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			 Depending on the size of the development, the impact of the increased vehicles movements on Bannuttree lane needs to be assessed. It should also be reviewed by Highway England due to the location of the A49 and A40. Developments over 5 dwelling would need to be built to HC adoptable standards. ii) Land amounting to around 0.4 hectares at the Old Vicarage, Bannuttree. Whilst the site is located near to the primary school there is no footway connecting to the school and further afield. Any development should look to review the provision of a footway and provide a footway adjacent to the carriageway which meets the required gradients. iii) Land amounting to 0.16 hectares at Whitecross, Bannuttree. Any development here would have to be assessed by Highways England as they would need an access on to the A49. iv) Land amounting to around 0.8 hectares at Oaklands, Buckcastle Hill. Depending on the size of the development, the impact of the increased vehicles movements on C1261 needs to be assessed especially the narrow section on the C1261 by Rock Cottage. An appropriate access needs to be provided and would need to meet HC design guidance and MfS 2 guidance. It is not known if an access can be achieved to the required standard with land owned by the applicant or in highway land. Developments ower 5 dwelling would need to be built to HC adoptable standards. v) Land amounting to around 0.4 hectares at Foxdale, Buckcastle Hill. Depending on the size of the development, the impact of the increased vehicles movements on C1261 needs to be assessed especially the narrow section on the C1261 by Rock Cottage. An appropriate access needs to be provided and would need to meet HC design guidance and MfS 2 guidance. It is not known if an access can be achieved to the required standard with land owned by the applicant or in highway land. Developments over 5 dwelling would need to be built to HC adoptable standards.<	
	Paras 8.18 to		Conformity noted. The issue of contaminated land is covered by policy BR9(e). In relation to noise and highway impacts see Appendix A Instead of Herefordshire Council's Standards, 'Herefordshire Council's design guidance'.	See Changes Nos 41,
	8.22 bullet 3		Noted and need for change accepted	42, 43, 44 and 45
	BR17		In general conformity with Herefordshire Local Plan Core Strategy. Policy noted and have listed this within our putative list of Conservation Areas, to be investigated at the next review. Conformity Noted. Possibility of including in a future Conservation area review noted.	No change proposed in response to this representation
	BR18		In general conformity with Herefordshire Local Plan Core Strategy. Noted	No change proposed in response to this representation
	BR19		In general conformity with Herefordshire Local Plan Core Strategy. Noted	No change proposed in response to this representation

Stakeholder	Section/ Policy Number	Support/Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
	BR20		In general conformity with Herefordshire Local Plan Core Strategy. Noted	No change proposed in response to this representation
	BR21		In general conformity with Herefordshire Local Plan Core Strategy. Noted	No change proposed in response to this representation
	BR22 (1)		In general conformity with Herefordshire Local Plan Core Strategy. Amenity open space and local green space need to mapped in different colours to differentiate amenity open space and designated green space. Conformity noted. The two designations have been shown in different colours – Amenity Open Space in green with a dark green dashed border and Local Green Space as green with an orange dashed border. The error is in relation to the notation panel for Map 5 which should have indicated Amenity Open Space and not Local Green Space. It is understood that Herefordshire Council will produce the settlement policies map for the Regulation 16 stage using its house style for consistency across all neighbourhood plans.	See Change No 53
	BR22 (2)		In general conformity with Herefordshire Local Plan Core Strategy. There are two BR22 policies, rename to Policy 23. Conformity noted. Grateful for identifying this error	Policies to be renumbered as appropriate
	BR23		In general conformity with Herefordshire Local Plan Core Strategy. Noted	No change proposed in response to this representation. Renumber policy to be BR24.
	Village Policies Map	Seeks change	 E Health (Air/Water/Waste) recommend that any proposed sites in future NDPs are labelled in maps with clear IDs to help with referencing and identification. The parish boundary/neighbourhood area needs to marked onto the policies map especially for Wilton, as it should be noted that the NA runs down the middle of the River Wye, and therefore will have an impact on the biodiversity area policy they have in their plan. Map 1- Site with planning permission- replace with commitment site The labelling of sites is consistent with the approach adopted by Herefordshire Council which seeks conformity across all neighbourhood plans. This is a matter that will need to be considered internally by Herefordshire Council. Noted that the NDP boundary should be marked mon the Wilton Policies Map. As Herefordshire Council will produce the next iteration of that map, it can be corrected then. 	See Change No 53
	Appendix 2 (Appendix 5 – para 3.1 – page 83)		Development of the footpath cycle network. Crossing facilities would enable the walking and cycling network to be extended - with particular crossing provision over the A49 at Bridstow Primary School. This is noted and might usefully be referred to in the supporting statement to policy BR11.	See Change No 29
	Appendix 2		There is no cycle network within the Parish or one to which links might be made within adjacent parishes. Bridstow does not sit on a national cycle route. It is unlikely that any specific cycle path will be provided within or adjacent to the Parish	See Change No 29

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
	(Appendix 5 – para 3.2 – page		during the plan-period. The council has long term ambitions to develop NCN46 across Backney Bridge should funding allow.	
	83)		This is noted and might usefully be referred to in the supporting statement to policy BR11.	
	Appendix 2 (Appendix 5 – para6.4 – page 86)		Crossing facilities over the A49 at Bridstow Primary School would address this barrier. This is noted and might usefully be referred to in the supporting statement to policy BR11.	See Change No 29
S.2	Whole plan	Support	DCWW are supportive of the aims, objectives and policies set out.	No change proposed
Welsh Water Dwr Cymru			Noted with thanks	as a consequence of this representation
(Statutory Consultee)	Policy BR8	Support	This policy provides the assurance that unless there is sufficient capacity at the Lower Cleeve Wastewater Treatment Works (WwTW), development will be delayed until it becomes available with developers able to fund the works. We can advise that we are currently undertaking a reinforcement scheme at Lower Cleeve WwTW within our current Capital Investment Programme (AMP6 – 2015-2020), which is due for completion by 31st March 2020. As such, we are currently requesting that Herefordshire Council include a Grampian style planning condition on any new development within the WwTW catchment to restrict communication to the public sewerage network until this date. On completion of this reinforcement scheme, there will be no issue in the WwTW accommodating the foul-only flows from the growth proposed in the NDP. Noted with thanks	No change proposed as a consequence of this representation
	Policies BR14 and BR16	Support	There are no specific issues anticipated with either the public sewerage or water supply networks in serving the proposed allocations, though some level of offsite mains/sewers may be required in certain instances in order to connect to the existing networks.	No change proposed as a consequence of this representation
S.3 Historic England (Statutory Consultee)	Whole Plan (primarily historic environment)	Support	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 Bridstow. We are pleased to note that the Plan evidence base is generally well informed by reference to the Herefordshire Historic Environment Record including the Herefordshire Landscape Character Assessment and we are supportive of both the content of the document and the vision and objectives set out in it. We commend the general emphasis given to the conservation of landscape character and the maintenance of local distinctiveness. The commitment to support well designed locally distinctive development that is sympathetic to the character of the area including its rural landscape character, views and green spaces is equally commendable. The recognition of the importance of Historic Farmsteads being sustainably and sensitively converted and of the need to take account of archaeological remains is also welcomed.	No change proposed as a consequence of this representation
S5 Natural England (Statutory Consultee)	Whole plan, SEA and HRA	No comments received	Despite a reminder, no comments were received from Natural England and it is therefore assumed that it has no comments to make. No comments received	No change proposed
S.6	Whole Plan	Comment	Confirms that, in the absence of specific sites allocated within areas of fluvial flooding, would not offer a bespoke comment. You are advised to utilise the attached Environment Agency guidance. Please note that the Flood Map	

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
Environment Agency			provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with the drainage team at Herefordshire Council as the Lead Local Flood Authority (LLFA).	No change proposed as a consequence of
(Statutory Consultee)			Comments noted. Herefordshire Council, as the LLFA, was consulted on the draft NDP, and has not commented on this matter. Grateful for the advice that all the sites are located outside of SPZ1.	this representation
S.7 Highways	Policy BR11		Policy BR11 states that Bridstow Parish Council will work with Highways England to introduce measures to improve the road network. We consider this policy to be a suitable approach in addressing highway issues.	See Change No 28
Agency (Statutory	Policies BR14		Support for this policy is welcome and might be recognised in its supporting statement HE considers that due to the proximity of the allocated sites to the SRN, and the highway issues raised relating to the	See Appendix A
Consultee)	and BR16		A40 and A49, there will be some impacts on the operation of the SRN as a result of the proposals detailed in the Neighbourhood Development Plan. We would expect that some of these sites may need to investigate the need for a Traffic Impact Assessment as well as the form of access required for each allocated site. Highways England welcomes consultation on the scope for either Transport Statements or Transport Assessments and can provide advice if required. See Appendix A	
S.8 Coal Authority	Whole Plan	Comment	No specific comments to make Advice is very helpful and noted	No change proposed as a consequence of this representation
S.9 National Grid	Whole Plan	Comment	The High-Pressure Gas Pipeline: FM02 - Ross to Treaddow does not interact with any of the proposed development sites. Whilst there are no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. Noted with thanks. The email sent to which the advice has been received from National Grid is the consultation under the Regulation 14 stage of the neighbourhood plan regulations. Further consultation upon the NDP at Regulation 16 and upon any subsequent planning applications will be undertaken through Herefordshire Council's processes.	No change proposed as a consequence of this representation
S.10 Wye Valley AONB	Whole Plan	Support	Welcome the Bridstow NDP. The overall recognition of the AONB designation – referenced 66 times in the document, for example in paragraph 2.22, 3.5, 3.45, 4.2.1.a), BR1a, BR2, BR3, BR4, 6.7, BR19, BR20, 9.7, 9.8 and Appendix 1, 2 & 5, establishes a robust foundation for the NDP. Noted with thanks	No change proposed as a consequence of this representation
	Paragraph 2.16	Support	Welcome the reference to the 'Picturesque' here. Noted with thanks	No change proposed as a consequence of this representation
	Paragraph 2.22	Recommend change	The phrase "tree cover should be retained or strengthened" should itself be strengthened to read 'tree cover should be retained <i>and</i> strengthened'. It is acknowledged that the reference to tree cover for the Principal Settled farmlands Landscape Type does promote the strengthening of tree cover associated with settlements although it also indicates that this should not include new woodland as these would be out of place and compromise landscape character. The suggested change with some	See Change No 8
	Paragraph 3.8	Comment	further explanation is therefore proposed. The reference to "climate change" in the last sentence is highly appropriate.	

	mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
		Noted with thanks	No change proposed as a consequence of this representation
Policies BR1 and BR2	Recommend change	BR1 & BR2: BR1 refers to the AONB and "its character, its important natural and historic features" and BR2 refers to "the landscape quality, beauty, character and features of the Wye Valley AONB". Both Policies and/or the accompanying text should mention the Wye Valley AONB Management Plan, a statutory document of the local authority under Section 89 of the Countryside & Rights of Way Act 2000, which identifies 'Special Qualities' and associated Landscape Management Zone (LMZ) 'Features' – which are closely aligned to the Herefordshire LCA. Consequently, it would be appropriate and robust to include reference to "the Special Qualities identified in the Wye Valley AONB Management Plan." The suggestion is helpful and accepted.	See Changes No 16 and 17
Paragraph 6.3	Recommend change	1st sentence states "Where development does not amount to 'major development' and is generally acceptable, there is still a need for sites to reduce any adverse effects on any the settings of settlements and the wider rural landscape." The statutory purpose of AONB designation is "to conserve and enhance natural beauty" and NPPF para 172 states "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues." Similarly, NPPG Paragraph: 036 Reference ID: 8-036-20190721 states "that strategic policies should provide for the conservation and enhancement of landscapes". Consequently, it would be more appropriate to rephrase this sentence to emphasise 'conservation and enhancement' rather than just "reduce any adverse effects". Therefore we suggest rewording to read ' <i>Where development does not</i> <i>amount to 'major development' and is generally acceptable, there is still a need for sites to conserve and enhance the</i> <i>AONB including the settings of settlements and the wider rural landscape.'</i>	See Change No 19
Paragraph 6.4	Recommend change	 6.4: We welcome the reference to the AONB Management Plan. However we believe it could be better integrated to the context of the paragraph. NPPG Paragraph: 040 Reference ID: 8-040-20190721 states "Management plans for National Parks, the Broads and Areas of Outstanding Natural Beauty help to set out the strategic context for development. They provide evidence of the value and special qualities of these areas, provide a basis for cross-organisational work to support the purposes of their designation and show how management activities contribute to their protection, enhancement and enjoyment. They may contain information which is relevant when preparing plan policies, or which is a material consideration when assessing planning applications." Also, NPPG Paragraph: 036 Reference ID: 8-036-20190721 states "The cumulative impacts of development on the landscape need to be considered carefully." This should be reinforced in this paragraph. We therefore suggest rephrasing 6.4 to read: <i>The character of the Wye Valley AONB within the Parish varies between two-character areas and some of their</i> 	See Change No 20
	BR2 Paragraph 6.3	BR2 change Paragraph 6.3 Recommend change Paragraph 6.4 Recommend	BR2 change "the landscape quality, beauty, character and features of the Wye Valley AONB". Both Policies and/or the accompanying text should mention the Wye Valley AONB Management Plan, a statutory document of the local authority under Section 89 of the Countryside & Rights of Way Act 2000, which identifies' Special Qualities' and associated Landscape Management Zone (LMZ) 'Features' – which are closely aligned to the Herefordshire LCA. Consequently, it would be appropriate and robust to include reference to "the Special Qualities' and associated Landscape Plan." Paragraph 6.3 Recommend change Is stentence states "Where development does not amount to 'major development' and is generally acceptable, there is still a need for sites to reduce any adverse effects on any the settings of settlements and the wider rural landscape." The statutory purpose of AONB designation is "to conserve and enhance natural beauty" and NPF para 172 states "Great weight should be given to conserving and enhancing landscape and secinc beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues." Similarly, NPPG Paragraph: 036 Reference ID: 8-036-20190721 states "that strategic policies should provide for the conservation and enhancement of rather than just "reduce any adverse effects". Therefore we suggest rewording to read 'Where development does not amount to 'major development' and is generally acceptable, there is still a need for sites to conserve and the wider rural landscape." The suggestion is helpful and accepted. Paragraph 6.4 Recommend chance ement of landscapes". Consequently, it would be more appropriate to rephrase this sentence to emphasise 'conservation and enhancement' rather than just "reduce any adverse effects". Therefore we suggest rewording

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			and Herefordshire Local Plan Core Strategy policy LD1, there is guidance included in Herefordshire Landscape Character Assessment Supplementary Planning Document that needs to be taken into account and in the Wye Valley AONB Management Plan. Furthermore, measures should be taken, where appropriate, to enhance the landscape. Opportunities should always be looked for. This can be done through requiring detailed landscaping schemes and carefully considering cumulative impacts of development on the landscape. Herefordshire Local Plan Core Strategy Policy LD1 also specifically refers to the need to enable appropriate uses and management."	
	Paragraph 6.7	Recommend change	The suggestion is helpful and accepted with some minor wording changes1st sentence states "Wildlife is acknowledged as an important contributor to the character and scenic beauty of the WyeValley AONB." It would be more robust to refer the 'AONB Special Qualities' as these are identified in the statutory WyeValley AONB Management Plan. Therefore, rephrase the sentence to read: "Wildlife is acknowledged as an importantcontributor to the character, scenic beauty and Special Qualities of the Wye Valley AONB."	See Change No 23
	Paragraph 9.7	Recommend change	The suggestion is helpful and accepted The last sentence doesn't read well and repeats the phrase "should such proposals be advanced" Suggest rewording to 'Should such proposals be advanced a properly evidenced case should be made on the basis that economic and other public benefits would be provided and evidence that provision cannot be met elsewhere outside of the AONB.' The suggestion is helpful and accepted with a minor wording change	See Change No 50
	Appendix 2, sub Appendix 6, Site Assessment for site W1 – Land off Wilton Lane	Comment	This site has now been rejected through Appeal. The context and conclusion should be updated to reflect this recent decision. Noted and change to the supporting document proposed to indicate this.	Changes made to the Site Assessment Report to reflect the appeal dismissal.

Appendix A:

Bridstow Neighbourhood Plan – Regulation 14 Representations upon Housing Policies

- 1. Introduction
- 1.1 Meeting the required level of proportional housing growth has and continues to be challenging within the Parish, a fact acknowledged by Herefordshire Council and reflected in a number of planning decisions made by that Council and also the Planning Inspectorate. The combination of the whole Parish falling within the Wye Valley AONB while it is criss-crossed by two trunk roads, one of which (A40) forms part of a link between the M50 and M4, has heightened the level of constraints above that encountered elsewhere within the County.
- 1.2 **National planning policy restricts 'major development' within AONBs, with the need to consider alternatives,** including outside of the designated neighbourhood plan area, if suitable local sites are not available. This is outside of the scope of the NDP. Bridstow Parish Council has, however, agreed a Memorandum of Understanding with Ross-on Wye Town Council that could be called upon, if required, to assist it with meeting its housing growth requirement. Highways England (HE) is responsible for managing the two trunk roads. Following an approach, the Parish Council was advised that HE would respond to consultation on proposals and policies in its draft NDP at the Regulation 14 stage. Its views have now been received and where appropriate, informed the response to representations below.
- 1.3 The majority of representations received relate to policies and proposals for housing sites. There is a need to consider these representations collectively because the effects of any changes need to be seen within the wider context.
- 1.4 The Parish Council is aware that should it consider its area cannot accommodate the required level of housing growth, it must present clear evidence to this effect. This is also necessary to comply with the Memorandum of Understanding with Ross-on-Wye Town Council which, should this be shown to be the case, has agreed to accommodate up to 15 of the Parish's housing growth requirement as an addition to its own growth.
- 1.5 The following sections consider, firstly the overall approach to meeting housing growth, then the individual policies/proposals, and finally representations about other site options, before drawing an overall conclusion. Summaries of representations received are set out drawn from comments included in the main Schedule of Representations.
- 2. Approach to Housing
- 2.1 <u>Representations</u>
 - No provision has been made for affordable housing (C.10; C.11; C.12; C.23)
 - The process of site selection is unclear with no attempt to identify any appropriate parameters for constructing a plan. Calling for sites seems a haphazard way of achieving a coherent plan. There is little evidence of a rigorous analysis of the area, in terms of housing need against the specific parameters. There is no clear analysis of why sites were rejected or accepted. (C.12).
 - Ross-on-Wye can make up for the deficit in housing provision reducing the need for sites, especially at Buckcastle Hill (C.10).
 - To deliberately set out not to meet the housing land target would void the understanding made with Ross Town Council (C.13).
 - The cumulative effect of development on settlements, especially along the Hoarwithy Road at Buckcastle Hill, would result in highway dangers, especially at the pinch point by Rock Cottage; the speed limit is exceeded; there is no footpath; there are developments in other villages along it; and the road is used by heavy agricultural traffic (C.5; C.11; C.12; C.13; C.16; C.22; C.23; C.25).

- Development along the Hoarwithy Road is disproportionate to other parts of the Parish (C.22).
- Buckcastle Hill has no facilities (C.23).
- There are better alternative sites (C.13).
- It is unclear whether the landowners of the proposed sites are serious about releasing them for development and there are good reasons for doubting this (C.20; C.21).
- No viability assessment has been undertaken of the sites and there are at least two where this is potentially problematic (C.20; C.21).
- Herefordshire Council's Highway advice has not been taken into account (C.20; C.21).
- The views on sites identified for support or rejection and mapped at the Community Consultation in (Open day for NDP) in 2016 should be taken into account (C.22).

2.2 <u>Affordable Housing</u>

National and Core Strategy policies expect planning applications for sites proposing 11 or more dwellings to contribute towards meeting affordable housing needs. Should any of the sites proposed meet this requirement then it is expected that they would make such a contribution unless a viability assessment shows that the housing development on the site cannot be delivered. It is acknowledged that only a limited number of sites are large enough to accommodate developments of this size. However, to achieve the level of houses required to require affordable housing might not comply with other policies in the NDP, for example on design within the particular location. In addition, their size is such that a developer would be unlikely to exceed 10 dwellings and the suggested number of houses indicated as the contribution to the proportional housing growth requirement reflects this.

Size of site was a major concern for residents in that during consultations and other debate and feedback through public comments at the NDP Working Group meetings, significant emphasis was placed upon proposing small sites and no large sites. This was also seen as being in accordance with national policy for developments within the AONB which restricts major development other than in exceptional circumstances. A recent planning application for a large development within Bridstow (Buckcastle Hill) was refused and dismissed at appeal partly on these grounds. Another constraint upon large scale development is seen as the capacity of the local highway network which was why a range of suitable small sites spread across and **through the Parish's settle**ments is proposed.

The Parish has very limited facilities. Ross-on-Wye sits adjacent to Bridstow Parish and will accommodate larger developments providing affordable housing to serve the Housing Market Area. The NDP (paragraph 8.24) acknowledges that should a specific need for affordable housing be identified then this might be met through Core Strategy policy H2.

2.3 Call for Sites and Site Selection

In assessing sites, the Strategic Housing Land Assessments (SHLAA) for both settlements undertaken by Herefordshire Council identified no suitable sites for development within the Plan period. That assessment carried out a number of 'Calls for Sites' and this is an accepted mechanism to assess housing land availability. A local 'Call for Sites' was made and given publicity, including through the local press. With few suitable sites resulting from the first call, landowners surrounding settlements were approached and a second call for sites was undertaken. A limited number of further sites were identified through this process. It must be appreciated that a substantial part of the Parish is owned by one landowner.

The approach used to select sites was debated long and hard in public within the NDP Working Group and is **set out in the report '**Bridstow Neighbourhood Development Plan - Housing Land Assessment 2011-2031'. **The** approach is consistent with that used for many other NDPs. It uses criteria based upon advice given by Herefordshire Council in its Guidance Note 21.

2.4 Ross-on-Wye Can Accommodate any Deficit

Herefordshire Council indicated that it would require confirmation that Ross-on-Wye Town Council was prepared to accept the addition of any shortfall to its required housing growth with a formal arrangement put in place for this to be considered. Bridstow Parish Council and Ross-on-Wye Town Council have such a formal **agreement through a Memorandum of Understanding that would allow 15 dwellings of the market town's** excess provision to be used to meet any shortfall <u>provided</u> that Bridstow Parish Council had used its 'best efforts' to meet its required level of proportional housing growth (See Appendix 9 to the report 'Bridstow Neighbourhood Development Plan - Housing Land Assessment 2011-2031').

Ross-on-Wye NDP is awaiting its referendum, having been examined, but has yet to be adopted. The minimum housing requirement for the market town is 900 dwellings over the period 2011 to 2031. At April 2018, dwellings built, with outstanding planning permissions and upon the strategic housing site at Hildersley already provided for 943 dwellings. At that time there were a number of planning applications awaiting determination (potential 67 dwellings) and the NDP proposed additional sites, estimated to accommodate 63 further dwellings. Hence it has the capability to accommodate the maximum of 15 dwellings that might be required.

At the time Regulation 14 Draft Bridstow NDP was published the sites proposed together with reasonable estimates for windfall allowances suggested that it might be possible to meet the required level of proportional housing growth. This is notwithstanding there were concerns about a number of sites, particularly in terms of highway access and safety, and noise and air pollution. Advice for a number of sites upon the first two matters could only be obtained from Highways England through consultation at the Regulation 14 stage. This, together with advice from other statutory organisations, has now been received, assessed and used to inform revisions to the NDP. The effects of any changes that may be made as a consequence and the need to utilise the offer by Ross-on-Wye Town Council is considered later within this Appendix.

2.5 <u>Cumulative Effect of Development on Highway Safety at Buckcastle Hill</u>

The concerns about the nature and extent of traffic passing along the Hoarwithy Road through Buckcastle Hill are acknowledged as is the pinch point at Rock Cottage. The Parish Council is aware of the highways reason for the dismissed appeal for 35 dwellings at Foxdale but notes that a major consideration was the generation of a large number of peak hour trips around the entrance to the site.

Written informal advice was received from Herefordshire Council' Transportation section upon a number of sites, including some of those proposed at Buckcastle Hill prior to the preparation of the NDP (see Addendum 1). Herefordshire Council's highway advice at that time in relation to sites being investigated at Buckcastle Hill was:

"Depending on the size of the development, the impact of the increased vehicles movements on C1261 needs to be assessed, especially the narrow section on the C1261 by Rock Cottage. An appropriate access needs to be provided and would need to meet HC design guidance and Mfs 2 guidance. It is not known if an access can be achieved to the required standard with land owned by the applicant or in highway land. Developments over 5 dwelling would need to be built to HC adoptable standards."

Not all of the three housing sites proposed in the NDP were being considered at the time the above advice was received. The three sites are expected to provide some 16 dwellings in total. They will be served by 3 separate accesses and hence dispersed to a greater degree than was the case with the dismissed appeal.

Recently planning permission for 8 dwellings was granted on a site within this settlement (Code P181237). A **transport assessment was submitted with that application and Herefordshire Council's highways ad**vice upon this was:

"After reviewing the submitted transport report and undertaking further site visits, it is concluded that the

proposed development would not be classed as severe in highways terms. Using the industry standard (TRICS), for assessing proposed development vehicle movement, volume and speed surveys, the site will only look to increase vehicles at peak times by 3, therefore would not have a detrimental impact to the highway. A site visit was also undertaken at the narrow section of highway by Rock Cottage in the morning peak time to assess the impact of the vehicle movements and pedestrians, only 2 pedestrians were recorded during a 2-hour period. The site adjacent to Rock Cottage was also reviewed for an introduction of priority give way system; however, the forward visibility could not be achieved therefore if developed this would have the potential for the increase of issues on the highway. Manual for street shows width carriageways which can accommodate certain vehicle types. 5.5m can comfortably accommodate a HGV and a car passing, with the dimension of 4.8m stating that while the width is reduced it still accommodate the traveling vehicles."

None of the proposed three sites are indicated to exceed 8 dwellings in terms of their contributions to the required level of proportional housing growth. It is expected that their development would be at a reasonably low density to reflect surrounding development and that of the development referred to above. On this basis and for the purposes of the NDP, it is reasonable to assume that 16 dwellings might generate a pro-rata increase in vehicles at peak time of 6. Should they wish to exceed the number suggested, the effects of a greater level of development will need to be supported through a transport assessment.

The point at which Herefordshire Council, as Highway Authority, considers the amount of traffic using the narrow section on the C1261 by Rock Cottage exceeds its capacity is unknown. Similarly, there is no evidence available to suggest that an assessment has been undertaken to indicate whether minor works might add, albeit marginally, to safety and capacity at this point. It is noted that although signs for a bend in the road and road narrowing have been placed to the south of Rock Cottage, there are none to its north.

Alternatives that might be explored along the Hoarwithy Road through Buckcastle Hill include those that reduce the feeling of space motor vehicles have, which may help to reduce their speeds. Another example of such measures was identified by Herefordshire Council when consulted at an earlier stage upon the site which now has planning permission (see Addendum 1 site Bk6). This should be a matter for discussion with Herefordshire Council, developers and the community under policy BR11.

Should capacity at Rock Cottage be reached during the plan period and before all the proposed housing sites at Buckcastle Hill allocated in the NDP come forward, this would be a factor indicating that the plan may not be able to deliver its required level of proportional housing growth. Concerns have been expressed that growth at Sellack and Hoarwithy which also lie along the route of the Hoarwithy Road would also add to traffic passing through Buckcastle Hill and the pinch point at Rock Cottage. However, Sellack is not identified within Herefordshire Core Strategy as a settlement where development should take place. The NDP covering Hoarwithy (Ballingham, Balstone and Hentland Group Parish NDP – 'Made' on 1st April 2019) does not propose any housing allocation for that village but considers that limited infilling within a its narrowly defined settlement boundary is sufficient to ensure the small amount of required housing growth is provided for.

As it stands, unless Herefordshire Council undertakes a comprehensive transport assessment, the point where the capacity at the point of concern is reached will only be ascertained through the submission of transport assessments in association with planning applications. This may be a matter to raise with Herefordshire Council as part of the review of the Core Strategy that is underway. The sites might be allocated on the basis that they can only come forward where the transport assessment indicates that their effects on the local network, especially at the narrow section of the road near Rock Cottage, will not be classed as severe.

Changes are proposed in light of the above (See Changes Nos 30, 45, 46 and 47).

Development within the Area of Special Character (Policy BR17) may also be affected by this requirement although there are no specific housing site allocations and compliance with policy BR12 would require transport assessments if considered necessary.

The possibility that this might be required should be emphasised (See Change No 48).

There are many other settlements within the County without footpaths, with traffic of a similar nature and with roads accommodating agricultural traffic. These have similarly had to accommodate housing developments and the issue has not provided an in-principle restriction upon development.

2.6 <u>Disproportionate Level of Growth along the Hoarwithy Road</u>

The ability to spread housing growth across the various settlement areas within the Parish depends upon the availability of suitable sites. It was not possible to give this consideration any weight in view of the sites submitted for consideration.

2.7 <u>No facilities at Buckcastle Hill</u>

It was not possible to give proximity to facilities any weight in determining which sites should be allocated for housing. Factors for choosing between sites came down to a limited number of more critical ones given the sites offered and constraints present.

2.8 <u>There are Better Alternatives</u>

The NDP must take into account the deliverability of sites and for this they have to be availability. All available sites were assessed using a consistent approach.

2.9 <u>Doubts about the Seriousness that Proposed Sites will be released for Development</u>

There will always be a degree of uncertainty about whether a site will be released for development within the plan period. Of the 7 sites proposed within the NDP, only two of the landowners have not utilised agents in contacts about the NDP. The use of a consultant suggests a reasonable degree of interest in releasing land **for development. Of the two sites where an agent has not been used, both came through the 'Call for Sites'** and one was previously the subject of a planning application, albeit for a larger area which was refused. This issue will be addressed for each specific site below.

2.10 <u>Site Viability Assessments</u>

NPPF paragraph 122 requires planning policies to take into account local market conditions and viability. Planning Practice Guidance provides advice upon viability and plan making. A major element of this is explained to be the contributions that development is required to make towards infrastructure such as education, health, transport, flood and water management, green and digital infrastructure. It is assumed that County-wide policy requirements will have been assessed by Herefordshire Council when preparing its Core Strategy and Planning Obligations SPD. There is provision to seek reduced or nil payment of planning obligation fees where this may affect the viability of an otherwise acceptable site. There is currently no Community Infrastructure Levy scheme in place. The payment levels within any scheme would need to be tested in terms of viability when it is produced.

The NDP does not propose developments of 11 or more houses on any site such that there would be a requirement to provide affordable housing. Currently Herefordshire Council does not seek financial contributions in accordance with its Planning Obligations Supplementary Planning Document for developments of 10 or less dwellings.

Planning Practice Guidance also indicates that 'Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable.' (Paragraph: 003 Reference ID: 10-003-20180724)

It is considered that most local site requirements will have a marginal effect on viability, comprising normal development costs such as connection to public infrastructure and high specification landscape requirements because of location within the AONB. It is, however, acknowledged that there are a number of sites where specific local site conditions may go beyond this and affect viability.

In terms of how this might apply to NDPs, Planning Practice Guidance indicates that, in taking into account relevant policies, such assessments should be 'proportionate'. In addition, '*Plan makers can use site typologies to determine viability at the plan making stage'*. The grouping of sites should reflect the nature of typical sites that may be developed within the plan area and the type of development proposed for allocation in the plan. Evidence showing the development and successful marketing of properties with characteristics forming the particular typology is considered a proportionate approach to determining viability for the purposes of the NDP.

The viability of the two sites has been questioned on the basis that the additional development costs necessary to address noise and air pollution have not been considered. There is evidence that sites in similar locations along the A40 or A49 have received planning permission, and most have or are being developed and have proved to be marketable. Notwithstanding other issues that may be relevant to determining whether sites can be delivered, this level of evidence is considered a reasonable and proportionate response to the requirement to show that sites proposed in the NDP are viable within the terms of Planning Policy Guidance.

2.11 Herefordshire Council's Previous Highway Advice

Herefordshire Council's previous written advice upon those sites for which it had commented (Addendum 1) is referred to in the site assessment sheets in the Housing Land Assessment Report. Although it has offered views upon sites that have access directly onto or relatively close to the trunk roads, the advice indicates that Highways England is the Highway Authority and should be consulted. The advice in relation to development at Buckcastle Hill is considered in paragraph 2.5 above. In addition, Herefordshire Council indicated measures that might be undertaken to reduce vehicle speed through the settlement. Where available, Herefordshire Council's highway advice upon planning applications/appeals and within its Strategic Housing Land Availability Assessment has also been used.

Highways England indicated it would provide advice at the Regulation 14 consultation stage. Its comments have now been received and taken into account for each relevant site below.

2.12 <u>Community Consultation Map</u>

The Community Consultation map gave an indication of preferences at the beginning of the NDP process. As work on the plan developed, site availability and constraints became more important in suggesting which sites met the requirements to deliver the housing required.

3. Policy BR13 – Housing Development in Wilton

- Proposed boundary does not allow for improvements to the Conservation Area which is in a poor state (C.16).
- Proposed boundary does not allow for development in Wilton (C.16).
- Restricting development of Wilton is not in line with the need to plan positively (C.16).

3.2 Boundary should provide for improvements to the Conservation Area

Ross-on-**Wye Conservation Area is identified as 'at risk' by Historic England. No Conservation Area Appraisal** has been undertaken for this Conservation Area by Herefordshire Council to identify where enhancement measures might be undertaken. The inclusion of land opposite Wilton Cottages within the settlement boundary should assist the enhancement of this area which falls within the Conservation Area. There is no potential to enhance the Conservation Area through a further settlement boundary extension to the northwest which is defined by the A40 trunk road. Wilton Castle Scheduled Ancient Monument sits immediately to the north-east of the settlement boundary and the River Wye and its banks to the south-east, both limiting measures in those directions. Land outside of the settlement and Conservation Area boundary to the southwest comprises open fields within the AONB offering extensive views across to Ross-on-Wye and as such is important to the setting of the market town. A recent dismissed appeal recognised the importance of this area to the Conservation Area – see para 12.2 below.

3.3 <u>The Proposed Boundary does not allow for Development in Wilton</u>

The proposed settlement boundary for Wilton in the draft NDP provides for some development opposite Wilton Cottages. Other forms of development, accommodating economic activity or community facilities, may be possible where they meet policies in the NDP.

There is no requirement within the Core Strategy for the Parish's housing growth target to be met through allocations in both its named settlements. Housing allocations have been made based upon an assessment of availability and suitability.

3.4 <u>Restricting Development of Wilton is not Planning Positively</u>

The requirement is to plan positively within the Parish as a whole. The NDP attempts to do this within the notinconsiderable constraints that exist.

3.5 <u>Conclusions in relation to these representations upon Policy BR13</u>

No changes are proposed in relation to these representations.

4. Policy BR14 – Housing Site in Wilton

- Would tidy up an area of Wilton that it visibly poor (C.13).
- Some increased Highways risk but not as great as in some of the other plots (C.13).
- Herefordshire Council had previously expressed concerns over access to the roundabout indicating that consultation with Highways England was required (C.20; C.21).
- Highways England considers that due to the proximity of the allocated sites to the SRN, and the highway
 issues raised relating to the A40 and A49, there will be some impacts on the operation of the SRN as a result
 of the proposals detailed in the Neighbourhood Development Plan. It would expect that some of these sites
 may need to investigate the need for a Traffic Impact Assessment as well as the form of access required for
 each allocated site. Highways England welcomes consultation on the scope for either Transport Statements or
 Transport Assessments and can provide advice if required (S7).
- This is contrary to the Planning Practice Guidance for Noise which specifies that the acoustic environment must be taken into account in the design and layout of the site. Housing development would result in health risks from noise and air pollution (C.20; C.21; S.1).
- A recent planning application at Wilton Lane (within 200m) was refused as satisfactory levels of amenity could not be achieved (C.20; C.21).
- The Wilton site has been on the market for an extended period recently (C.20; C.21).

- The abnormal costs of complying with conditions in the policy and the modest end values suggest viability is questionable (C.20; C.21).
- 4.2 <u>Would tidy up an area of Wilton that it visibly poor</u>

Agree. This is seen as a benefit to the edge of the settlement and Ross-on-Wye Conservation Area, which has been **identified by Historic England as 'At Risk'.**

4.3 <u>Highways Access/risk</u>

The site assessment in the Housing Site Assessment Report made reference **to Herefordshire Council's earlier** written advice upon the site which is acknowledged. It also pointed to previous permissions for the use of land for car parking in association with both the existing hotel and a proposed restaurant. The latter suggests that there is a level of traffic generation that might be acceptable. At an initial approach Highways England advised that highways advice would be provided at the formal Regulation 14 stage.

Highways England advice has now been received. This indicates that a traffic impact assessment may be required. From this, it is not possible to discern whether acceptable highway arrangements can be achieved for the development of this site without such an assessment as part of a planning application. However, the previous planning permission for car parking suggests that some level of traffic generation is possible.

4.4 <u>Noise and Air Pollution and Levels of Amenity</u>

The site assessment in the Housing Site Assessment Report identified this as an issue and looked at how Herefordshire Council had considered similar locations elsewhere, in particular close to junctions along the A40. Although not ideal, there are examples of development in locations close to the trunk roads. However, this site is located at a major junction where traffic brakes, idles and accelerates. Consequently, considerable **weight is given to the advice of Herefordshire Council's Environmental Health Officers who have, elsewhere,** pointed to availability of housing sites elsewhere within the County where the effects from traffic noise and associated air pollution would not have a significant adverse effect on residential amenity.

4.5 Housing Market Issues and Availability

The site had been purchased by the current owner for a commercial use that was unable to obtain planning permission. Contact was made with the site owner who engaged an architect to draft a scheme to show the NDP Working Group how the land might be developed. The landowner has maintained informal contact and was understood to be appointing a planning agent to assist in the development of proposals for the site. Paragraph 2.10 above outlines issues relating to viability assessments. There are developments that have taken place recently along the A40 and elsewhere which are in similar locations to this site and that have been built and sold or where construction work is proceeding. Addendum 2 provides further details.

4.6 <u>Conclusions in relation to these representations upon Policy BR14</u>

The site comprises previously developed land and some form of development may be appropriate to enhance Ross-on-Wye Conservation Area. It is not possible to confirm safe access arrangements and effect upon the Strategic Road Network are acceptable but more importantly the site suffers from significant noise and air pollution effects arising from proximity to the A40 at Wilton roundabout. The professional advice from **Herefordshire Council's relevant officers in relation to this latter aspect cannot be disregarded.**

The site should be removed as a housing allocation but remain within the settlement boundary to enable suitable uses, sensitively designed, that would be appropriate to the settlement's location. (see Changes Nos 34, 35, 36, 37 and 53).

5. Policy BR15 – Housing Development in Bridstow

5.1 <u>Representations</u>

- Representations were received that were specific to a site or sites covered by policy BR16 and shown.
- Traffic impact assessments may be required for sites within the development boundaries to assess the impact of the development on the highway, meet the appropriate standards and provide suitable mitigation measures where necessary. They also need to assess sustainable routes and modes of travel. (S.1 and S.7)
- 5.2 The potential need for transport assessments should be recognised and a change to policy BR12 is proposed to indicate this. Similarly, a change to that policy is proposed to refer to the need to consider better access to public transport and promoting cycling and walking.

5.3 <u>Conclusion in relation to these representations upon Policy BR15</u>

A change is proposed to Policy BR12 to recognise the need for transport assessments (see Change No 30).

6. Policy BR16 i) - Land at Bridruthin, Bannuttree.

- Access too close to Wye Bungalow and would adversely affect its residential amenity and that of other nearby properties (C.2; C.17; C.13).
- Bannuttree Lane is too narrow for development with no public footpath. (C.13: C.17)
- Its use is restricted by on street parking and additional traffic. (C.17)
- The A49 junction is unsafe (C.13)
- Herefordshire Council previously considered that the site was unlikely to be acceptable on highways grounds because of the existing Bannuttree Lane junction, the narrowness of the lane and the problems in achieving sight lines which meet HC guidance requirements. Consultation with Highways England was required (C.20; C.21).
- Depending on the size of the development, the impact of the increased vehicles movements on Bannuttree Lane needs to be assessed. It should also be reviewed by Highway England due to the location of the A49 and A40. Developments over 5 dwelling would need to be built to HC adoptable standards. (S.1)
- Highways England considers that due to the proximity of the allocated sites to the SRN, and the highway
 issues raised relating to the A40 and A49, there will be some impacts on the operation of the SRN as a result
 of the proposals detailed in the Neighbourhood Development Plan. It would expect that some of these sites
 may need to investigate the need for a Traffic Impact Assessment as well as the form of access required for
 each allocated site. Highways England welcomes consultation on the scope for either Transport Statements or
 Transport Assessments and can provide advice if required (S7).
- The number and type of houses developed on the site cannot be guaranteed. (C.17)
- Adjacent land is also understood to be available for development through the site. (C.17).
- Development would increase the risk of being burgled. (C.17)
- The potential development depends upon the demolition of the existing dwelling. Work has recently been done on the house from scaffolding and there is a local understanding that the current occupier has a lifetime right of occupation (C.20; C.21).
- There are potential questions about whether the development of the proposed site is likely to be financially viable given the 'abnormal' costs involved and the modest end values which are likely to be potentially achievable (C.20; C.21).
- 6.2 <u>Adverse Effect on Residential Amenity</u>

This is a design issue that is capable of being addressed through NDP policy BR10. The area available within the site is sufficient to enable a layout of a similar character and density to dwellings surrounding it without having a significantly adverse effect on the amenity of neighbouring properties. The assessment indicates that adjacent land within the same ownership may be required to provide an access and this was shown in the **submission by the landowner's agent in the scheme submitted to the NDP Working Group, which also included** the replacement of the current dwelling, Brindruthin.

6.3 <u>Highway Safety Issues</u>

The site assessment in the Housing Site Assessment Report made reference to Herefordshire Council's written advice upon the site which is acknowledged. Herefordshire Council's advised that Highways England needed to be consulted upon the acceptability of the site's development. At an initial approach Highways England advised this would be done at the formal Regulation 14 stage.

It should be possible to meet Herefordshire Council's standards set out in its Design Guide for access to the site from Bannuttree Lane. The site is in the same ownership as the house Bridruthin which has a large garden on its southern side and there is therefore potential to ensure any access to the site is of sufficient width and visibility to meet design requirements and ensure that the amenity of the adjacent property is not adversely affected. It is accepted that the road serving the site is narrow, but this will influence the scale of development that could be accommodated. It is suggested that low rise dwellings, preferably of bungalows, would be most appropriate. This and other requirements are set out in paragraph 8.18. Policies BR10 and BR15 would be particularly relevant in guiding the form and nature of development.

Herefordshire Council's highway advice at the Regulation 14 stage (S.1) suggests that some level of

development should be possible in terms of the matters that it is responsible for and the level of development should be determined through a traffic impact assessment. Highways England comments similarly indicate a traffic impact assessment may be required.

Although the NDP assumes a contribution of 8 dwellings to the required level of proportional housing growth, the highways advice suggests some uncertainty about this figure. The suggested 8 dwellings for the site would be expected to generate 44-51 trips over a 16-hour day (an average of around an extra 3 per hour). The peak hour trip generation would be influenced by the type of development and the NDP suggests this should be low-rise, reflecting adjacent properties. The level and type of development appears similar to that quoted for the planning permission referred to in section 2.5 above (Code P181237). However, a transport assessment in accordance with amended policy BR12 would enable a more accurate figure for the acceptable level of development to be defined.

An assessment should also consider the effect on junctions onto the Strategic Road Network. There are two options available: one on to the A40 and one onto the A49. Visibility for the right turn at the latter (to travel to Ross-on-Wye, connect to the A40 at Wilton roundabout and to the south east more generally) is particularly restricted. There would appear to be better visibility at the junction onto the A40, albeit that the approaching traffic speed is far greater and there is only a left turn. However, this only causes a minor inconvenience for travel to the south-west because of the proximity to Wilton roundabout. Again, it is not possible to discern from the advice received whether acceptable highway arrangements can be achieved for the development of this site without a traffic impact assessment as part of any planning application.

6.4 Extent of Housing, including extension on to Adjacent Land

It is not possible to stipulate an exact number of dwellings to be built upon any site and the figure quoted in the supporting statement for site is for the purposes of suggesting the contribution that is expected towards the required level of proportional housing growth. However, the suggested level reflects the general density of the area, the need to restrict numbers in view of the highway constraints, and the suggested form of **development put forward by the landowner's agent. NDP policies BR10, BR**12 and BR15 are particularly **relevant and emphasised in the site's supporting statement paragraph 8.18.**

It is assumed that the **reference to 'adjacent site'** in the relevant representation above is to land to the southeast of this site. The land was not submitted for consideration through any of the 'Calls for Sites'. Should the **Regulation 14 plan's proposed development boundary be adopted, land further to the south would fall outside** of this boundary and there would be a presumption against its development. Should the NDP housing policies no longer apply, then the highway and amenity requirements would remain material considerations.

6.5 <u>Community Safety Considerations</u>

Community safety concerns such as that suggested are a design issue and the nature of the site is such that it should be capable of providing a secure environment in terms of viewing from any public space within the site.

6.6 <u>Housing Market Issues and Availability</u>

The landowner engaged an architect to draft a scheme to show the NDP Working Group how the land might be developed. This did show the demolition of that property, which the Working Group were advised was in need of substantial renovation. Development of the site does not depend upon the demolition of the property within the wider ownership although it is likely that part of the garden on its south-western side would be required to enable a satisfactory access. There is space for this as the existing dwellings sits on the north-east side away from the proposed allocation. Paragraph 2.10 above outlines issues relating to viability assessments. There are developments that have taken place recently along the A40 and elsewhere which are in similar locations to this site and that have been built and sold or where construction work is proceeding. Addendum 2 provides further details.

6.7 <u>Conclusions in relation to these representations upon Policy BR16(i)</u>

There remains some uncertainty that the site can be developed as a consequence of the highway impacts. **Herefordshire Council's advice suggest**s that some development may be possible. A traffic impact assessment in association with any planning application would be essential to determining not only how much development might be accommodated but to satisfy Highways England that any development can take place upon this site. In all other respects the site is capable of accommodating the suggested level of development. The wider effect of such uncertainty is considered further at section 17.

<u>Changes are suggested to emphasise the need to meet requirements set out elsewhere in the NDP and including, especially, the need for a transport assessment with any planning application (See Change 41).</u>

7. Policy BR16 ii) - Land at the Old Vicarage, Bannuttree.

- Potential highway issues and safety of school children (C.13).
- Highways England considers that due to the proximity of the allocated sites to the SRN, and the highway
 issues raised relating to the A40 and A49, there will be some impacts on the operation of the SRN as a result
 of the proposals detailed in the Neighbourhood Development Plan. It would expect that some of these sites
 may need to investigate the need for a Traffic Impact Assessment as well as the form of access required for
 each allocated site. Highways England welcomes consultation on the scope for either Transport Statements or
 Transport Assessments and can provide advice if required (S7).
- Minimal effect on neighbouring properties (C.13) Noted
- Subsequent to the original discussions the property has been placed on the market. The sale particulars (on the Rightmove website) specifically contrast the property with other former rectories/vicarages, noting that many (such residences have been) subsequently spoilt by development taking place within their former grounds (C.20; C.21).

• Whilst the site is located near to the primary school there is no footway connecting to the school and further afield. Any development should look to review the provision of a footway and provide a footway adjacent to the carriageway which meets the required gradients. (S.1)

7.2 <u>Highway Safety</u>

It is possible to provide an access to the proposed site that meets the visibility requirements set out in He**refordshire Council's Highways Design Guide for New Development for the number of dwellings suggested.** The level of traffic generated should not have a significant effect on the safety of children attending the Primary School. Herefordshire Council has not **objected to the site's inclusion. There is a footpath from the** school entrance to the A49 and along its length both to Ross on Wye and to the west. The entrance to the development site will be almost opposite the entrance to the Primary School where the public footpath commences.

Although Highways England's comment suggests that not all the sites allocated within the NDP need traffic impact assessments, it has not indicated which these might be. The need for such a traffic impact assessment as part of any planning application would therefore need to be investigated. This should also consider the issues raised by Herefordshire Council.

7.3 <u>Site Availability</u>

The landowner appointed an agent to submit the site for consideration. Having approached the agent about availability following this representation, the advice is that the landowner would very much still like to make the land available for housing.

7.4 Effect on the Setting of The Old Vicarage

The form of development within the site and its relationship to the Old Vicarage are matters that were given considerable thought and reference made to how these might be addressed in NDP paragraph 8.19. These might be supported further through reference to those policies within the NDP that are relevant to the issues raised.

7.5 <u>Conclusions in relation to these representations upon Policy BR16(ii)</u>

The landowner through, the agent has confirmed the site is available. Important design elements listed in the supporting statement should be emphasised. Notwithstanding Highways England may require a traffic impact assessment, no fundamental objection to the site is obvious, and the assessment should also address transport matters raised by Herefordshire Council.

Changes are proposed to address these issues (See Change No 42).

8. Policy BR16 iii) - Land at Whitecross, Bannuttree.

- Any development here would have to be assessed by Highways England as they would need an access on to the A49. (S.1).
- Highways England considers that due to the proximity of the allocated sites to the SRN, and the highway issues raised relating to the A40 and A49, there will be some impacts on the operation of the SRN as a result of the proposals detailed in the Neighbourhood Development Plan. We would expect that some of these sites may need to investigate the need for a Traffic Impact Assessment as well as the form of access required for each allocated site. Highways England welcomes consultation on the scope for either Transport Statements or Transport Assessments and can provide advice if required (S7).

- This is contrary to the Planning Practice Guidance for Noise which specifies that the acoustic environment must be taken into account in the design and layout of the site. Site suffers from noise pollution from traffic (S.1).
- This site is exceptionally narrow and any houses would be no more than a very few yards from the 24/7 noise and fumes of the A49 carriageway, raising major questions about the attractiveness of any housing to the market, even if potential policy constraints on the development could be overcome. Viability is potentially problematic (C.20; C.21).

8.2 Noise and Air Pollution and Levels of Amenity

The site assessment in the Housing Site Assessment Report did not identify the effects of noise and air pollution from the A49 as an issue given Herefordshire Council's consideration of a planning application at that time on land adjacent to Woodhouse Lodge (Code P183507/F). However, a subsequent permission (Code P191034/F) granted after the Regulation 14 NDP was published raised noise from the trunk road as a consideration although this did not result in refusal of planning permission. However, this site is closer to the trunk road and at a lower level where it may be less able to utilise attenuation measures. The professional advice from Herefordshire Council's Environmental Health Officer is accepted as an important consideration that should be given significant weight and raises a high level of uncertainty in terms of whether the site is deliverable.

8.3 Housing Market Issues and Availability

The landowner's agent has produced a preliminary layout to show the NDP Working Group how the land might be developed. This indicates that there is space for the development suggested. Paragraph 2.10 above outlines issues relating to viability assessments. Reference is made above to a recently granted planning permission in this location which is of a similar type of development. There are developments that have taken place recently along the A40 which are in similar locations in relation to the highway to this site and that have been built and sold or where construction work is proceeding. Addendum 2 provides further details.

8.4 <u>Highway Safety</u>

Although Highways England's comment suggests that not all the sites allocated within the NDP need traffic impact assessments, it has not indicated which these might be. However, planning permission has recently been granted for two dwellings off this access. The need for a traffic impact assessment of part of any further planning application using this access may need to be investigated as part of any planning application in order to indicate whether a further small development would require additional mitigation or prove to be unacceptable.

8.5 <u>Conclusions in relation to these representations upon Policy BR16(iii)</u>

Notwithstanding Highways England may require a traffic impact assessment, the fundamental objection to the site arises from the effect of noise and pollution on residential amenity. The site does fall within an area where change has occurred such that the boundary for the settlement has been extended in this direction and **its inclusion would appear reasonable within the terms of the advice issued in Herefordshire Council's** Neighbourhood Planning Guidance Note 20.

The site should be deleted as a housing allocation although the land retained within the settlement boundary (See Changes No 38, 39, 40, 43 and 53).

- 9. Policy BR16 iv) Land at Oaklands, Buckcastle Hill.
- 9.1 <u>Representations</u>

- Development along the Hoarwithy Road would result in highway dangers, especially at the pinch point by Rock Cottage, the speed limit is exceeded, there is no footpath, there are developments in other villages along it, and the road is used by heavy agricultural traffic (C.5; C.11; C.12; C.13).
- There has been no highway advice from Herefordshire Council upon this site (C.20; C.21).
- Depending on the size of the development, the impact of the increased vehicles movements on C1261 needs to be assessed especially the narrow section on the C1261 by Rock Cottage. An appropriate access needs to be provided and would need to meet HC design guidance and MfS 2 guidance. It is not known if an access can be achieved to the required standard with land owned by the applicant or in highway land. Developments over 5 dwelling would need to be built to HC adoptable standards. (S.1)
- Development is outside of the settlement boundary (C.11).
- The large number of trees upon the site should be preserved (C.12)
- Development of the site should require some affordable housing (C.12)
- Would have a significant adverse effect on the residential amenity of neighbouring properties (C.13; C.20; C.21).
- The development would result in 4 bedroomed dwellings which are not needed (C.10).
- Adverse effects on the landscape of the Wye Valley AONB (C.23).

9.2 <u>Highway Safety</u>

The landowner has suggested a development comprising 5 dwellings, which would be served by a private drive. The gap in the frontage providing access to the site measures some 7.5 m in width. Visibility appears to meet Herefordshire Council's requirements set out in its Design Guide for New Development. Other matters raised are addressed in paragraph 2.5 above, including a change to take into account Herefordshire Council's concern about the narrow section on the C1261 by Rock Cottage.

9.3 <u>Settlement Boundary</u>

There is currently no defined settlement boundary for either of the Parish's settlements. The purpose of the NDP is to define one in accordance with Herefordshire Local Plan Core Strategy paragraph 4.8.23. Herefordshire Neighbourhood Plan Guidance Note 20 gives advice upon defining settlement boundaries and that has been taken into account. It indicates that proposed housing sites should be included within such boundaries.

9.4 <u>Tree Preservation</u>

The trees affected by the proposed allocation fall around the periphery of the site. It is a requirement under the Planning Acts for the amenity value of any trees affected by a planning application to be assessed with a view to considering whether they should be protected through the use of Tree Preservation Orders. This is emphasised in policy BR17(e) which applies to the site. NDP policy BR4 also requires tree cover to be maintained and added to where appropriate.

9.5 <u>Provision for Affordable Housing</u>

The development constraints are such that the threshold for a requirement to provide affordable housing is unlikely to be met.

9.6 <u>Effect on the Amenity of Neighbouring Properties</u>

This is a design issue that is capable of being addressed through NDP policy BR10. The area available within the site is sufficient to enable a layout at a density similar to that of neighbouring properties without having a significantly adverse effect on neighbouring properties. The gap providing the access is 7.5 meters and **sufficient to meet Hereford Council's guidance for** a private access to serve 5 dwellings without adversely affecting neighbouring properties.

9.7 <u>Type of Housing</u>

The character of the area within which the site sits suggests that detached properties are most likely to result from the policies proposed. The mix of dwelling sizes achieved should be looked at on a Housing Market Area

basis and not in relation to specific sites. It is a matter to be determined through a planning application in accordance with relevant Core Strategy policies.

9.8 Effect on the Landscape of the Wye Valley AONB

A degree of effect upon the landscape will need to be accepted in order to accommodate necessary development. There are policies in the NDP to minimise adverse effects, particularly where those are considered significant. Special provisions apply to this site through policy BR17 which takes into account the particular characteristic. A change is proposed to emphasise the need for a high-quality landscape scheme to be prepared and implemented.

9.9 Housing Market Issues and Availability

The site was submitted by the landowner.

9.10 <u>Conclusions in relation to these representations upon Policy BR16(iv)</u>

There are a range of design matters that need to be addressed in relation to this site referred that should ensure important material considerations are taken into account. These are referred to in the supporting statement but might be emphasised. The need for Tree Preservation Orders to be considered should also be referred to. The matter of the narrow section of road on the C1261 by Rock Cottage suggests there may be some uncertainty about the capacity of the highway. This is a wider issue for the NDP in that the capacities of both the roads and junctions present problems for most if not all sites. This is considered further at section 17.

Changes are proposed to address these issues (See Change No 44).

10. Policy BR16 v) - Land at Foxdale, Buckcastle Hill.

10.1 <u>Representations</u>

- Development along the Hoarwithy Road would result in highway dangers, especially at the pinch point by Rock Cottage, the speed limit is exceeded, there is no footpath, there are developments in other villages along it, and the road is used by heavy agricultural traffic (C.5; C.11; C.13: C.22).
- Depending on the size of the development, the impact of the increased vehicles movements on C1261 needs to be assessed especially the narrow section on the C1261 by Rock Cottage. An appropriate access needs to be provided and would need to meet HC design guidance and MfS 2 guidance. It is not known if an access can be achieved to the required standard with land owned by the applicant or in highway land. Developments over 5 dwelling would need to be built to HC adoptable standards. (S.1)
- There is poor visibility from the driveway onto the Hoarwithy Road (C.5; C.13; C.22).
- Adverse effects on the landscape of the Wye Valley AONB (C.5; C.23).
- Would have a significant adverse effect on the residential amenity of Burnt House (C.5; C.10; C.13; C.22).
- Development is outside of the settlement boundary (C.11).
- The development would result in 4 bedroomed dwellings which are not needed (C.10).

10.2 <u>Highway Safety</u>

Policy BR12 requires safe access to be available. This **would be informed by Herefordshire Council's Highways** Design Guide for New Developments. Herefordshire Council has accepted the use of the access for a limited development through the granting of permission under code P171109/O and it is understood this would be considered a shared private drive that might accommodate up to 5 dwellings (2 already permitted). On this basis it is considered that development served by a private drive for up to 5 dwellings appears to be acceptable. The other highway matters raised are addressed in paragraph 2.5 above.

10.3 Effect on the Landscape of the Wye Valley AONB

A degree of effect upon the landscape will need to be accepted in order to accommodate necessary development. There are policies in the NDP to minimise adverse effects, particularly those that are considered significant. Policies BR3 and BR4 refer to effect on the landscape, including that of the AONB. The expected **level of development is not considered 'major development'. The scale of development will be small**, and it should be possible to minimise the effect on the landscape by appropriate tree planting.

10.4 Effect on the Amenity of Neighbouring Properties

This is a design issue that is capable of being addressed through NDP policy BR10 which includes protection for residential amenity, including the appropriate degree of privacy. This is described in greater detail within Bridstow Neighbourhood Development Plan – Housing Land Assessment 2011-2031 report. (NB this report is provided as Appendix 2 to the Regulation 14 Consultation Draft Plan – see Appendix 5, paragraph 4.1 to that Appendix.) The area available within the site is sufficient to enable a layout for the number suggested (3 dwellings) at a density similar to that of neighbouring properties without having a significantly adverse effect on Burnt House.

10.5 <u>Settlement Boundary</u>

There is currently no defined settlement boundary for either of the Parish's settlements. The purpose of the NDP is to define one in accordance with Herefordshire Local Plan Core Strategy paragraph 4.8.23. Herefordshire Neighbourhood Plan Guidance Note 20 gives advice upon defining settlement boundaries and that has been taken into account. It indicates that proposed housing sites should be included within such boundaries.

10.6 <u>Type of Housing</u>

The character of the area within which the site sits suggests that detached properties are most likely to result from the policies proposed. The mix of dwelling sizes achieved should be looked at on a Housing Market Area basis and not in relation to specific sites. It is a matter to be determined through a planning application in accordance with relevant Core Strategy policies.

10.7 Housing Market Issues and Availability

The site was submitted by the landowner with a sketch showing how 3 dwellings might be located within the area proposed. A larger site was the subject of a planning application that was refused. This smaller area represents a more modest scheme and planning permission has already been granted for a detached house just outside the northern end of the allocated area. This history suggests there is good reason to believe the site will be available for development.

10.7 <u>Conclusions in relation to these representations upon Policy BR16(v)</u>

There are a range of design matters that need to be addressed in relation to this site that should ensure important material considerations are taken into account, in particular the need to ensure the amenity of Burnt House is protected. These are referred to in the supporting statement but might be emphasised. The matter of the narrow section of road on the C1261 by Rock Cottage suggests there may be some uncertainty about the capacity of the highway. This is a wider issue for the NDP in that the capacities of both the roads and junctions present problems for most if not all sites. This is considered further at section 17.

Changes are proposed to address these issues (See Change No 45).

11. Policy BR16 vi) - Land at Cotterell's Farm, Buckcastle Hill.

11.1 <u>Representations</u>

- Development along the Hoarwithy Road would result in highway dangers, especially at the pinch point by Rock Cottage, the speed limit is exceeded, there is no footpath, there are developments in other villages along it, and the road is used by heavy agricultural traffic (C.5; C.10; C.11; C.13; C.22; C.23).
- There has been no highway advice from Herefordshire Council upon this site (C.20; C.21).
- Depending on the size of the development, the impact of the increased vehicles movements on C1261 needs to be assessed especially the narrow section on the C1261 by Rock Cottage. An appropriate access needs to be provided and would need to meet HC design guidance and MfS 2 guidance. It is not known if an access can be achieved to the required standard with land owned by the applicant or in highway land. Developments over 5 dwelling would need to be built to HC adoptable standards. (S.1)
- Adverse effects on the landscape of the Wye Valley AONB (C.10; C.22; C.23).
- Ribbon development along the Hoarwithy road would conflict with the character of the settlement (C.10; C.22).
- Development is outside of the settlement boundary (C.11).
- Would have a significant adverse effect on the residential amenity of neighbouring properties (C.13; C.20; C.21).
- The development would result in 4 bedroomed dwellings which are not needed (C.10).
- There is a planning history to this site SH/890212/PF in 1989 by a previous owner of the field was refused planning permission on highway and AONB issues (C.22; C.23; C.25).

11.2 <u>Highway Safety</u>

Herefordshire Council's comments in relation to planning application code P181237 were used to inform consideration of the highway safety implications for this site when it was first proposed. Further advice has been received from that Council in relation to formal consultation upon the draft NDP. These and others received are addressed in paragraph 2.5 above.

11.3 Effect on the Landscape of the Wye Valley AONB

A degree of effect upon the landscape will need to be accepted in order to accommodate necessary development. There are policies in the NDP to minimise adverse effects, particularly those that are considered significant. In this instance there is a range of more specific provisions to ensure that development of the site fits sensitively into the landscape and edge of the settlement, including reflecting the approach taken at Littlefields and set out in planning permission code P181237.

11.4 <u>Development would result in Ribbon Development along Hoarwithy Road.</u>

The proposed site extends away from the Hoarwithy Road with a minimum frontage to enable access and one building with further development deeper into the site. As referred to above, specific provisions to address the character and setting of the settlement are made.

11.5 <u>Settlement Boundary</u>

There is currently no defined settlement boundary for either of the Parish's settlements. The purpose of the NDP is to define one in accordance with Herefordshire Local Plan Core Strategy paragraph 4.8.23. In accordance with Herefordshire Neighbourhood Plan Guidance Note 20, proposed housing sites should be included within such boundaries.

11.6 Effect on the Amenity of Neighbouring Properties

This is a design issue that is capable of being addressed through NDP policy BR10. The area available within the site is sufficient to enable a layout at a density similar to that of neighbouring properties without having a significantly adverse effect on neighbouring properties.

11.7 <u>Type of Housing</u>

The character of the area within which the site sits suggests that detached properties are most likely to result from the policies proposed. The mix of dwelling sizes achieved should be looked at on a Housing Market Area basis and not in relation to specific sites. It is a matter to be determined through a planning application in accordance with relevant Core Strategy policies.

11.8 <u>Previous Planning Permissions</u>

Herefordshire Council's planning records are only available online from 2000. Planning policy has changed over the period since 1989 and the older a planning decision may be, the less weight that might be given. Herefordshire Local Plan Core Strategy gives significant weight to the need to accommodate required levels of proportional housing growth. Nevertheless, highway safety and effect on the landscape of the Wye Valley AONB remain valid considerations. Highway advice in relation to a similar site in the vicinity did not recommend refusal and there appears to be sufficient distance to meet visibility standards. Herefordshire Council's response to formal consultation on the draft NDP at Regulation 14 has not raised any objection to the site. The scale of development indicated ought not to amount to major development within the AONB and criteria have been set to minimise the effect on the landscape with the form of the allocation wrapping closely around the existing built form and linking with Cotterell's Farm.

11.9 Housing Market Issues and Availability

The site was submitted by the landowner and broad concepts for development discussed with an agent.

11.10 <u>Conclusions in relation to these representations upon Policy BR16(vi)</u>

There is a range of design matters that need to be addressed in relation to this site that should ensure important material considerations are taken into account, in particular the need to ensure the amenity of adjacent dwellings and measures to address the impact on the landscape. A number are referred to in the supporting statement but might be emphasised, while others added. The matter of the narrow section of road on the C1261 by Rock Cottage suggests there may be some uncertainty about the capacity of the highway. This is a wider issue for the NDP in that the capacities of both the roads and junctions present problems for most if not all sites. This is considered further in section 17.

Changes are proposed to address these issues (See Change No 46).

12. Alternative Site – Land off Wilton Lane

12.1 <u>Representations</u>

- Highways England has approved improvements that would enable additional traffic movements at the Wilton Lane A40 junction (C.16).
- The conclusion about effect on the landscape of the AONB is at odds with the professional advice contained in the Landscape Visual Impact Assessment provided (in the planning application) (C.16).
- The SHLAA (2015) (for the site) contains errors and is not fit for purpose (C.16)
- The conclusion about effects on amenity (noise and air quality) do not take into account building design and a landscape buffer (C.16).
- The scoring in the site assessment for the site should be reassessed to take into account lower levels of impact and this would affect the ranking (C.16).
- 12.2 The assessment of sites was carried out to consider the relative differences been site options and not whether a site might obtain planning permission. In that regard the scoring is considered consistent across those sites that were assessed. The criteria used were a mixture of those used to judge between competing sites (i.e. informed a ranking of sites in order of those most suitable) while acknowledging other criteria might rule a

site out completely. Since the assessment was undertaken a planning application was made for this site, permission refused by Herefordshire Council, and an appeal dismissed by the Planning Inspectorate. Details of the application and appeal decision can be found at - https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=183 187&search=Wilton%20Lane

- 12.3 It would be inappropriate to allocate this land for housing given the decision of the Planning Inspectorate.
- 13. Alternative Site Land at Tanglewood

13.1 <u>Representations</u>

- Highway issues could be addressed, possibly closing Cosy Lane at its east end and providing access to existing properties through development of the area. (C.13).
- Adds to traffic problems along the Hoarwithy Road. (C.13).
- A better access could be identified, including off of the A49 trunk road (C.22; C.24).
- Not all of this land need be developed, and restrictions applied (C.22).

13.2 <u>Highways Issues</u>

Cosy Lane is very narrow at its north-eastern end, requiring third party land to widen. There is a dwelling immediately upon the frontage of Cosy Lane close to that end. These severely restrict the ability to provide access to any development on the land from that lane. Opportunities for other access points were investigated as set out in the housing sites assessment report. A reduced site area suggested by the landowner's agent was also considered with access onto the Hoarwithy Road, but such an access point would be close to the junction with the A49. This was considered to be unsatisfactory for a number of reasons. Highways England advice would be critical to allowing a new access onto the trunk road and advice in relation to a planning application along this stretch identified there was a higher than average collision rate. Whether a traffic impact assessment might indicate a suitable access could be achieved in accordance with the advice of Highways England remains uncertain. The degree of uncertainty is considered high and such that it is not sufficiently realistic to provide a reasonable alternative housing site.

13.3 <u>Reduced Site</u>

A reduced site capable of accommodating 5 dwellings was considered but the same access problems were considered to arise.

13.4 <u>Conclusion</u>

Development of the whole site would amount to major development in a very sensitive location within the Wye valley AONB. The uncertainty that a suitable access could be achieved for either a large or small development is considered far greater than that for other sites assessed.

14. Alternative Sites – Land closer to the School

14.1 <u>Representations</u>

- Site would be closer to the Church and School (C.5; C.12)
- Sites preferable in terms of highway safety (C.12)

14.2 <u>Site Closer to the Church and School</u>

Such a site was explored and initially it was felt that there was an option available that might also benefit traffic problems associated with the Primary School. An access opportunity was identified and there may also have been alternatives. However, the landowner withdrew the site, considering it would have a significant adverse effect on the landscape. Other land further to the north was explored but the landowner indicated it was not available.

A site for a small development is proposed close to the Church within the grounds of The Old Vicarage. There are a number of constraints that would restrict the development of a larger area and these are identified under the site assessment for site Bt4 in the housing site assessment report.

14.3 <u>Conclusion</u>

Unless and until other land in this vicinity is indicated to be available, this is not a realistic option to pursue.

15. Alternative Site – Land west of Wilton roundabout (Site Bt3 in the Housing Site Assessment Report)

15.1 <u>Representations</u>

- Would provide an opportunity to improve Bannuttree Lane and the junction with the A49(C.13).
- Road safety an issue (C.13)
- Bannuttree Lane is too narrow for development with no public footpath. (C.13: C.17)
- Location of dwellings would need to protect residential amenity (C.13).
- As visible as other properties/sites on outskirts of Ross but could be mitigated (C.13).
- The last public consultation on the NDP only included a development of 9 bungalows on land at Bridruthin and not the land west of Wilton roundabout. The smaller site area on this land for 5 dwellings, does not provide for any improvements to Bannuttree Lane which that originally for 20 dwellings did (C.17).

15.2 <u>Highway Issues</u>

The highway constraints in relation to Bannuttree Lane are acknowledged and referred to in section 6 above. A proposal was advanced that sought to improve access. However, Highways England's comments upon whether this was acceptable could not be confirmed. The benefits were therefore uncertain in terms of highway safety compared to the constraints.

15.3 Effect of Site's Development on Residential Amenity

It is agreed that this would be a consideration, but sites of any size would normally provide the flexibility for this to be addressed.

15.4 <u>Effects on the Landscape</u>

The whole of Bridstow Parish falls within the Wye Valley AONB and this must be a consideration. Large sites **would be considered 'Major Development' which should normally be refused. The appr**oach taken in the NDP is to seek small sites in order to reduce the effect on the landscape. Any development on this area would have significant adverse landscape effects. There would be adverse effects on the setting of heritage assets, both Wilton Castle and The Old Vicarage, both of which are visible from the south and east. In addition, an objective set with the support of the community is to maintain the current gap between Wilton and Bridstow.

15.5 <u>Consultation on Site Options</u>

The draft NDP only proposes development on land adjacent to Brindruthin and no development on land to **west of Wilton roundabout. The figure of 9 dwellings on the Brindruthin land related to the landowner's** submission which included the demolition and replacement of the house Bridruthin. The NDP does not include the property Bridruthin within the proposed housing allocation although it does fall within the development boundary. (For further details about the site adjacent to Bridruthin, see section 6.) It is correct that the option for the smaller area to the west of Wilton roundabout would not enable an improvement to Bannuttree Lane.

15.6 <u>Conclusion</u>

The area referred to is not proposed for housing in the NDP. There are significant adverse landscape effects in relation to any large-scale proposal on this land. A smaller development would still have adverse landscape effects although to a lesser degree. However, it would amplify the highway safety problems associated with Bannuttree Lane. The land adjacent to Brindruthin is a better option to utilise any spare highway capacity in this vicinity.

16. Policy BR17 – Housing Development within Buckcastle Hill Area of Special Character

16.1 <u>Representations</u>

- Development along the Hoarwithy Road would result in highway dangers, especially at the pinch point by Rock Cottage, the speed limit is exceeded, there is no footpath, there are developments in other villages along it, and the road is used by heavy agricultural traffic (C.5; C.13).
- The whole area falls within the AONB and this should be sufficient in itself (C.25).
- Under whose authority can sites be deemed of special character (C.25)?
- There are two hillside sites ideal for development here either side of the lane above and beyond Cavendish Cottage (C.25).

16.2 <u>Highway Safety</u>

Herefordshire Council has not offered any observations upon the highway's aspects of this policy in its Regulation 14 draft plan response. However, the matters raised, have been addressed in paragraph 2.5 above. There may be a time when the level of traffic using the narrow section on the C1261 by Rock Cottage becomes unsustainable in terms of highway safety, but this is unlikely to be clarified until planning applications have been made with their associated traffic impact assessments.

16.3 <u>Need for Policy</u>

The area falls within the development boundary set for this part of Bridstow (Buckcastle Hill) and without clearly defining the form of development through the policy, its special character might be lost through a higher development density and potentially an estate form of development. The aim of the criteria within the policy is to avoid this.

16.4 <u>Policy Source</u>

The definition of special character is suggested in the NDP by the Parish Council in order to manage housing development so that the area retains its special character. It has been acknowledged by Herefordshire Council and promoted to the community as an appropriate response. It will be for the community to determine whether it wishes to accept the policies within the NDP through a referendum.

16.5 <u>Opportunities close to Cavendish Cottage</u>

Should these parcels fall within the development boundary and provided proposals come forward that meet criteria set out in policy BR17, it would be expected that they would receive planning permission. The parcels were not submitted through any call for sites and hence there is no certainty that they would be available. Should they come forward, they would contribute towards the windfall allowance figure within settlement boundaries (see NDP Table 1, row 4).

16.6 <u>Conclusion</u>

The policy aims to deliver a small amount of housing to contribute towards the windfall allowance through a form of development that maintains the character of hillside dwellings which occur in similar locations within the Wye Valley AONB. There are housing site allocations elsewhere in the settlement although concern that, in combination, they might exceed the capacity of the local road network, particularly the narrow section on the

C1261 by Rock Cottage. Consequently, planning applications may require traffic impact assessments, and change is proposed to highlight the need to comply with policy BR12 (See Change No 47).

17. Overall Conclusions

- 17.1 Many representations make reference to the effects of development on highway safety and this is not unsurprising given the nature of both the SRN and local network. Highway advice from both Herefordshire Council and Highways England does not specifically object to any of the allocated sites, but neither does it suggest any of them is capable of development. In all instances the need for traffic impact assessments should at least be investigated, if not prepared. As a consequence, there is uncertainty that some of the sites would be capable of delivery or delivery at reasonable cost. However, recent evidence through decisions upon planning applications and appeal decisions¹ suggests that by advocating small sites, the ability to accommodate the resulting traffic is improved. This should reduce the level of uncertainty for the sites proposed in the NDP although does not remove it completely.
- 17.2 Deliverability of sites is not just an issue for this NDP but in many NDPs where potential technical difficulties have been identified and covered by policy criteria that require more detailed studies. There is a requirement for a proportionate approach to be taken and the relevant agencies have been consulted providing advice to the extent that they are able. It will be for the Examiner to determine whether the NDP meets the Basic Conditions.
- 17.3 Should the number of dwellings be reduced through proposed housing sites being found unsatisfactory as a consequence of traffic impact assessments the shortfall might be made up by:
 - higher levels of development that may be possible on other sites where this is supported through a traffic impact assessment. A limited number of sites are of a size and in a location where a higher density may be possible subject to satisfactory traffic impact assessments;
 - infill development elsewhere within settlement boundaries as suggested through the windfall allowances; and

• the allowance provided through the Memorandum of Understanding with Ross-on-Wye Town Council. Table 1 below contains updated figures as a consequence of planning permission P191034/F (2 dwellings). This shows that based on reasonable assumptions in relation to windfall allowances and the understanding with Ross-on-Wye Town Council, there is the potential to meet the required level of proportional housing growth.

- 17.3 It has been suggested that the number of sites might be reduced in view of the Memorandum of Understanding with Ross-on-Wye Town Council. To accept this would potentially invalidate the understanding in that the Parish will not have the evidence to show the proportional growth required cannot be achieved.
- 17.5 Herefordshire Local Plan Core Strategy indicates that continuous monitoring of policies and proposals is essential to ensure its objectives are achieved. If it appears that the policies are not being effective, the following actions will be taken:

¹

P142930/O – permission for 35 dwellings refused partly as a consequence of trip generation at each morning and afternoon peaks would significantly heighten the risk of accidents around the entrance to that particular site.

P171109/O – planning permission for 1 dwelling granted on a small part of the above site served by a private drive was not classed as a highways risk.

P181237, permission for 8 detached dwellings, traffic impact assessment expected to increase vehicles at peak times by 3 and as such was not considered to have a detrimental impact to the highway.

P183187 – permission for 9 dwellings refused because of effect on AONB and Ross-on-Wye Conservation Area Highways England recommended a condition be attached to any permission to widen the existing public footway close to the highway that it was responsible for. Herefordshire Council as the local highway authority carefully considered the proposal and objections received. It had no objection subject to minor improvements to the Wilton Lane/ B4260 junction and funding to review the speed limits on Wilton Lane.

• review of the policy or policies concerned and of the implementation mechanisms which may include a full or partial review of the plan; and

• actions to speed up the delivery of land for development; and/or

• identification of alternative or additional land through further Development Plan Documents and/or Neighbourhood Development Plans.

HC C	HC Core Strategy Minimum Requirement 2011 – 2031: 57 dwellings			
		Number of dwellings		
1	Number of completions and sites with outstanding planning permissions 2011-2019 (March) (source Herefordshire Council)	18		
2	Dwellings granted planning permission April 2019 to December 2020	2		
3	Sites:	(29)		
	1. Land at Bridruthin, Bannuttree	8		
	3. Land at the Old Vicarage	5		
	4. Land adjacent to Oaklands, Buckcastle Hill.	5		
	 Land adjacent to Foxdale, Buckcastle Hill. Land at Cotterell's Farm 	3		
		8		
4	Windfall allowance within settlement boundaries (see para 3.26)	7		
5	Rural windfall allowance (see para 3.26)	3		
6	Provision in Memorandum of Understanding with Ross- on-Wye Town Council	15		
7	Estimated total potential during plan period	74		

Table 1: Achieving the Housing Targe	- 2011 2021
	. 2011-2031

- 17.6 The Parish Council needs to work with Herefordshire Council to monitor the ability of the Parish to accommodate housing development. The following approach might be adopted as a partnership between the two councils to determine whether decisions on planning applications indicate local conditions are able to deliver what is proposed:
 - 1. To review the trend in the delivery of the anticipated windfall allowances on a regular basis.
 - 2. To monitor refusals of planning permission, especially on the grounds that a traffic impact assessment indicates a proposed site cannot be developed in principle or at excessive costs in terms of providing satisfactory highway safety mitigation measures.

Where this monitoring suggests that the approach adopted in the NDP is unable to deliver sufficient dwellings to meet the required level of proportional housing growth, the two parties should agree whether a review of the NDP is required or that the rural housing strategy set out in the Core Strategy, so far as it relates to Bridstow Parish, is not appropriate and should inform the review of the Core Strategy.

17.7 <u>Changes to update Table 1 (together with a commensurate change to paragraph 3.35), and to refer to the need to monitor development to inform future approaches to planning for housing in the Parish are proposed (see Changes Nos 5, 10, 48, 49 and 52).</u>

ADDENDUM 1: Herefordshire Council's Advice on Highway Matters during

the preparation of the Regulation 14 draft NDP.

Site Reference	Highway Advice
Site W1 – Land South- West of Wilton Lane	The access onto the A40 will require consultation with Highways England. The access on the B road has restricted visibility and therefore would not promote increasing the number of vehicles which use this site. One of the main issues on Wilton Lane is flooding. If the lane is flooded, then residents will be required to only use the A40 access and therefore increases the number of vehicles crossing the A40 dual carriageway and potentially accidents increasing. Connection to Ross is required therefore pedestrian and cycles routes and facilities should be reviewed. Concerns would be raised with regards to this site. Any increase to vehicles using this lane could have significant implications.
Site W2 – Land Adjacent to Wilton Cottages	Concerns with regard to vehicles turning in to and out of the junction. The junction in question has a lot going on in a short space of time therefore vehicles may not be aware of vehicles turning in or out of the lane. The site would have to be assessed as movements from a restaurant would be undertaken at different times - Peak time movements. Since the approved planning application vehicle numbers have increased. Highways England will need to be consulted. Any increase to vehicles using this lane could have significant implications.
Site Bk6 – Land at Littlefields	Gateway features can be provided as part of an agreement for a planning application. The moving of the 30-mph speed limit could be included in any provisions for the site, depending on the number of dwelling on the site (Chargeable request). Improvements in pedestrian and cycle facilities should be provided to promote sustainable travel to village facilities.
Site Bt2 - Land at Bridruthen, Bannuttree Lane	Bannuttree Lane is narrow, with no pedestrian facilities, therefore pedestrians have to negotiate the lane with oncoming vehicles. This site along with any other sites along Bannuttree Lane will have to negotiate crossing the A49, therefore crossing facilities should be provided and consultation with Highways England is required. Increasing the number of vehicles using Bannuttree Lane could increase the number of vehicles wanting to turn right across the dual carriageway of A40. There are significant concerns regarding this site and the need of pedestrians and cyclists. Any increase to vehicles using this lane could have significant implications.
Site Bt3 - Land to west of A40/A49 Wilton roundabout	Bannuttree Lane is narrow, with no pedestrian facilities; therefore pedestrians have to negotiate the lane with oncoming vehicles. This site along with any other sites along Bannuttree Lane will have to negotiate crossing the A49, therefore crossing facilities should be provided and consultation with Highways England is required. Increasing the number of vehicles using Bannuttree Lane could increase the number of vehicles wanting to turn right across the dual carriageway of A40. If a new suitable access on to the A49 was proposed and Bannuttree Lane was stopped up, a stopping up order would be required (chargeable services). Highways England is the controlling authority on the A49, therefore the new access would be under their authority. If a new community hub was proposed an assessment would be required on vehicles, pedestrian and cyclist movements along with sufficient parking provision meeting HC design guidance. There are significant concerns regarding this site and the need of pedestrians and cyclists. Any increase to vehicles using this lane could have significant implications.

Site B13 –	The site access will need to be confirmed, depending on how many dwellings are
Land at	proposed on site will require the access to be built to HC adoptable standards and
Oaklands	any pedestrian cycle facilities adopted.

Appendix B:

Bridstow Neighbourhood Plan – Regulation 14 Representations upon Need for Policies (Other than for Housing in Section 8)

18. Introduction

18.1 Representation C.20 comments:

'Whilst the Plan presents policies for a much wider range of issues (than housing), these are likely to have little, if any, practical effect. There is no significant market demand for any other forms of development. No significant funding is likely to be available to deliver aspirations for improvements in areas such as road safety and community facilities given the pressures on public expenditure. Equally, there is no serious likelihood of substantial developments which could provide S106 contributions – not least because the local key institutional landowner (the Duchy) is likely to be concerned about the reputational implications of the well organised public resistance that any such proposals would inevitably encounter.'

18.2 The following considerations are presented in order to assist the Parish Council to determine whether particular policies (other than those within section 8 of the draft NDP) might be of some utility and therefore retained. Reference is made, where applicable, to the National Planning Policy Framework (NPPF), Herefordshire Local Plan Core Strategy and Herefordshire Council Neighbourhood Planning Guidance Notes where references would support the inclusion of relevant policies. Similarly, reference is made to the Parish **Resident's Que**stionnaire that suggests that a matter is of concern.

18.3 One of the requirements is that policies meet what is called the 'Basic Conditions'. These are that it

- Has regard to national policies and advice contained in guidance issued by the Secretary of State;
 - Contributes to the achievement of sustainable development; and

- Is in general conformity with the strategic policies contained in the Development Plan for the area. In this regard, similar policies in other NDPs within the vicinity are referred to that have been accepted by examiners as having complied with this requirement.

- 2. Policy BR1: Promoting Sustainable Development
- 2.1 This policy sets out the basis for sustainable development within the Parish drawing together the three objectives identified in NPPF paragraph 8. It shows how the NDP meets the NPPF requirement to promote sustainable development. It is an overarching policy defining the strategy promoted within the NDP. It is useful in terms of informing decisions for developments that might come forward but are not covered in the NDP and also where material considerations suggest developments departing from the NDP might be considered exceptions.
- 2.2 This form of policy has been found to meet the basic conditions in a number of neighbourhood plans within the general area including Goodrich and Welsh Bicknor NDP² Peterstow NDP³ and Whitchurch and Ganarew NDP⁴ all of wh**ich have been 'made' and adopted by Herefordshire Council.**
- 3. Policy BR2: Development Strategy
- 3.1 This policy sets the context for where various forms of development should be located, in particular how housing should be distributed between settlements and outside of their development boundaries. In this

² <u>https://www.herefordshire.gov.uk/directory_record/3060/goodrich_and_welsh_bicknor_group_neighbourhood_development_plan</u>

³ <u>https://www.herefordshire.gov.uk/directory_record/3097/peterstow_neighbourhood_development_plan</u>

⁴ <u>https://www.herefordshire.gov.uk/directory_record/3120/whitchurch_and_ganarew_group_neighbourhood_development_plan</u>

regard it defines the approach required by Herefordshire Local Plan Core Strategy policy RA2 which indicates "*Neighbourhood Development Plans will allocate land for new housing or otherwise demonstrate delivery to provide levels of housing to meet the various targets, by indicating levels of suitable and available capacity*". The Parish contains two settlements named within Core Strategy Table 4.15 and consequently needs to define how the housing target should be accommodated between Bridstow and Wilton. Other forms of development covered by the Core Strategy and NPPF may arise within the Parish and how these might be accommodated in spatial terms is set out in the strategy.

- 3.2 This approach is similar to that pursued in Whitchurch and Ganarew NDP which was found to meet the basic conditions.
- 4. Policy BR3: Major Development within the Wye Valley AONB
- 4.1 This policy sets out the basis for determining planning applications that might affect the key elements of interest within that part of the Wye Valley AONB that covers the whole of the Parish. Although the first part duplicates the provisions of NPPF paragraph 172 which sets the context for defining what the NDP considers **to be 'major development' subsequent parts set out how 'major development' should be determined within the** parish. This has been informed by a number of appeal decisions. The ability for NDPs to do this has been confirmed through examinations undertaken for Goodrich and Welsh Bicknor NDP, Peterstow NDP and Whitchurch and Ganarew NDP. This policy is primarily for development management purposes setting out the criteria against which relevant proposals should be assessed
- 5. Policy BR4: Conserving the Landscape and Scenic Beauty within the Wye Valley AONB
- 5.1 Conserving the landscape is one of the matters that Herefordshire Council suggests might be covered in a neighbourhood development plan (see Herefordshire Council Neighbourhood Planning Guidance Note 23). The **policy refers to the landscape character areas described in Herefordshire Council's Landscape Character** Assessment which is referred to in that guidance note and the approach that is recommended within this for the two-character areas. It also covers a number of other elements important to the conservation of the **landscape, in particular tree cover, which is highlighted in Herefordshire Council's advice. These policy** complements paragraphs 170 172 of the NPPF and Herefordshire Local Plan Core Strategy LD1 through identifying those matters relevant to the Parish. This policy is primarily for development management purposes setting out the criteria against which relevant proposals should be assessed
- 5.2 This policy is consistent with the approaches adopted for other NDPs in the vicinity, in particular Goodrich and Welsh Bicknor NDP, Peterstow NDP and Whitchurch and Ganarew NDP. The defining of a strategic gap element of the policy (BR4[d]) is a mechanism used in other NDPs, of which as example can be found in Cradley NDP⁵.
- 6. Policy BR5: Protecting Heritage Assets
- 6.1 Again, this is a matter suggested for inclusion within Herefordshire Council's Neighbourhood Planning Guidance Note 23. The policy covers archaeological aspects, listed buildings, Ross-on-Wye Conservation Area and historic parks and gardens, all of which are matters highlighted in that note. Again, the policy is consistent with the NPPF and Herefordshire Local Plan Core Strategy LD4 through identifying those matters relevant to the Parish. It also refers to historic farmsteads which were identified through a local study facilitated by Historic England and these contribute towards the character of the AONB. Where not covered by a national designation these would form part of the Parish's locally important heritage assets which, in addition to other such assets, are afforded some protection in order accordance with NPPF paragraph 197. Consequently, this policy highlights the need for them to be considered. Some 90% of residents responding to the survey considered the impact of land use change on historic sites to be important (Question 4). This policy

⁵ Policy CNDP8 at <u>https://www.herefordshire.gov.uk/download/downloads/id/11048/neighbourhood_development_plan_may_2017.pdf</u>

is primarily for development management purposes setting out the criteria against which relevant proposals should be assessed

- 6.2 Again, this policy is consistent with the approaches adopted for other NDPs in the vicinity, in particular Goodrich and Welsh Bicknor NDP, Peterstow NDP and Whitchurch and Ganarew NDP.
- 7. Policy BR6: Enhancement of the Natural Environment
- 7.1 Again, this is a matter suggested for inclusion within Herefordshire Council's Neighbourhood Planning Guidance Note 23. Compliance with the NPPF is covered in the policy's supporting statement. It also complies with Herefordshire Local plan Core Strategy LD2. Additional biodiversity net-gain provisions are currently being considered by Government as part of its Environment Bill. Residents rated measures to protect and enhance the natural environment very high when asked in the Resident's Questionnaire (Questions 2 and 5) and 90% considered the impact of land use change on wildlife to be important. This policy is primarily for development management purposes setting out the criteria against which relevant proposals should be assessed
- 7.2 Again, this policy is consistent with the approaches adopted for other NDPs in the vicinity, in particular Goodrich and Welsh Bicknor NDP, Peterstow NDP and Whitchurch and Ganarew NDP.
- 8. Policy BR7: Protection from Flood Risk
- 8.1 Some 90% of residents considered the impact of water run-off to be an important factor in land-use change (Question 4). Herefordshire Council's Neighbourhood Planning Guidance Note 19 on Sustainable Water Management identifies flood risk as an issue relevant to NDPs. This reflects NPPF paragraphs 155 165 and Core Strategy policy SD3. The NPPF indicates that all plans should apply the sequential test. This has been done in relation to site assessments and the inclusion of a policy to cover this matter is so that developments coming forward through more general policies should also be subject to the relevant tests. The management of drainage in rural areas such as this Parish, is also a concern and biodiversity net gain benefits can be achieved through measures such as sustainable drainage schemes. This policy is primarily for development management purposes setting out the criteria against which relevant proposals should be assessed
- 8.2 Goodrich and Welsh Bicknor NDP and Whitchurch and Ganarew NDP contain examples of similar policies that have been found to comply with the basic conditions.
- 9. Policy BR8: Sewerage Infrastructure
- 9.1 Some 95% of residents responding to the questionnaire identified the need for adequate sewerage (Question 16). Again, Herefordshire Council's Neighbourhood Planning Guidance Note 19 on Sustainable Water Management covers this matter suggesting it is pertinent to a NDP. Wastewater drainage from settlements within the Parish flows to the Lower Cleeve (Ross-o-Wye) WwTWs and this has had capacity problems. Although it is understood these are being addressed, it may be necessary to phase development or seek contributions to support upgrading works. This is a precautionary policy, given that the outflow from the works flow into the River Wye which is a Special Area of Conservation and water quality must be maintained. This policy is primarily for development management purposes setting out the criteria against which relevant proposals should be assessed and consistent with Core Strategy policy SD4.
- 9.2 Examples of where similar policies have been found to meet the basic conditions in nearby locations can be found in Goodrich and Welsh Bicknor NDP, Peterstow NDP and Whitchurch and Ganarew NDP.

10. Policy BR9: Sustainable Design

10.1 Sustainable development must incorporate design elements that contribute towards mitigating climate change and where appropriate adapting to such change. Good design is promoted in NPPF section 12 and this policy

contributes to this objective, addressing those matters highlighted in Core Strategy policy SD1 which are most relevant to the Parish. This policy is primarily for development management purposes setting out the criteria against which relevant proposals should be assessed

- 10.2 Again, examples of where similar policies have been found to meet the basic conditions in nearby locations can be found in Goodrich and Welsh Bicknor NDP, Peterstow NDP and Whitchurch and Ganarew NDP.
- 11. Policy BR10: Housing Design and Appearance
- 11.1 Again this policy addresses issues promoted in NPPF section 12, in particular to support local matters set out in paragraph 127. Residents considered visual impact on surroundings and various amenity considerations to be important when there is a change in land-use (Question 4) This policy is primarily for development management purposes setting out the criteria against which relevant proposals should be assessed
- 11.2 Again, examples of where similar policies have been found to meet the basic conditions in nearby locations can be found in Goodrich and Welsh Bicknor NDP, Peterstow NDP and Whitchurch and Ganarew NDP.
- 12. Policy BR11: Traffic Measures within the Parish
- 12.1 Resident's Questionnaire question 24 confirmed concern about a number of road safety issues in locations within the Parish. Question 25 indicated measures that the community might support or oppose. Question 27 showed some support for the development of cycle paths within the Parish. Transport issues are legitimate matters to cover in a NDP and Herefordshire Council has issued a Neighbourhood Planning Guidance Note upon this (No 26). Herefordshire Local Plan Core Strategy policy SS4 states (among other matters): "Herefordshire Council will work with the Highways Agency, Network Rail, bus and train operators, developers and local communities to bring forward improvements to the local and strategic transport network to reduce congestion, improve air quality and road safety and offer greater transport choices, including the provision of the following major schemes:
 - ESG Link Road (safeguarded route) and Transport Hub;
 - Hereford Relief Road;
 - Leominster Relief Road;
 - Connect 2 Cycleway in Hereford;
 - Park and Choose schemes; and
 - other schemes identified in the Local Transport Plan and Infrastructure Delivery Plan."
- 12.2 This policy reciprocates the Core Strategy policy from the perspective of the local community, in that the Parish Council is its representative body. Transport issues are a matter of significant concern within the Parish given it is crossed by two trunk roads and there are major concerns about the safety of other roads, including the absence of footpaths on the local network. The policy identifies those matters that the community wishes to see addressed within such discussions and included in reviews of the Infrastructure Delivery Plan and other mechanisms to take advantage, where possible, of the Local Sustainable Transport Fund as well as other funding sources, including from developers.
- 12.3 **The suggested amendments to policies and statements in the NDP recommended by Herefordshire Council's** Transport section are a useful reflection of the way the two parties might work together through this policy (see in particular NDP paragraph 7.3).
- 12.4 Goodrich and Welsh Bicknor NDP contains aa similar policy that has met the basic conditions.
- 13. Policy BR12: Highway Design Requirements

- 13.1 Suitable road access and highway capacity were identified by residents as important (Question 16). Some 93% or residents considered impact on road traffic to be a factor when determining land use change (Question 4). This is a design policy which complements policies BR9 and BRE10 covering those matters necessary to accommodate development safely upon the highway network while maintaining its character. In particular it covers matters identified in NPPF paragraph 108 b) and c) and those matters highlighted in Core Strategy MT1 that are relevant to the Parish. This policy is primarily for development management purposes setting out the criteria against which relevant proposals should be assessed.
- 13.2 Examples of where similar policies have been found to meet the basic conditions in nearby locations can be found in Goodrich and Welsh Bicknor NDP, Peterstow NDP and Whitchurch and Ganarew NDP.
- 14. Policy BR18: Agricultural Diversification, Tourism and other Employment Enterprises
- 14.1 NPPF paragraphs 83 and 84 indicate that plans can contain policies to support a prosperous rural economy, including all the aspects identified in this NDP policy. It also complements Core Strategy policy RA6 which also contains criteria listed in other policies within this NDP. This policy is primarily for development management purposes setting out the criteria against which relevant proposals should be assessed.
- 14.2 There is a similar policy in Goodrich and Welsh Bicknor NDP that has been found to meet the Basic Conditions.
- 15. Policy BR19: Renewable and Low Carbon Energy
- 15.1 Residents supported some forms of renewable energy although not all (Question 6). Herefordshire Council Neighbourhood Planning Guidance Note 25 provides advice upon renewable energy and indicates that it is a matter that might be included within this NDP. This policy is primarily for development management purposes setting out the criteria against which relevant proposals should be assessed. It complements Core Strategy policy SD2 and is included to ensure many of the criteria referred to can be cross-referenced to more detailed policies elsewhere in the NDP. NPPF paragraph 151 indicates that plans should set out a positive strategy for energy from such sources. This policy acts positively by defining the type of proposal that should be encouraged in terms of scale, being individual or community-based proposals, in particular being consistent with the aims of the AONB. The whole of the Parish falls within the Wye Valley AONB so larger scale proposals would be likely to fall under the description of major development.
- 15.2 Examples of where similar policies have been found to meet the basic conditions in nearby locations can be found in Peterstow NDP and Whitchurch and Ganarew NDP.
- 16. Policy BR20: Polytunnel Proposals
- 16.1 Polytunnel developments have and remain a high-profile issue within the County and has been identified as such from the Resident's Questionnaire undertaken during the preparation of the NDP (Question 7). Herefordshire Council had produced a Supplementary Planning Document to provide guidance on this form of development. However, its use appears to have been reduced more recently since the adoption of the Core Strategy. The matter is very pertinent given the Parish's location within the Wye Valley AONB. This policy is primarily for development management purposes setting out the criteria against which relevant proposals should be assessed.
- 16.2 Examples of where similar policies have been found to meet the basic conditions in nearby locations can be found in Peterstow NDP and Whitchurch and Ganarew NDP.
- 17. Policy BR21: Protection and Enhancement of Community Facilities
- 17.1 Herefordshire Council Neighbourhood Planning Guidance Note 25 provides advice upon Community Facilities indicating that it is a matter that might be included within this NDP. This specifically refers to the need to protect such facilities where possible consistent with NPPF paragraph 92 and Core Strategy policy SC1.

Surveys of local youth identified certain needs and proposals that might come forward from whatever source to enable these is to be welcomed and supported. This policy provides encouragement in the event that this occurs, however unlikely.

- 17.2 Examples of where similar policies have been found to meet the basic conditions in nearby locations can be found in Goodrich and Welsh Bicknor NDP, Peterstow NDP and Whitchurch and Ganarew NDP.
- 18. Policy BR22: Protection of Local Green Space and Areas of Open Space
- 18.1 NPPF paragraph 97 protects open space and paragraph 99 enables local communities to identify and protect areas of particular importance to them and for these to be included in neighbourhood plans where relevant. Herefordshire Local Plan Core Strategy also seeks to protect open space through its policy OS3. Advice upon such areas is provided in Herefordshire Council Neighbourhood Planning Guidance Note 24. This policy defines those areas that should be protected in accordance with those provisions.
- 18.2 Examples of where similar policies have been found to meet the basic conditions in nearby locations can be found in Goodrich and Welsh Bicknor NDP and Peterstow NDP.
- 19. Policy BR23: Contributions to Community Services, Youth Provision and Recreation Facilities
- 19.1 Herefordshire Council has yet to introduce a scheme to enable Community Infrastructure Levy payments. If and when it comes into operation, local communities will be able to receive a higher level of payment when they have a neighbourhood plan. Herefordshire Council Neighbourhood Planning Note 27 covers this issue, and it is therefore legitimate to consider this matter in the event that such a scheme comes into operation. Currently Herefordshire Council achieves payments towards important services utilising payments made under Section 106 of the Town and Country Planning Act 1990 (as amended). This provides for payments towards community services, children and young people, and open space/recreation (among others). These three measures/facilities can be provided by parish councils and a number of relevant specific needs have been identified through the neighbourhood plan consultations. However, currently such payments are not sought for small housing schemes although this was previously the case. Other forms of development can contribute towards open/recreational space. Although it is acknowledged that such payments are unlikely at present, the situation may change, and the Parish Council may wish to take advantage of such payments in such an event.
- 19.2 Examples of where similar policies have been found to meet the basic conditions in nearby locations can be found in Goodrich and Welsh Bicknor NDP, Peterstow NDP and Whitchurch and Ganarew NDP.
- 20. Policy BR24: High Speed Broadband and Telecommunications
- 20.1 Herefordshire Council Neighbourhood Planning Guidance Note 37 covers the issue of broadband, citing the example of Leintwardine NDP as an example. That policy example in Leintwardine NDP is similar to that in this **NDP. Section 10 of the NPPF promotes supporting high quality communications. The Resident's Questionnaire** showed a mixed response in relation to broadband and mobile telephone reception, with small majorities considering them to be adequate (Question 28).
- 20.2 Other examples of where similar policies have been found to meet the basic conditions in nearby locations can be found in Goodrich and Welsh Bicknor NDP and Whitchurch and Ganarew NDP.

Section 4

Bridstow Parish Neighbourhood Development Plan

Schedule 2

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

November 2020

(NB minor typographical and grammatical changes are not listed)

Bridstow Neighbourhood Development Plan Changes to Draft Plan Following Regulation 14

Change Ref No	Draft Plan Section/reference	Proposed Change	Reason
1	Plan Title page	Amend to read 'Bridstow Neighbourhood Development Plan 2011– 2031 Submission Draft –	To indicate the
		(with the appropriate date when approved by the Parish Council)	period covered by
			the plan.
2	Footer	Amend to read: <u>'Bridstow Neighbourhood Development Plan 2011 - 2031 Submission Draft – (with</u>	To reflect the
		the appropriate date when approved by the Parish Council)'	updated version.
3	Reg 14 Notice	Delete Notice	No longer required
			– Plan has
			progressed past
			this stage.
4	Figure 1, page 4	Replace figure with one that shows the stage the plan will have reached when next published	To update the
			figure.
5	New Paragraph	Insert new paragraph to read:	To set out the
	1.7		approach to
		Both Herefordshire Council and the Parish Council acknowledge the challenging nature of meeting	monitoring
		the required level of proportional housing growth, in particular in view of constraints arising from	housing provision
		highway safety and capacity. The need for detailed traffic impact assessments for most if not all	given the
		allocated housing sites is evident, although it is most appropriate for these to be prepared at the	uncertainty in
		planning application stage. This suggests there is a high level of uncertainty in the ability to deliver	terms of ability to
		all the sites proposed. This may have wider implications for any future rural housing strategy. As a	meet housing
		consequence, the two Councils need to work together to monitor the ability of the Parish to	growth
		accommodate housing development. The following approach is proposed as a partnership	requirements as a
		between the two councils to determine whether decisions on planning applications indicate local	consequence of
		conditions are able to deliver what is proposed:	the parish's
			location in relation
		1. To review the trend in the delivery of the anticipated windfall allowances on a regular basis.	to the Strategic
		2. To monitor refusals of planning permission, especially on the grounds that a traffic impact	Highway Network
		assessment indicates a proposed site cannot be developed in principle or at excessive costs in	
		terms of providing satisfactory highway safety mitigation measures.	
		Where this monitoring suggests that the approach adopted in the NDP is unable to deliver	
		sufficient dwellings to meet the required level of proportional housing growth, the two parties	

		should agree whether a review of the NDP is required or that the rural housing strategy set out in the Core Strategy, so far as it relates to Bridstow Parish, is not appropriate and should inform the review of the Core Strategy.	
6	Paragraph 2.5	Add at end of final sentence ' <u>or public transport'</u> .	To respond positively to advice in a representation
7	Paragraph 2.6	Delete second sentence	The reference is unnecessary
8	Paragraph 2.22	Amend 6 th sentence to read: In terms of the impact development may have on this landscape type, the hedgerow pattern, which is the most significant feature of this landscape, and tree cover should be retained <u>and</u> strengthened although not through the planting of new woodlands.	To respond positively to advice from the Wye valley AONB Officer
9	Paragraph 3.20	 Add additional bullet point: Increasing vehicle and pedestrian safety at the road narrowing on the C1261 by Rock Cottage. 	To reflect comments by Herefordshire Council and the concerns of local residents
10	Paragraph 3.25	Amend 2 nd sentence to read: 'Between 2011 and January 2019, <u>20</u> dwellings were either granted planning permission or built leaving provision to be made for a minimum of <u>37</u> dwellings.'	To update the figures to reflect the granting of planning permission for 2 dwellings under code P191034/F
11	Paragraph 3.26	Amend the paragraph to read: <u>The Meeting Housing Needs and Site Assessments Report analysed delivery rates for small sites</u> <u>both within settlements and the Parish's rural area</u> suggesting an allowance for windfall development amounting to a further 12 dwellings would be reasonable; 9 within settlement boundaries and 3 within the rural area. <u>Since that report was prepared 2 of the dwellings identified</u> <u>as potential small sites within a settlement have been granted planning permission.</u>	To update the paragraph in the light of a further planning permissions
12	Paragraph 4.2, Objective 1	In 1 d) change 'wildlife' to 'biodiversity'	The accept a suggestion from a representation

13	Paragraph 4.2 Objective 2	 Amend parts b) and c) to read b) Avoiding development where there may be <u>significant</u> danger resulting from <u>contact with</u> vehicles. c) Pressing for <u>further</u> measures to increase the safety of pedestrians, cyclists and people with mobility problems crossing the A40. 	 b) To respond positively to representations c) Some measures have been undertaken and the change reflects the need for further improvements.
14	Paragraph 4.2 Objective 3	 Amend the introduction to the objective the read: 'To ensure the network for walking and cycling is effective, increasing accessibility through these means where possible. The practical measures should include, but not be limited to:' Add a third element to the objective to read: c) protecting the line of former railway against development to support the development of active travel (walking and cycling) routes. 	To accept a useful suggestion. To respond positively to advice from Herefordshire Council
15	Paragraph 4.2 Objective 4	 Amend element c) to read: a) Ensuring analysis of landscape settings and features, heritage assets, local distinctiveness, community needs and the effects of pollution (including noise, air quality and light) are key to the design and development of any housing schemes. 	To respond positively to advice from Herefordshire Council
16	Policy BR1	 Amend the second sentence to the introductory statement to read: <u>'Development</u> proposals should address the following high-level priorities that are considered essential by the local community for maintaining sustainable development:' Amend the first criterion in the policy to read: 'The highest priority will be given to protecting the landscape of the Wye Valley Area of Outstanding Natural Beauty, its character, its important natural and historic features, and the settings of those settlements that sit within it, in particular to conserve or enhance those Special Qualities identified in the Wye Valley AONB Management Plan. Major development should only be permitted in exceptional circumstances where it can be demonstrated that it is in the public 	To respond to advice from Herefordshire Council To better reflect national policy and be consistent with similar policies approved for other NDPs within the Wye Valley AONB.

		interest, no viable alternative sites are available to accommodate this development elsewhere,	
		and its environmental effects can be mitigated to a satisfactory degree.'	
17	Paragraph 5.6	Amend the third sentence to read:	To respond to advice from the
		'Regard should be had at all times to the conservation and enhancement of the special qualities	Wye Valley AONB
		identified in the Wye Valley AONB Management Plan.	Officer
18	Policy BR4	Amend the introductory sentence to the policy to read:	To improve clarity
		⁴ <u>All</u> development proposals, <u>including those</u> which are acceptable in principle in terms of Policy BR3, should:	
19	Paragraph 6.3	Amend first sentence to read:	To respond to advice from the
		'Where development does not amount to 'major development' and is generally acceptable, there	Wye Valley AONB
		is still a need for sites to <u>conserve and enhance the AONB including</u> the settings of settlements and the wider rural landscape.'	Officer
20	Paragraph 6.4	Delete final sentence and revised to read:	To respond to advice from the
		'The character of the Wye Valley AONB within the Parish varies between two-character areas and some of their characteristics and features are highlighted in paragraph 2.22 of this Plan. In addition to the considerations in this policy and Herefordshire Local Plan Core Strategy policy LD1, there is guidance included in Herefordshire Landscape Character Assessment Supplementary Planning Document that needs to be taken into account <u>as well as in the Wye Valley AONB Management Plan</u> . Furthermore, measures should be taken, where appropriate, to enhance the landscape.	Wye Valley AONB Officer
		Opportunities should always be looked for. This can be done through requiring detailed landscaping schemes <u>that carefully consider cumulative impacts of development on the landscape</u> . Herefordshire Local Plan Core Strategy Policy LD1 also specifically refers to the need to enable appropriate uses and management.	
21	Paragraph 6.5	Change 'Ancient Scheduled Monument to read 'Scheduled Ancient Monument'.	To correct terminology
22	Policy BR6	In final sentence, replace 'no net loss of' with ' <u>a net gain in'</u>	To reflect expecte changes to seek net gains in biodiversity withir

			or associated with development.
23	Paragraph 6.7	Change first sentence to read 'Wildlife is acknowledged as an important contributor to the character, scenic beauty <u>and special qualities</u> of the Wye Valley AONB.	To respond to advice from the Wye Valley AONB Officer
24	Policy BR9	Change criterion c) to read: With regard to housing development <u>ensuring</u> the new homes are fully integrated into the existing neighbourhood <u>through the design of supporting infrastructure that will encourage active travel,</u> <u>supporting</u> a more pedestrian friendly environment through convenient links to local facilities and public transport connections, <u>including provision</u> suitable for those pushing pushchairs, in wheelchairs, walking with aids or using mobility scooters; In criterion d) replace 'sustainable' with 'active'	To respond to advice by Herefordshire Council
25	Paragraph 6.11	Add at the end of the paragraph: ' <u>Where proposals involve significant development or will have</u> implications on the highway, a construction management plan should be provided.'	To respond to advice by Herefordshire Council
26	Policy BR10	Add at the end of criterion c): ' and that the amenity of future residents is not adversely affected by commercial or industrial activity'	To respond to advice by Herefordshire Council
27	Policy BR11	Redraft Policy to read: *Bridstow Parish Council will work with the Highways England, Herefordshire Council and developers to introduce measures to improve the road network road, to ensure greater safety, increase transport choices and reduce the impact of vehicles resulting from development upon its residents. Where discussions are undertaken upon development proposals, positive measures should address the following issues, where appropriate: a) Facilitating safer parking adjacent to Bridstow Primary School. b) Reducing the traffic effects of any proposed development upon village and residential amenity.	To respond to advice by Herefordshire Council and concerns in other representations

 In addition, it remains a long-term aspiration by Herefordshire Council, following a accordance with feasibility study and subject to funding being available, to form part of National Cycle Network route 44 between Hereford and Ross-on-Wye, and provide an alternative policy SS4. 		1		
d) Delivering local improvements to improve road safety, especially at the entrances to settlements within the Parish, at the narrow section of the C1261 by Rock Cottage, and where there are safety problems at junctions onto the major routes. Proposals will be introduced progressively during the Plan period in association with the Highways England and Herefordshire Council and include utilising developer contributions resulting from development within the Plan area.' To indicate the support that 'Highways England, which is responsible for the Strategic Road Network considers the approach set out in this policy to be a suitable way of addressing highway issues.' To indicate the support that 'Highways England, which is responsible for the Strategic Road Network considers the approach set out in this policy to be a suitable way of addressing highway issues.' To indicate the support that 'Highways England has given to Policy BR11. 29 New Paragraph Insert new paragraph (as 7.3 – renumbering subsequent paragraphs): 'Herefordshire Council has identified a number of measures that might be advanced through discussions in accordance with this policy and its Local Plan Core Strategy policy SS4: Transportation section has given to access the crossing from Wilton Bridge. Neurol's Transportation section has given to this policy and its Local Plan Core Strategy policy SS4. 0 In addition, it remains a long-term aspiration by Herefordshire Council, following a feasibility study and subject to funding being available, to form part of National Cycle Network route 44 between Hereford and Ross-on-Wye, and provide an alternative			including the Public Rights of Way network, to serve the community and to provide	
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 Although there is now a cycle lane leading to and from the toucan crossing over the A40 north eastern arm of Wilton Roundabout, it is difficult for cyclists leaving Ross-on-Wye to this policy and to access the crossing from Wilton Bridge. In addition, it remains a long-term aspiration by Herefordshire Council, following a feasibility study and subject to funding being available, to form part of National Cycle Network route 44 between Hereford and Ross-on-Wye, and provide an alternative policy SS4. 			discussions in accordance with this policy and its Local Plan Core Strategy policy SS4:	Council's
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feasibility study and subject to funding being available, to form part of National CycleCore StrategyNetwork route 44 between Hereford and Ross-on-Wye, and provide an alternativepolicy SS4.				suggested in
Network route 44 between Hereford and Ross-on-Wye, and provide an alternative policy SS4.				accordance with
				Core Strategy
			Network route 44 between Hereford and Ross-on-Wye, and provide an alternative	policy SS4.
walking and cycling route between the parish and Ross-on-Wye by re-decking Backney			walking and cycling route between the parish and Ross-on-Wye by re-decking Backney	
Bridge to provide a walking and cycling route to Ross Rugby Club. Although only a very			Bridge to provide a walking and cycling route to Ross Rugby Club. Although only a very	
small part of the route runs through the Parish.			small part of the route runs through the Parish.	
Crossing facilities would enable the walking and cycling network to be extended - with			Crossing facilities would enable the walking and cycling network to be extended - with	
particular crossing provision over the A49 to Bridstow Primary School from Bannuttree				
Lane.				

		 Opportunities to improve the Public Rights of Way network in order to promote healthy lifestyles is a further positive measure that may be achieved where possible through development.' 	
30	Policy BR12	Amend policy to read:	To reflect advice given by
		'Where development proposals are advanced, these should ensure:	Herefordshire Council and
		a) There is safe access onto the adjacent roads and at associated junctions.	Highways England.
		b) Proposals will not result in on-street parking but provide adequate off-street parking for residents and visitors, and if possible, address the reduction of any on-street parking problems that may exist within the vicinity.	
		c) Proposals will not lead to a significant increase in the volume of traffic travelling through villages within the Parish or on roads that do not have sufficient capacity.	
		d) The nature of the development does not lead to pressure for the provision of street lighting where this is not currently present within the area concerned.	
		e) Better access to and support for more use of public transport, new cycling and walking	
		links to serve the community and to provide safer routes to Bridstow Primary School.	
		Where appropriate, this should include provision for cycle parking/storage and associated facilities.	
		Where necessary, transport assessments will be required in order to assess the impacts of	
		development on the highway and any mitigation that may be required. Developments should be capable of meeting the appropriate highways standards on land owned or controlled by the	
		applicant or on highway land.	
31	Paragraph 7.4	Amend paragraph to read:	To reflect advice
	(new number)		given by
		'With the need to accommodate further development, it is essential that the highway	Herefordshire
		requirements in terms of safety are met in order that the network can cope with increases in traffic	Council and
		generated. This applies not only in the settlements where growth is proposed but also elsewhere in	Highways England.
		the Parish. It is also important that local amenity is protected from the impact of traffic. In order to	
		ensure that development can be accommodated upon the highway network in the most appropriate manner transport assessments or statements may be required. This will be the case	

		where new accesses are proposed onto the highway.Herefordshire Council's Design Guide for NewDevelopments sets outappropriate highway standards to ensure the network can accommodatenew development and this policy supports their use outlining important issues that should beaddressed as part of any planning application where traffic is generated. Tranquillity within theParish is also something that residents appreciate and the absence of street lighting in much of theParish is a contributory factor to this. The design and layout of any new development should avoidthe need for street lighting where this is not currently present. This policy does not restrictimprovements where there is an overriding safety requirement for this. Herefordshire Council has	
		asked that the NDP supports public transport and active travel, which would include provision of facilities for cyclists would promote cycling and active travel.'	
32	Paragraph 8.1	At the end of the paragraph, delete 'Appendix 2' and insert link to the Parish council's website where the report on the assessment of potential sites should be found.	The report on the assessment of sites was provided at the Regulation 14 stage so that all stakeholders would be aware of the approach taken. It does not form part of the plan and has been removed in order to avoid confusion over its status.
33	Paragraph 8.2	Replace 'A44' by ' <u>A40</u> ' in the second sentence.	To correct an error.
34	Policy BR13	Delete in first line of policy 'and on a small site identified for development shown on Wilton Village Policies Map'	The site has been deleted from the draft plan in accordance with advice from Herefordshire Council
35	Paragraph 8.4	Amend paragraph to read: 'There was no settlement boundary shown previously for Wilton in Herefordshire Unitary Development Plan although one was defined in an earlier Local Plan. Given the support expressed	To explain why the site has been deleted but that the land concerned

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		by the community for defining settlement boundaries, it is proposed this approach should be adopted for Wilton in the NDP. The new boundary is based upon the previous boundary. <u>This has</u> been extended to include an area to the north of Wilton Cottages which was initially suggested as a potential housing site. However, significant concerns were expressed by Herefordshire Council in terms of road traffic noise impacts that should not be ignored. Nevertheless, a suitable alternative use should be encouraged. It is considered to be previously developed land, having been used for a number of purposes over time, and has in the past received planning permission for use as a restaurant and associated car parking. The barn at the northern end of the site figured substantially in that proposal and is an important local heritage asset. It falls within Ross-on-Wye Conservation Area which is considered by Historic England to be 'at risk'. Its redevelopment has	remains within the extended settlement boundary in order to encourage a suitable and sensitive development that would enhance the conservation area.
		the potential to enhance the Conservation Area if carried out in an appropriate manner with a suitable use.'	
		Move remainder of that paragraph to form a new paragraph after paragraph 8.4	
36	Policy BR14 and associated paragraph 8.7	Delete the policy and supporting paragraph.	The site has been deleted from the draft plan in accordance with an objection from Herefordshire Council.
37	Policy BR15	In the second sentence delete 'settlement'	To be consistent with the approach defining a number of development boundaries for the settlement of Bridstow
38	Paragraph 8.11 (New 8.10)	Add after St Bridget's Church, ' <u>an area extending down towards Whitecross Farm as a consequence</u> of a planning permission that has been granted and <u>two</u> housing allocations.'	To clarify the reason for the boundary defined for the Bannuttree area of Bridstow.
39	Policy BR16 (New BR15)	Delete:	The site has been deleted from the
		iii) land amounting to 0.16 hectares at Whitecross, Bannuttree	draft plan in

40	Paragraph 8.16 (New 8.15)	Amend '6 sites' to ' <u>5 sites'</u> and 'minimum of 32 dwellings' to ' <u>minimum of 29 dwellings'</u>	accordance with an objection from Herefordshire Council. To reflect the deletion of the site referred to above.
41	Paragraph 8.18	 Revise and add to the bullet point list to read as follows: A low-rise, low-density development, preferably of bungalows, would protect the residential amenity of neighbouring properties and be expected to generate limited traffic at peak hours. <u>To comply with policy BR10(c)</u>, a noise assessment should inform layout and housing design to minimise the effect of noise from the A40 upon dwellings. A high-quality landscape scheme would ensure the development fits sensitively into the settlement and protect views from important vantage points in Rosson-Wye in accordance with policy BR4. <u>A transport assessment will be required in accordance with policy BR12 to assess the impacts of development on the highway and mitigation be identified if required.</u> The development should be served by an access road to meet Herefordshire Council's Highways Design Guide for New Developments. A contribution of up to 8 dwellings towards the required level of proportional growth is expected from the development of this site.' 	To emphasise those other NDP policies that are important to the development of the site in question.
42	Paragraph 8.19	 Revise and add to the bullet point list to read as follows: The setting of the Old Vicarage should be protected through the defining of an appropriate area within which the built-form should take place and the design of a high-quality landscape scheme <u>in accordance with policies BR4(f) and BR5(c)</u>. The form of development is important and might usefully take a courtyard form reflecting a stabling or similar complex associated with the Vicarage. It should 	To emphasise those other NDP policies that are important to the development of the site in question.

		 be informed by a Heritage Impact Assessment that should include reference to views from The Prospect in Ross-on-Wye in accordance with policy BR10(b). The development should be served by a private drive to meet Herefordshire Council's <u>Highways Design Guide for New Developments.</u> <u>A transport assessment will be required in accordance with policy BR12 to assess the impacts of development on the highway and to identify any mitigation that may be required.</u> A contribution of 5 dwellings towards the required level of proportional growth is expected from the development of this site. 	
43	Paragraph 8.20	Delete whole of paragraph 8.20	A consequent action from the deletion of the site at Whitecross.
44	Paragraph 8.21	 Revise and add to the bullet point list to read as follows: The amenity of adjacent dwellings to the east and south should be protected in accordance with policy BR10(c). A high-quality landscape design should be prepared and implemented in accordance with policy BR4, and trees protect by the use of Tree Preservation Orders where appropriate. The development should be served by a private drive to meet Herefordshire Council's Highways Design Guide for New Developments. A transport assessment will be required in accordance with policy BR12 to assess the impacts of development on the highway and identify any mitigation that may be required. It should assess, in particular, the level of any impact, on the narrow section of highway by Rock Cottage. The provisions of policy BR17 in relation to the area of special character at Buckcastle Hill will apply to this site. 	To emphasise those other NDP policies that are important to the development of the site in question.

		• A contribution of 5 dwellings towards the required level of proportional growth	
		is expected from the development of this site.	
45	Paragraph 8.22	 Revise and add to the bullet point list to read as follows: The amenity of adjacent dwelling to the west of the site should be protected in accordance with policy BR10(c). The site should be developed at a low density. A high-quality landscape design should be prepared and implemented for the whole site in accordance with policy BR4. The development should be served by a private drive to meet Herefordshire Council's Highways Design Guide for New Developments. A transport assessment will be required in accordance with policy BR12 to assess the impacts of development on the highway and mitigation be identified if required. It should show, in particular, that any impact, on the narrow section of highway by Rock Cottage, including after any mitigation measures, will not be classed as severe. Measures may be required to protect land further to the east on the opposite side of the existing track from development. 	To emphasise those other NDP policies that are important to the development of the site in question.
		 A minimum contribution of 3 dwellings towards the required level of proportional growth is expected from the development of this site. 	
46	8.23	Amend the last sentence in the paragraph and revise and add to the bullet point list to read as follows: Specific measures will be required to address the effect upon the landscape <u>and the character and setting of the settlement, in accordance with policy BR4, and other considerations as follows:</u>	To emphasise those other NDP policies that are important to the development of the site in question.

 The north-western edge should comprise an irregular rural boundary as opposed to a hard-urban edge and reflect the parkland character approach adopted for the site at Littlefields (<u>planning permission code P181237</u>). A block of structural tree planting should be provided upon part of its north-western edge to mitigate the effects of development on views from the north. Again, to reflect the parkland approach, a 'looser' form of development should be provided on the western sides of the site than within that to the east. A signature building reflecting a gatehouse should be provided at the entrance to the development. Further significant planting should be provided elsewhere within the site. Buffers should be provided along its southern and eastern edges to protect the residential amenity of neighbouring properties. A transport assessment will be required in accordance with policy BR12 to assess the impacts of development on the highway and mitigation be identified if required. It should show, in particular, that any impact, on the narrow section of highway by Rock Cottage, including after any mitigation measures, will not be classed as severe. The possibility of creating a more direct link between PROW BW15 and BW16 should be explored in accordance with Policy BR11(e). The amenity of adjacent dwelling to the west of the site should be protected in accordance with policy BR10(c). The developed area should not exceed 1 hectare and a contribution of some 8 dwellings to wards the required level of proportional growth is expected from the development of this site. 	o emphasise that
'Depending upon the circumstances at the time of any planning application within this area, a Po	olicy BR12 may be nportant to the

48	Paragraph 8.27	 (NB paragraph numbers were duplicated in the Regulation 14 draft and have been corrected). Add at the end of the first sentence: 'Consultation responses from the two highway authorities suggest there is some uncertainty about the proposed housing sites. The NDP seeks to reduce this level of uncertainty through: Taking into account recent evidence through decisions upon planning applications and appeal decisions that suggest by advocating small sites spread across its various settlement areas, the ability to accommodate the resulting traffic is improved. Also taking into account modest amounts of potential windfall sites, in particular through policy BR17. Agreeing a Memorandum of Understanding with Ross-on-Wye Town Council to utilise 15 dwellings of its housing overprovision. Acknowledging that some of the housing sites may be able to accommodate more houses than that suggested subject to satisfactory traffic impact assessments. As a consequence, the NDP provides the potential for some 50% more houses above the required level of proportional housing growth, allowing greater flexibility in the event that some of the allocated sites might not be capable of delivery within the plan period. Monitoring processes will also be put in place that could lead to an expedited review of the NDP if necessary (see paragraph 11.6).	development of land through the policy in question. To indicate how the Parish Council has sought to reduce the level of uncertainty in view of highway constraints and which also involves a process of monitoring and review.
49	Table 1	Update Table 1 to take into account Herefordshire Council's revised figures for 2011-2019, a recently granted planning permission for 2 dwellings, the deletion of two sites following objections by Herefordshire Council, and to include the contingency provided by the Memorandum of Understanding with Ross-on-Wye Town Council.	To update figures and include additional evidence in the table.
50	Paragraph 9.7	Amend the final sentence to read: ' <u>Should such proposals be advanced a</u> properly evidenced case should <u>be made</u> on the basis that economic and other public benefits would be provided and <u>also</u> that provision cannot be met elsewhere outside of the AONB.'	To respond to advice from the Wye Valley AONB Officer

51	Paragraph 10.2	Amend the second sentence to read:	To respond
			positively to a
		'The need for further provision cannot be discounted, especially to provide facilities for youth	representation
		within the Parish, identified through the Youth Forum, with a play area having the highest priority.	
52	Paragraph 11.6	Revise to read:	To emphasise the
			importance of
		It is anticipated that a review of the NDP will be needed, most likely when Herefordshire Core	monitoring and
		Strategy is also reviewed. <u>However, as indicated in paragraph 1.7</u> , in the <u>event</u> that the strategy	reviewing the NDP.
		and approach in relation to housing does not deliver the level of housing required to meet the	
		target for the Parish, discussions will <u>need to</u> take place with Herefordshire Council upon whether	
		an early review is necessary or conditions are such that the Parish will not be able to meet the	
		proportional growth requirements.	
53	Maps 2, 3, 4 and 5	Replace these Policies Maps with maps prepared by Herefordshire Council in its house style and	Herefordshire
		correct notation panel for Map 5 and other matters for consistency with Herefordshire Council's	Council wishes to
		house style. Remove housing site allocations opposite Wilton Cottages and at Whitecross.	see a consistency
			in approach for
			policies maps
			across its area. To
			reflect changes in
			housing site
			allocations
54	Appendix 2	Delete Appendix 2 and relocate as a separate report upon the Parish Council website as part of the	The report on the
		evidence base.	assessment of sites
			was provided at
			the Regulation 14
			stage so that all
			stakeholders
			would be aware of
			the approach
			taken. It does not
			form part of the
			plan and has been
			removed in order
			to avoid confusion
			over its status.