

Walford Parish Neighbourhood Development Plan

Schedule 1

Schedule of Representations in response to Draft Neighbourhood Development Plan, March 2022

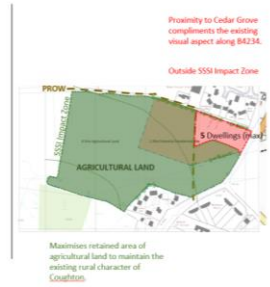
Walford Parish Council considered representations made upon the draft Neighbourhood Development Plan (NDP) following consultation with stakeholders undertaken at the Regulation 14 stage at its meeting on **XXXXXXX 2022**. The schedule below summarises the representations received, considers the issues 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. Where a change number is referred to under the 'Response to representation' column, this is shown in Schedule 2

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

NOTE

A significant number of representations relate to the Environmental Report and Appropriate Assessment. These documents have been prepared on the Parish Council's behalf by Herefordshire Council. Hence the response suggested is that they be forwarded to Herefordshire Council for it to review and revise the documents accordingly. They are identified in this document in lighter colours.

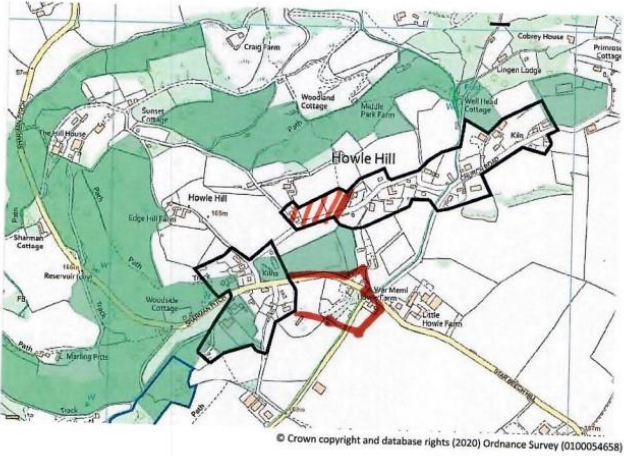
Schedule 1: Community Representations and Responses

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommends or seeks change/etc.	Representation (normal script) Parish Council Consideration (bold blue script)	Response to representation
C.1	Policy WALF21 (Para 7.18)	Seeks change	We have followed with great interest, the steering committee's emerging assessment of the many sites offered for the development plan for Walford. We note that the Regulation 14 Consultation Draft Plan has omitted Site 11. This was the only report that has excluded Site 11 and we believe there has been an assumption that the land was only suitable for a large development. This is not the case. A small development can be proposed for this site. Site 11 is ideally located almost opposite Walford Primary School with direct access to the benefits of the B4234. All previous issues of the steering committee reports assessed Site 11 to be the top ranked site for potential residential development. The owners have never had a target number of houses that should be developed on our site. Our proposals have always responded to the process managed by the steering group. Their initial offer has been reduced from a large site, with up to 40 homes, down to a medium site, with up to 19 homes. <i>The landowners are now happy to reduce their proposal down to a small site with up to 5 homes, as indicated on the indicative layout attached.</i> This layout can be adjusted to suit any additional requirements from the steering committee. Please could you therefore include Site 11 as one the acceptable small sites within the Walford Neighbourhood Plan, as Site 11 has already been assessed as the highest-ranking site in all previous assessments for developments in Walford. A corresponding reduction in the number of windfall sites would allow for this adjustment. SITE 11R3 - PROPOSAL PROPOSE A SMALL SIZED DEVELOPMENT OF 5 DWELLINGS WITH POTENTIAL FOR MEETING FUTURE HOUSING TARGETS  SITE 11R3 could be limited to no more than 5 dwellings as indicated in the adjacent sketches. Avoids SS9 Impact Zone around Cauldston Marsh Wood. Public right of way (PROW) retains the open aspect with agricultural views to the west. Adjacent to existing settlement boundary Maintains a visual gap characteristic between the northern and central clusters of the settlement. There is an opportunity for an allocation of allotments to the south, encompassed by the PROW and the main road. Planning Condition could encourage a sustainable development, including allowance for affordable housing. Structural landscaping buffers can be incorporated along the western and southern boundaries, to provide controlled and natural screening from the B4234 and from the PROW. 	See Changes No 34 and 35

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			The initial submission for this site comprised 6.3 hectares. A revised submission by the landowner amounted to 2.5 hectares. Analysis through the Meeting Housing Needs and Site Assessment Report identified an area of around 2 hectares that might be suitable. The site owner, in acknowledging the community's concerns, then submitted a further revision amounting to just under 1 hectare for no more than 19 dwellings (see Addendum 3 Report to the Meeting Housing Needs and Site Assessment Report). Concerns were expressed about the scale of development for all options including the 1-hectare site, and all raised had significant public opposition during a previous public consultation. The representation is for a smaller site to provide for up to 5 homes to be considered. The representation indicates there is potential for meeting future housing targets, presumably in the event that the Core Strategy review indicates a further requirement, and the site configuration reflects the ability to expand beyond the site now submitted. This site lies immediately adjacent to the existing built-up area of the settlement. A variation on the original site submission (i.e. the 2 hectare site) was assessed as meeting the suitability criteria as did the 1 hectare submission. However, both reduced sites were rejected on the basis that the option of utilising small sites was preferred. The suitable small sites that were available (totalling 16 dwellings) together with a reasonable windfall allowance (some 13 dwellings) were considered able to achieve the required level of proportional housing growth. The scale of development now indicated in this representation reflects the size of sites accepted elsewhere as falling within the category identified as a small site within the Meeting Housing Needs and Site Assessment Report (paragraph 4.2). The Parish Council has sought to increase the level of certainty towards achieving the 13-dwelling shortfall through entering into a Memorandum of Understanding with Ross-on-Wye Town Council to utilise 10 dwellings from its over provision. This Memorandum of Understanding indicates that Walford Parish Council will use its best efforts to meet its housing target by including within the proposed Plan all small suitable sites and its entire calculated windfall allowance for the parish. Hence to meet the terms of Memorandum of Understanding, this small site should be included in the NDP in that it complies with Option 3 (the chosen option) as described in paragraph 3.17.	
C.2	Policy WALF5	Objection	Query the identification of the setting of Sharman's Pitch as Fig 15 as being the key view of Sharman's Pitch. This is dominated by modern agricultural buildings. No justification for its inclusion The settlement cluster of Sharman's Pitch sits within the Wye Valley AONB, and its setting is important to its character and landscape quality of the nationally designated landscape. The policy seeks to protect its setting which is described in paragraph 5.3 under the heading '<u>The setting of Sharman's Pitch viewed from the south</u>'. The view shown is from the public footpath travelling towards the settlement from the south with the agricultural building diminishing as Sharman's Pitch is approached, being behind you as you enter the AONB. The agricultural building reflects its rural character although lies outside of the AONB boundary. The settlement cluster is the result of small-scale organic growth within a woodland setting and is a characteristic of the particular landscape type (see Herefordshire Landscape Characteristic SPD landscape type -Forest Smallholdings	No change proposed as a consequence of this representation

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			and Dwellings – page 45) https://www.herefordshire.gov.uk/downloads/file/2069/landscape_character_assessment_for_herefordshire Justification is included in the NDP for the settlement cluster's setting and the view presented.	
	Policy WALF17	Objection	Affordable Housing. Para 64 of the NPPF is noted however the plan clearly states that there is evidence that there is little or no need for affordable housing in the Parish, thus there is no need to require affordable housing at a lower level than that identified in the adopted Core Strategy. No allowance is made for brownfield sites as per para 24 of the adopted Core Strategy. The plan does indicate that on the evidence available at the time the plan was prepared that there is little local need for affordable housing. However, such need may vary over the timescale covered by the NDP. Furthermore, a requirement has been set for the rural part of the Ross-on-Wye Housing Market Area and the Parish may contribute towards this (see NDP table 1). Given that small housing sites are proposed within the NDP, the reduced threshold is apposite. The policy does, however, recognise that a lower rate of provision might be required according to evidence at the time. The reference to paragraph 24 of the Core Strategy is uncertain. There is nothing in this policy that would restrict the provision in Core Strategy policy RA2 that refers to making the best and full use of <u>suitable</u> brownfield sites in or adjacent to settlements wherever possible. For Howle Hill (Figure 4.15 settlement) suitability might be expected to be determined through proposals demonstrating 'particular attention to the form, layout, character and setting of the site and its location in that settlement and/or they result in development that contributes to or is essential to the social well-being of the settlement concerned.' In addition, it is noted that NPPF paragraph 120 refers to giving 'substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land'. Again, there is nothing in this NDP policy that would conflict with this provision. Within the local context, there is limited if any brownfield sites that are expected to come forward during the plan period. In preparing the NDP, the definition of brownfield sites within the rural context was investigated, including viewing previous planning decisions, and it is understood that this excludes land that is or has been occupied by agricultural or forestry buildings and also that horticulture is considered a form of agricultural activity. It is, however, recognised that a planning Inspector has deemed a site at Waters Edge to be a brownfield site and granted planning permission for housing upon it. Differences in interpretation upon a particular aspect of land use appears to be fairly common in planning decisions and this would not invalidate the provisions in this policy.	No change proposed as a consequence of this representation
	Policy WALF20	Objection	Housing Development in Howle Hill Object to the exclusion of Howle Hill Nursery and Crossways from the proposed settlement boundary. Indeed, this area is the focus of new development in the village. Appeal Decision APP/W1850/W/21/3271693 allowed September 2021. Within the appeal decision the Inspector clearly stated that the site lies within the settlement of	See Changes 30 to 33 and 38 in relation to defining a new settlement

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			Howle Hill and is an appropriate location for development. This is a common theme throughout the appeal decision <i>18. In this context, there is development along Sharman Pitch and Star Beech Hill, where the site is almost equidistant from the eastern and western extents of development, which are established by Little Howle Farm and a cluster of residential development respectively. Consequently, it would be reasonable to determine that the site is within the eastern and western extents of the main built-up area of the settlement.</i> <i>19. The site is approximately on or above the southern parallel of Little Howle Farm and other existing and potentially forthcoming residential development to the east and cluster of residential development to the west. It does not extend beyond this southern parallel to any material extent. Consequently, it would be reasonable to determine that the site is within the southern extent of the main built-up area of the settlement.</i> <i>20. There is appreciable development along Church Lane to the north-east, sweeping southwest, and comprise clusters of residential development. This would appear to roughly define the northern extent of the settlement. Consequently, it would be reasonable to determine that the site is within the northern extent of the main built-up area of the settlement.</i> <i>21. Altogether, the site is well related to existing development, being adjacent to residential development in the immediate vicinity, whilst also respecting the various extents of the main built-up area. Field parcels that permeate the settlement are features of its fragmented low-density pattern of development and reflective of its rural setting. They do not segregate the site from other development, and it is clear from my foregoing assessment that the site falls within the main built-up area of Howle Hill, not outside of it.</i> The original 'Meeting Housing Need and Site Assessment Report', published in August 2020, included for Howle Hill, a proposed 'Northern' settlement boundary that projects a further 130m further southwest of the penultimate buildings, across open land, simply in order to capture a final two dwellings at the former chapel. This is firstly evidence in itself of the fragmented character of the settlement but it also follows that extending the separately proposed 'Sharman Pitch' settlement boundary a comparatively limited 50m to connect to the already developed and approved appeal site and its residential context would not be unreasonable by the document's own logic. Both Reports (August and December 2020 respectively) and the current regulation 14 document fails to reflect the existence of the extant outline planning permission directly eastward of the recently allowed appeal site and the permission for 8 dwellings on the appeal site itself. This reflects considerable limitation to the robustness of the approach to settlement boundaries and site selection likely, if unaddressed, which would stymie the NDP's progress. Continuing with this stance would, it is considered, mean that no reliance whatsoever can be placed on its flawed approach to setting settlement boundaries pursuant to CS Policy RA2. As such it is contended that the Inspectors comments are an important material consideration in the designation of the development boundary of the settlement and should not be discarded. Thus, Howle Hill Nursery should be included within the defined development boundary and should be considered one of the key focal areas of the	cluster including Howle Hill Nursery (Water's Edge). No change proposed in relation to the representation seeking inclusion of the gap between the current boundary defined for the Sharman's Pitch Cluster and that at Howle Hill Nursery, or the exclusion of land at the western end of the Church Lane Cluster.

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			village, opposite the War Memorial. The attached plan shows the suggested development boundary which links Howle Hill Nursery to the proposed development boundary for Sharman's Pitch. This would allow for an additional 2 or 3 dwellings set in larger plots which would meet the Plans aspirations for small scale residential development in character with the setting of the area. The inclusion of land within a defined development boundary indicates that residential development is in principle acceptable subject to meeting the requirements of other policies within the Core Strategy. The inclusion of the area (hatched in orange on the attached plan) between the Chapel and the next adjacent dwelling in the proposed northern settlement, would include an area of agricultural land currently in arable use. No justification has been provided for its inclusion in the development boundary which would result in loss of agricultural land and a strong incursion into the open countryside. This would appear to conflict with the aims of the NDP itself. This area should be removed to limit development extending into open countryside. Furthermore, the inclusion of this greenfield site over and above a site of previously developed land which has permission for 8 dwellings and the adjacent site with permission for 4 dwellings would render the NDP settlement proposals inconsistent with both the Core Strategy and the NPPF where considerable weight is given to brownfield land.  The appeal decision referred to is acknowledged. However, the Parish Council finds itself in a difficult position in relation to defining a settlement boundary in that it is aware of a number of potentially conflicting planning	

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			decisions in this area, including in planning appeals. More importantly it is aware that planning permission 172215/O, which comprises one of the two permissions referred to in the representation, was granted for two market dwellings and 2 affordable dwellings, with the latter being an important consideration. It is understood that an agreement under S106 has been entered into for the provision of the two affordable dwellings and the only policy basis for such a decision is understood to be under NPPF paragraph 78 which provides for rural exception sites that will provide affordable housing to meet identified local needs and allows some market housing on these sites to help to facilitate this. Consequently, should the site be included within a settlement boundary it would afford the opportunity for a new planning permission to be granted that would exclude the affordable housing element. Herefordshire Council has advised that a third cluster for the settlement of Howle Hill might be defined yet the above analysis is a fair one and that including sites in a settlement boundary with existing approvals for affordable housing (presumably below the threshold that would require its provision) may result in applications for market housing. A view is expressed that it might be possible for the NDP to include such sites on the proviso that they deliver affordable housing as per the existing approval - i.e., that the existing permissions are treated akin to an allocation. Another concern might, also, be that the absence of settlement boundaries creates uncertainty and has resulted in some very difficult and unpopular judgements. A alternative approach considered more appropriate is to wait until development is substantially complete. In this way, it should provide a high degree of certainty that the affordable housing will be retained. Should development of the site proceed swiftly, the NDP Examiner might be advised to include this site within a settlement boundary prior to referendum. Should development proceed more slowly, it might await a review of the NDP which would be expected following the review of the Core Strategy. This should be explained within the NDP. The issue is also clouded by previous planning decisions, including appeals, which represent a divergence of views upon what might constitute the settlement clusters. The Planning Inspector granting planning permission for the site at Howle Hill Nursery (Water's Edge) acknowledges that there has been a previous planning appeal decision that considered the area comprising the settlement but does not have the information forming the basis for that (Appeal decision para 22). Information within a number of previous decisions were utilised at the outset of preparing the NDP to define what were considered to be the built-up areas comprising the clusters forming Howle Hill, as recommended in Herefordshire Council's Neighbourhood Planning Guidance Note 20 – Guide to Settlement Boundaries. The appeal decision referred to in this representation came after significant progress in preparing the draft plan had been made and public consultation had been undertaken upon this. In determining what constitutes the built-up area of the settlement, regard was given to Core Strategy paragraph 4.8.16 which refers to 'Residential development will be located within or adjacent to the main built-up area(s) of the settlement'. Hence there appears to be a differentiation between the wider settlement and that which comprises its main built-up area. In this regard the configuration of Howle Hill reflects a fairly common characteristic of Herefordshire villagers where you often see outlying wayside dwellings/cottages a small distance beyond the	

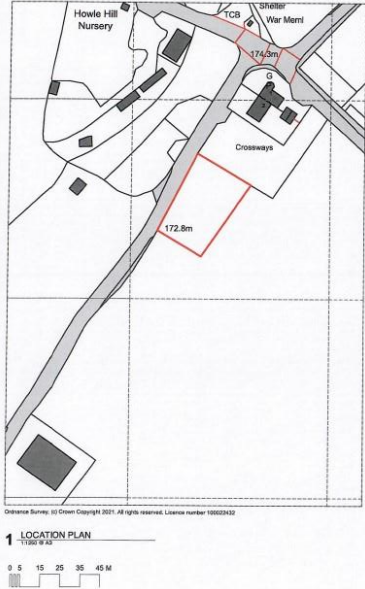
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			main built-up edge upon its approach. The former Herefordshire UDP acknowledges this feature by indicating for small villages, infill gaps should have a frontage of no more than 30m. (UDP policy H6 - https://www.herefordshire.gov.uk/downloads/file/5370/chapter-5-housing). As with the issue of determining whether a site amounts to brownfield land, it is recognised that differences in interpretation upon aspects covered by planning policies appear to be fairly common in planning decisions, as is the weight given to particular criteria by the decision maker. The substance of the representation appears to be: a) the extension of the Sharman's Pitch boundary to include the site at Howle Hill Nursery (Water's Edge) and the intervening land. b) The exclusion of land at the western end of the Church Lane Cluster. Extension to incorporate Howle Hill Nursery (Water's Edge): as indicated in the quote within the representation the Planning Inspector recognised that <i>'Field parcels that permeate the settlement are features of its fragmented low-density pattern of development and reflective of its rural setting.'</i> This is further emphasised in paragraph 27: <i>'27. The special qualities of the zone, in terms of the built environment, include small clusters of historic squatter settlements on valley sides surrounded by intricate patterns of small fields, drystone walls and narrow lanes, among other things. The special qualities of the zone, in terms of the natural environment, include hedgerow networks often with mature trees, among other things.'</i> The Planning Inspector gives no weight to the particular circumstances that applied to the site to the east of the Water's Edge site. Hence, in combination a new cluster of dwellings will be formed through the planning permission at Howle Hill Nursery and 1 and 2 Crossways. The intervening land between Water's Edge and the boundary defined for Sharman's Pitch was not submitted for consideration during the NDP's call for sites. Furthermore, should it be included, it would create a much larger cluster and the characteristic feature of 'field parcels permeating the settlement' identified by the Planning Inspector will be lost. Hence, this might be considered contrary to Core Strategy policy RA2 in that the loss of the gap might be contrary to the particular attention that should be given to <i>'the form, layout, character and setting of the site and its location in that settlement.'</i> Again, Herefordshire Council's response in referring to the defining of a third cluster is apposite. Also as referred to above, a fairly common characteristic of Herefordshire villagers is the presence of outlying roadside dwellings a small distance from the edge. Should a further cluster be defined, it is considered the gap between the current edge of Sharman's pitch and any new cluster including Howle Hill Nursery (Water's Edge) site should be retained as an important characteristic of the settlement form. In conclusion it is considered that a third cluster might be defined but it should incorporate the site at Howle Hill	

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			Nursery (Water's Edge) and 1 and 2 Crossways. Reference might be made to the reviewing the possible inclusion of development on the smaller site to the south-west of 1 and 2 Crossways within a boundary when that development is substantially complete. The policy for the settlement boundary should also seek to protect gaps between the settlement clusters in order to retain the settlement pattern that would be appropriate within this landscape type. <u>Exclusion of land at the western end of the Church Lane Cluster:</u> Notwithstanding the width of the frontage gap referred to, the western extent of the cluster along Church Lane was identified by Herefordshire Council Planning Officers and confirmed by a Planning Inspector – See paragraph A3.8 in Appendix 3 to the meeting Housing Needs and Site Assessment Report (August 2020). Herefordshire Council's Neighbourhood Planning Guidance Note 20 indicates Parish Councils should consider such planning history concerning areas on the edge of the village. Although the representation about the inclusion of this area has some merit, the advice given by planning officers/planning inspector has been given significant weight, in that to do otherwise would unlikely be supported by the Planning Office or Planning Inspectorate and be contrary to the approach adopted in relation to utilising Herefordshire Council's Neighbourhood Planning Guidance.	
	General	Objection	The Regulation 14 NDP in making no reference to the importance of previously developed land in assessing the development boundary for all settlements, but with particular emphasis on Howle Hill, is considered to be flawed and incompatible with both the adopted Core Strategy and the NPPF where considerable weight is given to the redevelopment of brownfield sites. Indeed Paragraph 120 of the Framework is clear that decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes. Furthermore, the failure to assess and reflect the recently allowed appeal decision at Howle Hill Nursery on previously developed land, and the adjacent extant permission for 4 dwellings, reflects a flawed approach and a lack of robustness to the approach to the designation of the settlement boundaries within Howle Hill. as such it is considered that the NDP is not in accordance with the NPPF and the adopted Core Strategy and will not stand up to scrutiny at a later stage. The NDP need not make reference to utilising brownfield land within settlements given the reference to this in Core Strategy policy RA2 and provided it does not seek to resist development on suitable brownfield sites, which the plan does not. The two sites referred to already have planning permission and the NDP cannot restrict their development within the terms of those permissions. How they should be accommodated within the NDP is addressed in the previous representation upon policy WALF20.	No change proposed in relation to this representation
	C.3	Recommends Change	The report indicates that there is mains drainage within Howle Hill - It is incorrect. There is NO mains drainage on Howle Hill. This report has been prepared by Herefordshire Council. That Council had previously been notified of the error who had indicated it would be rectified. However, it seems to have been missed. It will be drawn to the attention of Herefordshire Council once again.	Herefordshire Council to be advised that there is no mains drainage at Howle Hill but there is at

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				Coughton
C.4	Maps 2, 3 and 4	Recommends change	Add link before the maps to Magic Map which is an interactive tool and it is quite interesting to see what this can show for the area. Magic Map has been used to inform a number of matters covered in the NDP in addition to a number of other sources of information. Natural England has also recently published another interactive map for Green Infrastructure. This is a useful suggestion although the links might be shown in relation to policy WALF6 which refers to habitats and other relevant features within the Parish.	See Change No 13
C.5	Policy WALF4	Seeks change	It is right and proper to give the AONB protection, but perhaps, it is also right and proper to afford the adjacent areas a degree of security too. Might I suggest an addition of the phrase “within close proximity to the AONB.” It cannot be correct that development that is very close to and has a residual effect on AONB be considered by a different set of parameters. I appreciate this idea is subjective, but in the current climate not placing some security around the near environs of the AONB could be harmful. The landscape, scenic beauty and natural environment of an area is afforded protection through a range of policies in both the NDP and Herefordshire Local Plan Core Strategy. Those qualities within the Wye Valley AONB must be given great weight as a nationally important designated landscape. However, the policy afford protection to the whole landscape within the parish. Herefordshire Council’s Landscape Character Assessment is an important consideration in that regard. Should development outside but close to the AONB have an effect on the AONB (i.e. its setting) then it is considered this would be material to any decision and Policy WALF4 does refer to protecting the setting of the AONB.	No change proposed in relation to this representation
	Policy WALF12 and Policies Supporting and Encouraging Business	Seeks Change	There is no mention of protection for our residents or visitors that enjoy our rural landscape for horse riding. It is common enough to see these equine loving folks, hacking along our lanes and they should be protected in the policy documents. Perhaps in the traffic management region, or tourism? The NDP can only cover matters involving ‘development’. Policy WALF12 criterion i) seeks to protect the Public Rights of Way network and that would include bridleways. Core Strategy policy E4 supports measures advanced by the tourism sector, including encouraging improvements to the public rights of way network. It is considered unnecessary to duplicate this policy.	No change proposed in relation to this representation
	Environmental Report	Comment	I have made mention of this point previously, the use of the DEFRA and Natural England maintained “MAGIC” map instead of the Herefordshire Council supplied documents. The Supplied council documents appear to be scant in detail and do not supply a comprehensive picture of the locale. With a little fortitude and a few clicks a much fuller picture of the area covering Walford Parish can be obtained. This map is used by the council themselves along with potential developers. Targets have been set with regard to development for Herefordshire Council to achieve. It is therefore in their interest to succeed in this endeavour. The use of the “MAGIC” map offers a fuller picture of Walford Parish than Herefordshire Councils donation and may help shield the Parish against unsuitable, unsustainable development. How current are the offered documents from the council? Can they still be considered to be relevant, or in date? We have come a long way in recent years in regard to trying to protect our environment. It would be a pity not to robustly defend what is right for the lack of easily obtained information, and a naïve trust in an interested party.	No change proposed in response to this representation

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			Magic Map was used to inform the NDP as can be seen from Map 9 (Regulation 14 draft NDP) which shows the location of all ancient woodlands rather than the limited number identified in Herefordshire Council's Environmental Scoping Report. The information used in the Scoping Report has been found proportionate to the task of undertaking Strategic Environmental Assessments. Other, often more detailed, environmental information has been sought from a range of sources to inform the NDP. The NDP seeks to identify those issues that need to be addressed for particular forms of development and these include environmental considerations.	
C.6	WALF19	Comment and seeks change	We are pleased to see the inclusion within the settlement boundary of Land North of Leys Hill (Site Assessment ref: 26) for approximately 3 no. dwellings and can confirm the developer's interest in bringing this site forward with a high-quality, sustainable development in accordance with the draft NDP. We are also of the view that Site 28 represents a logical inclusion within the settlement boundary for one dwelling and recommend that the settlement boundary is amended to incorporate the land. A site plan for Site 28 and a further potential site is included with this letter.   Site 28 Further Potential Site Site 26 – Noted Site 28 – This site was considered in detail within the Meeting Housing Needs and Site Assessment Report. It was concluded that there are considerable concerns that access can be achieved to this site such that it is deliverable.	No change proposed in response to this representation

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			There are wider concerns that the junction of Leys Hill Road with the B4234 is at or close to its capacity and preference should be given to sites that have a greater certainty that they can be delivered. In addition, development of the site will result in adverse effects in terms of fitting development sensitively into the settlement. There would also be some adverse effects upon the landscape, upon the setting of the settlement and the ecological network. A Public Right of Way with a strong sense of tranquillity and rural character separates the site from any vehicular access and this would be detrimentally affected. As such it remains the view that the site should not be included within the settlement boundary, which strongly reflects the landscape character of the countryside in this location. <u>Further Potential Site</u> – This was also a submitted site (Site 27). This site was rejected at the Stage 1 assessment in the Meeting Housing Needs and Site Assessment Report. It is considered an isolated site and would not comply with Core Strategy policy RA2 but would have to be considered under CS Policy RA3. Like the previous site it exhibits a strong sense of tranquillity and rural character isolated from the built-up area of the settlement. It remains the view that the site should not be included within the settlement boundary and the site strongly reflects the landscape character of the countryside in this location.	
	WALF20		We note that the draft settlement boundary for Howle Hill does not include the development approved off Howle Hill Crossroads via 172215/O. the developer has recently received Reserved Matters approval for the development under reference 211348/RM, dated 31st January 2022. Herefordshire Council's 'Neighbourhood Planning Guidance Note 20: Guide to settlement boundaries' confirms that it is also advisable to include sites that have received planning permission within the settlement boundary. Given the existence of detailed planning permission for the site, we'd recommend that the settlement boundary for Howle Hill is amended to include this development site and the adjoining pair of semi-detached dwellings.	See Change No 32

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			 The planning permission granted for the site is noted. The Parish Council finds itself in a difficult position in relation to defining this site within a settlement boundary in that it is aware of a number of potentially conflicting planning decisions in this area, including in planning appeals. More importantly it is aware that planning permission 172215/O was granted for two market dwellings and 2 affordable dwellings, with the latter being an important consideration. It is understood that an agreement under S106 has been granted for the provision of the two affordable dwellings and the only policy basis for such a decision is understood to be under NPPF paragraph 78 which provides for rural exception sites that will provide affordable housing to meet identified local needs and allows some market housing on these sites to help to facilitate this. Consequently, should the site be included within a settlement boundary it would afford the opportunity for a new planning permission to be granted that would exclude the affordable housing element. Herefordshire Council has advised that a third cluster for the settlement of Howle Hill might be defined yet it also recognises that the above analysis is a fair one and that including sites in a settlement boundary with existing approvals for affordable housing (presumably below the threshold that would require its provision) may result in applications for market housing. A view is expressed that it might be possible for the NDP to include such sites on the proviso that they deliver affordable housing as per the existing approval - i.e., that the existing permissions are treated akin to an allocation. The NDP does propose to define settlement boundaries for its	

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			named settlements and an alternative approach considered more appropriate is to wait until development is substantially complete. In this way, it should provide a higher degree of certainty that the affordable housing will be retained. Should development of the site proceed swiftly, the NDP Examiner might be advised to include this site within a settlement boundary prior to referendum. Should development proceed more slowly, it might await a review of the NDP which would be expected following the review of the Core Strategy. This should be explained within the NDP.	
	WADF21	Comment	<u>Land on north side of Leys Hill Lane, Bishopswood</u>: We note and agree with the recommendation in respect of housing numbers and will take expert advice in respect of arboreal and ecological interests. <u>Land off Watling Street, Ross-on-Wye</u>: The landowner is conscious of the constraint posed by the oak trees and will work to preserve the requisite root protection area. Other requirements are noted, and development will be informed by a robust Landscape and Visual Appraisal. DCWW will be approached to determine the capacity of the foul sewer in due course. Noted with thanks	No change proposed in response to this representation
C.7	WALF1	Comment	I fully support this policy statement Noted with thanks	No change proposed in response to this representation
	WALF2	Comment	Do not understand how the already built-up settlement of Walford and Coughton can be infilled. The outlying rural settlements of Bishopswood and Howle Hill would seem to be inappropriate for further development as they are lacking in sustainable infrastructure provision to support additional housing needs and residents are reliant on their own car transport. My overall comment on the Draft is that there seems to be something of a mismatch in defining the outlying, rural settlements such as Bishopswood and Howle Hill for possible development when these would seem to be the least sustainable areas compared with the Walford and Coughton area along the B4234. I suggest the latter area already has the infrastructure to support further development on land that is available and deemed to be fit for purpose. One purpose of settlement boundaries is to draw the distinction between settlements and countryside where different policies apply. Policy RA3 is most relevant to housing outside of these boundaries. It is recognised that there are limited opportunities for infilling within the boundaries set for Walford and Coughton clusters although there are small gaps where small single dwellings might be accommodated. The defining of Bishopswood and Howle Hill as settlements where development might take place has been determined by the Core Strategy and it is understood that a range of criteria were used as the basis for this decision. It is not one that Walford Parish Council can change for this NDP. In determining the approach to allocating housing sites, significant weight was given to utilising small sites compared to medium and large sites. The Parish Council should be able to raise the issues of insufficient sustainable infrastructure and reliance on cars through the current review of the Core Strategy.	No change proposed in response to this representation

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	WALF8	Comment	There are significant issues of drainage from the hill areas of the parish where there is no mains drainage and inadequate provision for storm and surface water drainage which then impacts on the lower lying areas of the parish near to the B4234. It would therefore seem inappropriate to further increase this problem with further housing development in the hill locations. The presence of mains drainage in the Walford and Coughton settlement area would seem to support further development in this location. The presence of mains drainage was a consideration in ranking sites for development although it was only one of a number and the Parish Council gave significant weight to other factors in determining which it considered were the most appropriate housing sites.	No change proposed in response to this representation
	WALF13	Comment	Public transport provision only exists along the B4234 and so this could serve further development in the Walford and Coughton settlement area. It is unlikely that public transport would be re-instated in the upland and outlying areas of the parish thus making these unsuitable - ref sustainability of new housing. Again, this is a consideration among other matters but was outweighed by other factors when determining housing site allocations.	No change proposed in response to this representation
	WALF18	Question	Since the settlement boundary sits tightly round existing housing estates how is it possible for infilling to occur? It is recognised that there are limited opportunities for infilling within the boundaries set for Walford and Coughton clusters although there are small gaps where small single dwellings might be accommodated. The defining of a settlement boundary also serves to define where policy RA3 will be applied to housing development in the countryside.	No change proposed in response to this representation
	WALF20	Comment	The Howle Hill area has never previously been defined as a settlement and so its inclusion seems inappropriate given its situation in the outlying rural area of the parish, distant from the B4234 and with no sustainable infrastructure provision. The defining of Howle Hill as a settlement has been determined by the Core Strategy and objections to this should have been raised at the time that plan was prepared. The opportunity for this to be reconsidered may be available through the review of the Core Strategy.	No change proposed in response to this representation
	WALF21	Comment	Historically the area along the B4234 has always been 'earmarked' for development by HC and so I fail to see why the proposed Site 11 has not been included as a development site as its assessment deemed it suitable for inclusion in the plan The only record that can be found that suggests further development at Walford and Coughton is Herefordshire Council's Strategic Housing Land Availability Assessment which showed 2 sites along the B4234 and one along the road running eastwards towards Pontshill to have some degree of suitability. The Parish Council, when considering the options for site allocation, adopted an approach based on small sites, feeling it is most appropriate when determining which housing sites should be allocated and the options at that time for site 11 were either medium or large within the terms of the assessment undertaken.	No change proposed in response to this representation
	Appendix 3b Appropriate Assessment Policy	Comment	Throughout this section there is reference to Bishopswood and Howle Hill as villages which is both inaccurate and misleading in description and inconsistent with the HC Core strategy which refers to these locations as settlements. Case law has determined the characteristics of a village and whilst Bishopswood might be described as a village Howle Hill most certainly cannot be so. There is also frequent mention of proportionate growth but as I can't seem	No change proposed to the NDP in response to this

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	Assessment		to find a definition for this term I am unclear as to its meaning and any resulting implications. There are many typo and grammatical errors throughout the text which is 'disappointing' in a document of this importance These matters will be drawn to the attention of Herefordshire Council who prepared the document.	representation. Comments to be passed to Herefordshire Council.
	Environmental Report	Comment	Absence of consistent page numbering throughout the section makes it difficult to follow through the content. This matter will be drawn to the attention of Herefordshire Council who prepared the document.	No change proposed to the NDP in response to this representation. Comments to be passed to Herefordshire Council.
	Whole Plan	Comment	I'd like to commend the efforts of the NDP SG/WG who have over many months spent hundreds of hours preparing this draft document. Noted with thanks	No change proposed to the NDP in response to this representation.
	Supporting Documents	Comment	Ref the HC documents, I find it of concern that there is virtually no or at best inconsistent page numbering throughout. There are many typo and grammatical errors (too numerous to list) throughout the texts which is 'disappointing' in documents of this importance in relation to the draft NDP. Unfortunately, I don't feel able to make reasonable comment on the content of the HC documents as I am unfamiliar with both the format and nature of such reports. This matter will be drawn to the attention of Herefordshire Council who prepared the document.	No change proposed to the NDP in response to this representation. Comments to be passed to Herefordshire Council.
	C.8	Seeks change	Policy WALF 18 starts with 'New housing within Walford and Coughton will be restricted to sensitive infilling within a settlement boundary identified for development shown on Walford and Coughton Policies Map' However the proposed settlement boundary provides virtually no opportunity for infill as the 'built up' area that it encompasses is already the subject of relatively high density development and the few apparently undeveloped areas on the map are already the subject of completed development or planning commitments. In terms of 'proportional' development the Core Strategy/Rural Housing Paper identifies Walford(Coughton) as containing approximately 224 dwellings (in 2012). This makes it much the largest settlement in the Parish – Howle Hill has approximately 55 and Bishopswood 47. It appears to be virtually impossible to accommodate ANY proportionate infill growth in Walford and Coughton with the current policy / settlement boundaries. It is also noted that Site 11, adjacent to the	No change proposed to the NDP in response to this representation.

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			proposed settlement boundary, was ranked technically as the most favourable development location but has been omitted from this draft plan. Leaving policy WALF18, and the Walford and Coughton settlement boundary as proposed, will force infill development into the other 2 settlements, both of which are already the subject of significant existing planning commitments and both of which have notable sustainability issues in terms of poor road access, no public transport links, no access to main drainage, dependence on private motor vehicles for all day-t- day activities. It is notable that Walford & Coughton has only 2 extant development commitments and only 3 completions since 2011, which is far less than the other 2 named settlements, even though it is identified (by HC) as the location where the majority of development is expected to occur, presumably because of size and access to facilities (bus service, local school, main drainage, a main road). Policy WALF18, and the associated settlement boundary, should be reviewed in terms of the practical implementation of 'proportionate' infill development in Walford & Coughton, taking account of the location of planning commitments and completions since 2011, and the on-going Government/Local Authority strategy of trying to ensure that all new development is 'sustainable'. One purpose of settlement boundaries is to draw the distinction between settlements and countryside where different policies apply. Policy RA3 is most relevant to housing outside of these boundaries. It is recognised that there are limited opportunities for infilling within the boundaries set for Walford and Coughton clusters although there may be small gaps where small single dwellings might be accommodated. In determining the approach to providing new housing within the parish, the Parish Council gave significant weight utilising small sites and considered the options submitted for site 11 were of too great a scale and density. The defining of settlement boundaries for all three settlements accompanied by design policies should afford appropriate protection to Bishopswood and Howle Hill.	
	WALF19/20	Comment	The policy for both Bishopswood and Howle Hill is for 'New Housing ... will be restricted to sensitive infilling within a settlement boundary'. Once existing commitments for Bishopswood have been taken into consideration there is very little land available for 'infill' so, in fact, the only settlement with significant land available for infill development is Howle Hill (using the proposed settlement boundaries). However, both Bishopswood and Howle Hill are already the subject of the majority of existing planning commitments in the Parish. Therefore, the concept of 'proportionate' development is incompatible with the practical implementation of Policies WALF18, 19 & 20. In the current Plan Period (from 2011) Howle Hill has 1 new completed dwelling and commitments for a further 12 dwellings (either within or in close proximity to the proposed settlement boundaries), which is a proportional increase of 23%. Bishopswood is the only settlement with allocations under this plan (a total of 11 dwellings) and it has extant commitments for 8 new dwellings. So, in terms of proportionate development this represents an increase of 40% over the 2011 settlement size. It is difficult to see how Policies WALF 19 & 20, taken in conjunction with policy WALF18 and policy WALF21, can be considered to represent 'proportionate' development for either Bishopswood or Howle Hill. Those 2 settlements will have to accommodate the majority of the 18 'windfall' dwellings (assuming that there is little scope for further rural conversions) and they have already increased in size by 23% & 40% whilst Walford & Coughton has only expanded by 2% in 10 years. With the current Walford & Coughton settlement boundaries these policies are effectively restricting development to the least sustainable locations within the parish. As the Plan is currently drafted, there would seem to be significant issues in terms of	No change proposed to the NDP in response to this representation.

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			directing development towards areas where there is no access to local services, the potentially negative climate impact of increased use of private motor vehicles together with water table pollution problems associated with private drainage systems in areas with ongoing surface water flooding issues.	
			Notwithstanding the titles to Tables 4.14 and 4.15, Core Strategy policy RA2 defines the approach to accommodating new housing development. In addition, Herefordshire Council has advised that the NDP can determine how it spreads new housing between its settlements. The approach taken has primarily been upon the basis of utilising suitable small sites submitted for consideration within or adjacent to the parish's settlements. The other factors suggested were considered and weighed. Other policies in the NDP seek to mitigate the effect of development, for example, controlling pollution and surface water flooding effects.	
	Appropriate Assessment - General	Comment	This document is poorly presented with many instances of missing or incorrect wording and no page numbering. Whilst it has clearly been produced against a standard template it is very sad that the Local Authority is not taking more care in the delivery of such key documentation.	No change proposed to the NDP in response to this representation. Comments to be passed to Herefordshire Council.
			This will be drawn to the attention of Herefordshire Council.	
	Appropriate Assessment – Para 5.3	Seeks changes	The introductory sentence seems inconsistent/incomplete. This part of the statement is not clear ‘topic bases areas and 1 site allocation’ There appear to be missing commas in the list and also the current NDP makes 4 specific site allocations, not 1.	No change proposed to the NDP in response to this representation. Comments to be passed to Herefordshire Council.
			This will be drawn to the attention of Herefordshire Council.	
	Appropriate Assessment – Para 7.7	Seeks change	Reads ‘Therefore, this is not a mitigate measure’. Should this read ‘mitigation’?	No change proposed to the NDP in response to this representation. Comments to be passed to Herefordshire Council.
			This will be drawn to the attention of Herefordshire Council.	
	Appropriate	Seeks change	Reads ‘Although the Walford NDP contains a number of policies seeking to protect and enhance biodiversity and	No change

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	Assessment – 7.15		feature of the SAC.’ What does the ‘Although’ refer to please? This will be drawn to the attention of Herefordshire Council.	proposed to the NDP in response to this representation. Comments to be passed to Herefordshire Council.
	Appropriate Assessment – 7.17	Seeks change	Reads ‘Drainage fields is more that 50m from the designated site boundary and;’ Presumably should read ‘Drainage field is more than...’ This will be drawn to the attention of Herefordshire Council.	No change proposed to the NDP in response to this representation. Comments to be passed to Herefordshire Council.
	Appropriate Assessment – Para 8.7	Seeks change	Reads ‘The most significant issue is regarding water quality and these is the forms the majority of the assessment of these policies.’ Doesn’t make sense, perhaps the ‘these is the’ should read ‘this’?? This will be drawn to the attention of Herefordshire Council.	No change proposed to the NDP in response to this representation. Comments to be passed to Herefordshire Council.
	Appropriate Assessment – Para 8.9	Seeks change	States: ‘..as there are not main facilities within the parish...’. This is incorrect and conflicts with para 7.7 which states ‘It is however noted the majority of the areas within the Walford parish are not on mains drainage,’. In fact Walford (Coughton) is served by mains drainage and connected to The Lower Cleeve water treatment works. This will be drawn to the attention of Herefordshire Council.	No change proposed to the NDP in response to this representation. Comments to be passed to Herefordshire Council.
	Appropriate Assessment –	Comment	This Appendix contains a number of significant factual errors but as it is presumably included for historical reference these are no longer of any concern?	No change proposed to the

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	Appendix 1		This will be drawn to the attention of Herefordshire Council.	NDP in response to this representation. Comments to be passed to Herefordshire Council.
	Appropriate Assessment – Appendix 3b	Seeks changes	No page or table numbering makes it very difficult to provide specific comments on the numerous typographical errors. The source document needs a complete QA/proofread to resolve this. Examples: The first entry, for Main sewerage system, starts with this sentence ‘There is no main drainage within the villages of Bishopswood and Howle. Hill, Walford Coughton is partially has mains drainage. Howle Hill doesn’t have a full stop between the two words and the second part should presumably read ‘Walford Coughton has partial mains drainage’ Next entry, against WWTW, first sentence states ‘The proportional growth requirement is within the expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water. Should presumably read ‘The proportional growth requirement is within that expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water. This will be drawn to the attention of Herefordshire Council.	No change proposed to the NDP in response to this representation. Comments to be passed to Herefordshire Council.
	Environmental report - general	Seeks changes	Similar comments to the AA in respect of typographical errors and no page numbering This will be drawn to the attention of Herefordshire Council.	No change proposed to the NDP in response to this representation. Comments to be passed to Herefordshire Council.
	Environmental report – para 1.8	Seeks changes	Statement conflicts with Core Strategy policy RA2 which defines one main settlement, Walford (Coughton) and 2 other settlements (Bishopswood and Howle Hill), not 3 main settlements. The shop & petrol station are on the Southern boundary of the parish! This will be drawn to the attention of Herefordshire Council.	No change proposed to the NDP in response to this representation. Comments to be passed to Herefordshire Council.
	Environmental report – para	Seeks changes	Table 4.14 of the Local Plan is entitled Figure 4.14: The settlements which will be the main focus of proportionate housing development. Walford (Coughton) is included in this list. Table 4.15 is entitled Figure 4.15: Other	No change proposed to the

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	1.17		settlements where proportionate housing is appropriate. It is therefore incorrect to state that Bishopswood and Howle Hill are main settlements for proportionate housing growth. They are clearly identified, in the current revision of the Core Strategy, as 'other settlements'. The LA should be consistent in their use of definitions within the different levels of planning documentation. This will be drawn to the attention of Herefordshire Council.	NDP in response to this representation. Comments to be passed to Herefordshire Council.
	Environmental report – para 2.9	Seeks change	Reads: The consultation resulted in 2 responses, which is attached at Appendix 3. Should be 'are' not 'is' ! This will be drawn to the attention of Herefordshire Council.	
	Environmental report – Appendix 5	Seeks changes	Throughout this appendix there are frequent/repeated references to the villages of Walford, Coughton, Bishops Wood and Howle Hill. [It is not possible to tabulate all of the occurrences as the document contains no page numbers & no paragraph numbering in the appendices] Firstly, the current version of the Core Strategy does not refer to villages, it defines rural locations as main and other settlements. So for this document to start using the term 'villages' is inconsistent. Secondly, Howle Hill does not meet the generally accepted definition of a 'village' but would be referred to as a 'hamlet'. This distinction is relevant in relation to the NPPF where 'villages' are the subject of specific provisions. The comments made by the Planning Inspector in his decision to Appeal Ref APP/B3438/W/18/3211000, dated 25th January 2019, are a case in point. Paragraph 4 gives the Inspector's decision on the key facilities that a 'village' should contain. None of these facilities exist within the settlement of Howle Hill – a place of public worship, community buildings, a public house, a meeting house – although they are present in both Walford/Coughton and Bishopswood. The statement, as written, is also incorrect as it lists 4 'villages', apparently separating Walford/Coughton into 2 separate entities whilst the NDP defines them as a single, dispersed settlement. This will be drawn to the attention of Herefordshire Council.	No change proposed to the NDP in response to this representation. Comments to be passed to Herefordshire Council.
	Whole Plan	Comment	As noted above the draft Plan is putting forward policies that seem to be incompatible when viewed as a complete package. In isolation the policies appear rational but, taken as a whole, those that deal with actual development locations are 'at odds' with the overall planning objectives, particularly those concerning environmental issues and sustainable development. The Plan seeks to meet the needs of necessary development, in particular housing, in accordance with Herefordshire Local Plan Core strategy. In relation to housing, environmental issues were used as the basis for many of the considerations to determine whether a site was suitable. All the housing sites allocated for housing	

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			were found the be suitable and together with a reasonable allowance for windfall developments, should provide for the required level of proportional housing growth. The chosen option to utilise small sites was also informed by the community consultation that was undertaken.	
	Appropriate Assessment and Environmental Report	Comment	The 2 documents prepared by the Local Authority are disappointing in terms of the apparent lack of attention to grammatical accuracy and also the use of terminology that is not consistent with the primary level documentation – The Core Strategy. This will be drawn to the attention of Herefordshire Council where they have been identified.	No change proposed to the NDP in response to this representation. Comments to be passed to Herefordshire Council.
	General	Suggests change	Minor point - it can be a good idea to include page numbering on multi- page documents (i.e. this comments form), just to make sure that nothing goes missing! This will be drawn to the attention of Herefordshire Council where they have been identified.	No change proposed to the NDP in response to this representation. Comments to be passed to Herefordshire Council.
C.9	Whole Plan	Comment	The draft NDP is an impressive document & has obviously involved an awful lot of effort in putting it together. Many thanks to all those who have been involved thereby enabling the local community to be more actively involved in development decisions. Note with thanks	No change proposed to the NDP in response to this representation.
	Paragraphs 2.1 and 2.20	Suggests change	The first states ‘approximately two thirds of the Parish fall within the Wye Valley AONB’. The second states ‘approximately three quarters of the Parish falls within the Wye Valley AONB’. For consistency, please may I suggest one of the paragraphs is updated. Thank you for identifying this inconsistency.	Para 2.1 amended to read <u>‘approximately three quarters’</u>
	Paragraph 2.33	Suggests change	There is something odd at the end of the 3rd line which I believe needs fixing ” narrow intersecting lanes fringed by wayside cottages d. The associated...’ The sentence is effectively a quote from Herefordshire Council’s Landscape Character Assessment document, although it would benefit from a minor change to indicate ‘landscape type’.	See change No 6
	Paragraph 3.6	Comment	Regarding further development the following point should seriously be taken into consideration when applications are assessed namely the full impact of any change in water course that would arise from concreting over existing	No change proposed to the

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			land that enables rainwater to naturally soak away, especially if existing neighbouring properties to the land are at a lower level. Policy WALF10 includes seeking designs that make the maximum use of permeable surfaces.	NDP in response to this representation.
	Paragraph 4.2	Comment	Regarding further development the following point should seriously be taken into consideration when applications are assessed namely preserving the character, landscape, wildlife as well as ancient woodlands whilst accommodating the needs of the local community - I would prefer to see developments taking advantage of 1) the bus routes thereby limiting the need for a high number of extra cars per household, plus consideration given to the existing infrastructure & whether the existing lanes/roads can safely accommodate extra traffic, 2) the existing facilities such as the village halls & local school. 3) existing drainage systems to limit the effect on the environment. Noted. These were issues that, among others, were weighed in determining the suitability of housing sites and are also matters addressed through policies included in the NDP	No change proposed to the NDP in response to this representation.
	Additional matter	Comment	I would also like the agricultural areas kept for crops or grazing, rather than fields/meadows and the associated plants/wildlife being destroyed for new developments. The NDP is required to accommodate certain development requirements, but the approach taken is to retain important wildlife sites wherever possible. Government has issued guidance upon the protection of the best and most versatile agricultural land and a change to include this within the NDP is suggested to address this representation.	See Change No 9
C.10	Policies WALF4 and WALF5	Comment	The measures listed to protect the Wye Valley AONB from inappropriate or major development, in accordance with NPPF Paragraph 177, are welcome but, in the past, such large-scale developments have been permitted which is in contradiction to these aims. There should be more emphasis on protecting the views from high ground, rights of way and other panoramic view-points. The settings of sensitive features, both in and outside the AONB, should be valued. Map 2 does not show the location of receptors of views outside the AONB but still within the Parish. There are many important views from higher land within the Parish, but there are also important views at lower levels. Those identified are presented in the main to show important views of each settlement's setting, which is where most development is considered likely. Important views from the Wye Valley Walk are also highlighted. The landscape more generally, and not just that within the AONB, is offered what is considered to be an appropriate level of protection through policy WALF4. The landscape of the Wye Valley AONB is, however, considered to be of national importance. Policy WALF4 includes the protection of the AONB and it's setting. Maps 2, 3 and 4 should be read in association with Figures 2 to 15 which show the receptors. No views within the Parish yet outside of the AONB have been identified but any that are highlighted in the future might be included in a review of the NDP.	No change proposed to the NDP in response to this representation.
	Policy WALF8	Comment	Wastewater Drainage: With the current serious contamination of the River Wye SAC SSSI it is more imperative than ever that wastewater drainage does not contribute to the pollution of this important river or any of its tributaries, in particular the Castle Brook (sometimes called Coughton Brook). The Parish is poorly served with public sewers. Noted. This policy seeks to protect the River Wye and its tributaries within the Parish from pollution, requiring	No change proposed to the NDP in response to this representation

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			appropriate evidence to be provided with planning applications to indicate wastewater can be accommodated satisfactorily. This is supported by policy WALF6, in particular its final paragraph.	
	Policy WALF10	Recommends change	Sustainable Design: (c) there should be a specific recommendation that public footways are provided generally; the B4234 runs through the main village centre without footways along most of its length; where they exist they are often narrow and difficult for pushchairs, wheel chairs etc. Policy WALF10 covers works required in association with development proposals. The provision of new or improvements to existing footpaths along existing roads would be a matter for discussion with Herefordshire Council as Highway Authority. The intention of Policy WALF13, which is consistent with Core Strategy policy SS4, is to promote such measures. However, it depends upon Herefordshire Council's works programmes.	No change proposed to the NDP in response to this representation.
	Policy WALF17	Comment	Design and Appearance: (h) there is a need for 2 and 3 bedroomed family houses with adequate garden space for children to play and for 1 to 2 bedroomed smaller houses for the elderly; too many large, executive-type houses have been permitted which do not match this need. It is noted that, within AONBs, the revised policy in NPPF para. 64 dictates that developments of 6 or more houses can require affordable housing. These matters are covered in this policy	No change proposed to the NDP in response to this representation.
	Paragraph 7.5	Comment	The existing modest houses with small gardens, designed for elderly people, at FOWBRIDGE (misspelled in the text on page 56) Gardens, opposite Priory Lea, are commendable. Many thanks for highlighting this error	Spelling error to be corrected.
	Policy WALF21	comment	Proposed Housing sites: The four sites proposed in this draft will only provide c. 16 houses but another site adjacent to Cedar Grove, to the west of the B4234 and alongside it, would be convenient to the Primary School, bus stops, the Walford Village Hall and St. Michael's Church and could be connected to the mains water/sewerage system. Advice noted. The approach adopted in the NDP was to utilise suitable small sites while the site submitted adjacent to Cedar Close did not fall into this category.	No change proposed to the NDP in response to this representation.
	Policy WALF23	Comment	Polytunnel Proposals: Scale and location apply, especially where such developments with their associated workers' housing provision etc. are within the AONB. In this Parish there is one such development within the AONB and another one just outside the AONB but within its setting. In future such large scale polytunnel or other intensive building proposals in sensitive locations should meet much more stringent criteria. WALF23 contains those criteria considered most relevant while other policies in the NDP may also apply according to the particular circumstances of the proposal.	No change proposed to the NDP in response to this representation
	Environmental Report and Appropriate Assessment	Seeks changes	There are numerous mistakes in spellings, sentence construction, wording and occasional misinformation...i.e. the first page of the non-technical summary of the Environmental Report states that Ross on Wye lies to the <u>south</u> of the neighbourhood area. These mistakes are not as evident in the Draft NDP itself. Additionally, comments are difficult on both the Environmental Report and the Appropriate Assessment Report as the pages are not numbered. Before a final draft is prepared these errors/omissions should be amended.	No change proposed to the NDP in response to this representation. Comments to be passed to

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			This will be drawn to the attention of Herefordshire Council where they have been identified.	Herefordshire Council.

Schedule 2: Stakeholder Organisations Representations and Responses

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	Walford NDP is in general conformity with the policies of the Core Strategy, Strategic Planning therefore raises no objections to this draft NDP. Overall, the plan is structured and written well, and the objectives and policies set out are clear. This is a very well set out document that demonstrates a detailed understanding of the pressures and constraints. Noted	No change proposed in response to this representation
	List of Policies	Recommends change	Include page numbers for the individual policies as this makes for far more efficient use Helpful suggestion	See Change No 3
	Whole Plan	Comment	It should be recognised that contamination is a material planning consideration and is referred to within the NPPF. 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. The issue of contaminated land is covered by policy WALF10 (g)	No change proposed in response to this representation
	Para 1.6	Recommends change	Could do with an edit to make the paragraph read better. Suggestion accepted	See Change No 5
	Objectives	Recommend change	<i>Objective 1 - To ensure that development contributes positively the Walford Parish's environment through:</i> Is this missing a word? I think this could be amended to read better. <i>Objective 2- Promoting informal recreation activities for the whole community based upon access to the countryside and promoting walking and cycling - Would have been nice to see mention of secure cycle parking provision here.</i> <i>Objective 3 - Would have been nice to see mention of secure cycle storage / parking provision here.</i> <i>Objective 5 - Would have been nice to see mention of secure cycle parking provision here.</i> Objective 1 - Typographical error noted Objectives 2, 3 and 5 – the objective 'Promoting walking and cycling' would incorporate the range of measures that might be appropriate and not just cycle storage/parking and hence unnecessary to be so specific.	Omission of word corrected – <i>positively to the</i> No change proposed in response to the other representations
	Policy WALF1	Comment	Policy is in general conformity with Core Strategy. Could have included under g) and support and encourage walking and cycling as the mode of choice (to support Objective 5 i and ii) Conformity noted Although supporting and encouraging walking and cycling is important, the ability to influence these through the NDP is limited to a small number of specific measures that are best included in more detailed policies.	No change proposed in response to this representation
	Policy WALF2		Policy is in general conformity with Core Strategy. There is a lot packed into this policy. I think this could be set out better and reworded in the interests of Clarity. Maybe the way this is set out could be amended. You could specifically name the site is proposed in Walford parish but is on the Ross-on-Wye fringe. Conformity noted. The policy sets out the overall local strategy for accommodating the various forms of development	See Change No 10

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			likely to be required within the Parish over the plan period. It is considered that the policy sets out the key development requirements succinctly although the concern expressed might usefully be met through each being presented in separate paragraphs. The site on Ross-on-Wye urban fringe is named in policy WALF21 as well as other sites allocated for housing in other settlements. However, this policy might refer to the site being adjacent to Ross-on-Wye settlement boundary.	
	Policy WALF3		Policy is in general conformity with Core Strategy Conformity noted	No change proposed in response to this representation
	Policy WALF4		Policy is in general conformity with Core Strategy. Recently it's been made clear locally that CS policies should be better linked to the Wye Valley AONB Management Plan. Would be potentially useful to make the link to this material consideration within this policy which will in time have greater weight. Conformity noted. A link to the Management Plan, as suggested, should be included.	See Change No 11
	Policy WALF5		Policy is in general conformity with Core Strategy. Valued landscapes and views can be quite a subjective matter. Have the views identified in this policy been evidenced, for instance through resident survey responses? Recently it's been made clear locally that CS policies should be better linked to the Wye Valley AONB Management Plan. Would be potentially useful to make the link to this material consideration within this policy which will in time have greater weight. For ease of use the policy could reference the important view numbers already included on the map for each area. Conformity noted. The views were identified by a working group and are presented in detail within the NDP for public comment. They primarily define those views which indicate the setting and character of settlements, which is where most development is expected. In addition, it is considered that views from the Wye Valley Walk should be recognised and protected. The need for views to be identified was highlighted during the public consultation and are important to the landscape quality representing in the main the transition from uplands to the lowland valley of the River Wye. The identification of views is considered to contribute towards the requirements of Wye Valley AONB Management Plan, especially policy WV-L1 'Promote and develop policies and initiatives to conserve, enhance, restore or create the features and elements that maintain the Special Qualities, landscape character and natural beauty of the AONB. Ensure their sustainable management and mitigate, reduce or remove detrimental features.' Identification of views by the community is recognised as important within the European Landscape Convention, to which the UK Government is a signatory. The response to the previous representation addresses the issue of referring to the Wye Valley AONB Management Plan. Material from that Management Plan is also included in Appendix 3 to assist in defining where proposals may amount to 'Major Development' (policy WALF3). It is agreed that the inclusion of view (and corresponding Figure) numbers within the policy would be helpful	See Change No 12
	Policy WALF6		Policy is in general conformity with Core Strategy. Pleased to see that nutrient neutrality criteria is included in this policy. The policy could also refer to Local Plan Core Strategy policies SD3, SD4, LD1, LD2 and LD3 or their replacements as natural environment enhancement and river quality is covered in these policies.	See Changes No 13 and 15

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			Edit in the recommended wording for nutrient neutrality (text below) and remove any duplications. <i>Development would not have an adverse effect on the River Wye Special Area of Conservation ("SAC") and species of European importance. In particular, planning permission will only be granted if clear and convincing evidence is provided which shows that the proposed development would not increase nutrient inputs to the SAC. This could include through the delivery of mitigation measures to make a proposal nutrient neutral. Reference should be made to Herefordshire Council's Phosphate calculator and associated guidance and the development should:</i> <i>a) conserve, restore and enhance sites and features of biodiversity interest in accordance with their status, including those identified in the Priority Habitats Inventory, local wildlife sites, woodland, veteran trees, hedgerows, roadside verges, ponds and watercourses;</i> <i>b) maintain, restore and where possible enhance the contribution of habitats to the coherence and connectivity of the Herefordshire Ecological Network, and taking into account their role as green infrastructure;</i> <i>c) ensure that proposals respect the prevailing landscape character, as defined in the County Landscape Character Assessment, including associated important views, trees and hedgerows and local features of interest;</i> <i>d) protect and enhance the setting and character of Walford, including settlement pattern, tree cover and topography.</i> Conformity noted. It is understood that the NDP will form part of the Development Plan and when adopted would ordinarily not need to cross refer to policies within the Core Strategy. The reference to Core Strategy policy LD2 within the policy is to reflect the fact that there are a range of nature conservation designations within the parish and these are afforded different levels of protection. It was felt that this needed to be covered in order that the policy met the basic condition, which we understand to have been required in other NDPs. However, given this suggestion, the other Core Strategy policies might be referred to in the supporting statement. In relation to the text provided, it is considered that the only omission from the first paragraph is reference to 'Herefordshire Council's Phosphate calculator and associated guidance' and this can easily be accommodated With regard to the detailed criteria: a) Most of these are already included in the first paragraph of the policy and those omitted can be included as well as reference to Herefordshire Biodiversity Action Plan that provides a local dimension.	

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			b) The requirement to support the Ecological Network and Green Infrastructure is already covered by the policy. However, it is noted that an extract from Herefordshire Council's network diagram covering the Parish has been required in other NDPs so should be added. c) This is already covered in policies WALF4 and WALF5 with the particular landscape types named. d) This is already covered in policies WALF4 and WALF5 with the particular landscape types named.	
	Policy WALF7		Policy is in general conformity with Core Strategy Conformity noted	No change proposed in response to this representation
	Policy WALF8		Policy is in general conformity with Core Strategy. Conformity noted.	No change proposed in response to this representation
	Policy WALF9		Policy is in general conformity with Core Strategy. Proposals should also have regard to the Strategic Flood Risk Assessment (SFRA) 2009 for Herefordshire. Conformity noted. The Environment Agency has advised that the Strategic Flood Risk Assessments carried out for Herefordshire to date did not extend to rural parishes at the NDP level and hence it is difficult to reconcile this representation with the view of the agency responsible for flood risk (see S5 below). We have used the most up-to-date information upon both flooding from rivers and from surface water published by the Environment Agency in assessing sites.	No change proposed in response to this representation
	Policy WALF10		Policy is in general conformity with Core Strategy. This policy adds little to the equivalent Core Strategy policy SD1, and largely repeats it. NDP policies are more effective acting as a localised supplement to those in the CS. If they echo the same criteria, their inclusion is not strictly necessary as the issues are already covered by existing policy. Remove <i>carbon footprint</i> of development. Rephrase last sentence first para. Where appropriate could include: a) remove physical. Last sentence is this referring to historic fabric and historic setting. Or just setting in general? b) reword point to ensure this reads better.... such as through tree planting c) <i>which are suitable for those pushing pushchairs, in a wheelchair, walking with aids or using mobility scooters.</i> Could replace this which is accessible for all. Point b and f both mention tree planting conserving energy. I think some of point b, e and f could be combined. The Code for Sustainable homes has been withdrawn in 2015. Herefordshire Council is developing an Environmental Building Standards SPD which will provide best practice recommendations to develop more sustainable schemes. Conformity noted. The policy may duplicate a number of criteria in Core Strategy policy SD1. It does, however, serve three additional and important objectives. Firstly, it contains a number of addition criteria including for example seeking integration with the surrounding neighbourhood, reducing light pollution, and promoting measures to absorb carbon; secondly, it seeks a co-ordinated package of measures so that they are undertaken in an integrated way; and thirdly and most importantly it emphasises that the local community considers the matter to be important. The policy	See change No 22

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			is similar to others that have been included in neighbouring NDPs. The form of the introductory paragraph in the policy, including the reference to carbon footprint, is similar to that of policies in other NP in the locality and found to meet the basic condition. The reason for removing 'carbon footprint is uncertain. It is a well-used and appreciated term. In relation to the points raised: a) Removal of physical is agreed. It is also agreed that the end of this criterion can be improved. b) Point accepted. c) Although such a change might be seen as making the policy more succinct, highlighting these issues recognises the particular needs of important groups. The three criteria where there is reference to tree planting are to meet different objectives that are important considerations. It is understood that until March 2015, the Code for Sustainable Homes could be mandatory in England if it was a requirement of a local authority's local plan, or where affordable housing was funded by the Homes and Community Agency. However, it was thought that the Code was still available to be used on a voluntary basis just like Passivhaus and BREEAM. Whether this is the case or not, reference to it as an option might be removed as it was only indicative of a number of schemes that might be utilised. Herefordshire Council's Standard SPD can be referred to when available.	
	Policy WALF11		Policy is in general conformity with Core Strategy. point c- rural setting and settlement character? Has the parish considered encouraging community low carbon energy generation projects? Conformity noted. The change to criterion c) is helpful. The policy would enable community low carbon energy generation projects should any be advanced.	See change No 24
	Policy WALF12		1. Policy is in general conformity with Core Strategy. 2. Reword ...point A-There is safe access onto the highway including adjacent roads? 3. Point G- conflict with vehicles-could be reworded? 4. When submitting development plans, developers need to assess the impact the proposals will have on the existing highway. This should include active modes of transport with walking and cycling the highest priority. 5. The site assessment should be related to size of the development. Large developments and/or developments which may have a severe impact on the highway should submit a Transport Assessment/Statement to meet the following criteria, Department for Transport guidance, Manual for Streets 1/2, and Herefordshire Council Highways design guidance. Early engagement on larger development through the Herefordshire Council's Pre application planning service is strongly advised. Any site which it is assessed to have its impact on the highway classed a severe should look at mitigating the impact. 6. Herefordshire Council's Core strategy highways policies associated with development are as follows: - MT1 - Traffic management, highway safety and promoting active travel	See change No 8, in relation to point 15, and No 25, in relation to points 2 and 3. No changes proposed in relation to the other matters.

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			SS4 - Movement and transportation 7. Every site should look to promote walking and cycling, this could include but it's not limited to the following, connections to existing footway/cycleways, provision of new footways/cycleways, connections to bus stops. 8. Cycle storage should meet HC guidance and should be provided to be secure, covered and individual. Businesses can also promote cycling by the provision of showers, changing facilities and lockers as well cycle storage. 9. It's advised that Town and Parish council should make available a wish list of improvement for example footways, cycleway, crossing points, bus stop upgrades which can help focus developers to what the local area needs. 10. A site of any size should be able to accommodate parking and turning within the designated site area. Parking and turning should meet Herefordshire Council design guide specifications. 11. Heavy good routes for large agricultural developments should be highlighted. 12. Tourism impacts on the highway should be mitigated against 13. Connections and improvements to the National cycle route network 14. Generally encouraging and good references to active travel but missed some opportunities to extend across policies. 15. Might be worth mentioning in background that there have been aspirations in the past to develop National Cycle Network route 44 (Shrewsbury - Cinderford) which would pass through the parish. A spur off this route to Kerne Bridge would allow connections to Bishopswood, Goodrich and Symonds Yat, offering a link in a longer Wye Valley cycle route. 16. Would have been nice to see mention of secure cycle parking provision in one or more of these sub paras too (e.g. h)	
			1. Conformity noted. 2. Criterion a) – Helpful suggestion. 3. Criterion g) – an alternative wording is suggested in response to this representation. 4. Noted. The policy sets out what are believed to be the principal impacts that need to be addressed. They include protecting the safety of pedestrians and cyclists and also supporting development proposals that create a pedestrian and cyclist friendly environment. 5. Noted. The policy requires development to be designed in accordance with Herefordshire Council's Highway Design Guide for New Developments which it is understood has been prepared with the higher-level guidance in mind. 6. Noted. It is recognised that the NDP must comply with the Core Strategy, and this will be shown within the Basic Condition Statement. 7. These requirements are covered through policies WALF10 and WALF12. 8. This requirement is covered by policies WALF10 and WALF12. 9. Policies WALF10 and WALF13 are relevant to this matter and also Appendix 1. Walford Parish Council will from time to time update this appendix and consider what further detail it can add to the current list. 10. This is covered by policy WALF12 c). 11. It is considered this matter would be covered by Policy WALF12 d). 12. This would be covered by policy WALF12. 13. This would be covered by policy WALF12 i)	

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			14. There is no need to duplicate policy requirements through the NDP and Examiners tend to remove this where it occurs unnecessarily. Hence the provisions in policies WALF10 and WALF12 will apply to all relevant forms of development. 15. Noted. Reference can be added. 16. Storage for bicycles is referred to in Policy WALF10 a) and there is no need to duplicate this requirement in other policies.	
	Policy WALF13		Policy is in general conformity with Core Strategy Conformity noted	No change proposed in response to this representation
	Policy WALF14		Policy is in general conformity with Core Strategy Suggest 'e) They include measures that encourage and promote active travel to and from <u>and at</u> the facility. (e.g. <u>secure cycle parking</u>)' Conformity noted. Storage for bicycles is referred to in Policy WALF10 a) and there is no need to duplicate this requirement in other policies.	No change proposed in response to this representation
	Policy WALF15		Policy is in general conformity with Core Strategy Conformity noted	No change proposed in response to this representation
	Policy WALF16		Policy is in general conformity with Core Strategy Conformity noted	No change proposed in response to this representation
	Policy WALF17		Policy is in general conformity with Core Strategy although there is concern that criterion j) is contrary to policy. Would have been nice to see mention of secure cycle storage / parking provision here too (to be consistent with WALF10 para a). Conformity noted. Herefordshire Local Plan Core Strategy was adopted in 2015 in compliance with NPPF (2012). There have been a number of revisions to the NPPF since then. NPPF (2018) included a new provision that a lower threshold of 5 dwellings could be included in plan policies as the figure where affordable housing could not be required within 'designated rural areas'. AONBs are included in the definition of 'designated rural areas. The Core Strategy was adopted before this provision was included in the current NPPF and is therefore out of date in that regard. Furthermore, Core Strategy policy H1, which is most relevant, is expressed positively and does not explicitly restrict any reduction from 10 within designated rural areas. Walford NDP does not propose any large sites and although it is thought most will be for 5 or less dwellings, it may be that this threshold could be exceeded by building a number of small dwellings rather than larger ones on any site. The local need for affordable housing is indicated to be small if any, although the evidence is old. Nevertheless, this policy affords the opportunity to provide such housing as may be needed at the time of any proposal. It also provides for reduced provision should the evidence suggest otherwise. Another consideration is the target of 460 affordable	See change No 27

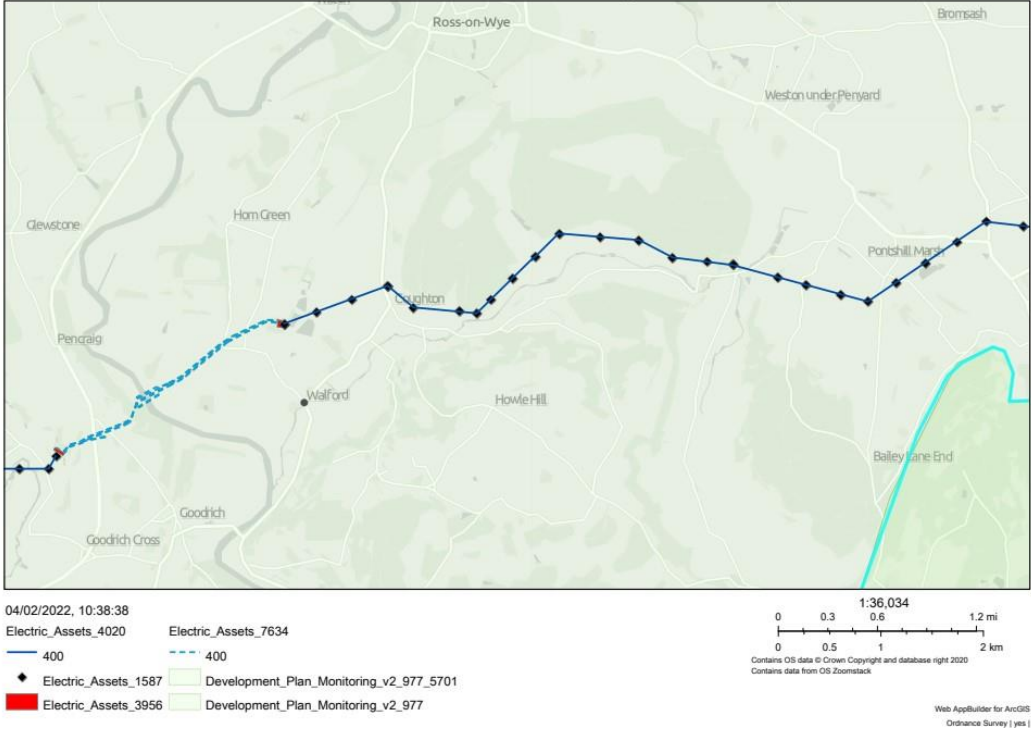
Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			dwelling for the rural parts of Ross-on-Wye Housing Market Area (Herefordshire Local Housing Market Assessment 2012). Unfortunately, Herefordshire Council's Annual Monitoring Statement does not present figures for affordable housing based on Housing Market Areas. Anecdotal evidence suggests many of the sites advanced within the rural parts of this Housing Market Area are below the 11-dwelling threshold where affordable housing would be required. Although not all of the Parish falls within the AONB, its three settlements do, although Howle Hill sits on its edge. A change is proposed to indicate that the provision within the policy refers to that part falling within the AONB. Storage for bicycles is referred to in Policy WALF10 a) and there is no need to duplicate this requirement in other policies.	
	Policy WALF18		Policy is in general conformity with Core Strategy. The absence of allocations at Coughton and Walford is unusual given that these are arguably the most sustainable locations for growth given the presence of a school, public house and local employment sites. The apparent lack of allocation in Walford and Coughton which don't seem to be fully qualified. Remove restricted negative wording...will support sensitive infilling? Conformity noted. A change is proposed to present the policy in a positive way.	See Change No 28
	Policy WALF19		Policy is in general conformity with Core Strategy. Remove restricted negative wording...will support sensitive infilling? Conformity noted. A change is proposed to present the policy in a positive way.	See Change No 29
	Policy WALF20		Policy is in general conformity with Core Strategy. The NDP does not reference the existing permissions that are located around the crossroads between the 2 identified settlement boundaries. There are approx. 12 additional properties here and it doesn't seem logical not to include these sites within a 3-settlement boundary for Howle Hill? Remove restricted negative wording...will support sensitive infilling? Conformity noted. The planning permission granted for the site is noted. The Parish Council finds itself in a difficult position in relation to defining a third cluster close to the settlement boundary as a consequence of the two recently granted planning permissions in that it is aware of a number of other potentially conflicting planning decisions in this area, including planning appeals. More importantly it is aware that planning permission 172215/O was granted for two market dwellings and 2 affordable dwellings, with the latter being an important consideration. It is understood that an agreement under S106 has been granted for the provision of the two affordable dwellings and the only policy basis for such a decision is understood to be under NPPF paragraph 78 which provides for rural exception sites that will provide affordable housing to meet identified local needs and allows some market housing on these sites to help to facilitate this. Consequently, should the site be included within a settlement boundary it would afford the opportunity for a new planning permission to be granted that would exclude the affordable housing element. The approach considered most appropriate is to wait until development is substantially complete before reviewing the settlement boundary. In this way, it should provide a high degree of certainty that the affordable housing will be retained. Should development of the site proceed swiftly, the NDP Examiner might be advised to include this site within a settlement boundary prior to referendum. Should development proceed more slowly, it might await a review of the NDP which would be expected following the review of the Core Strategy. This should be explained within the	See Changes No 30 to 33

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			NDP. A new cluster might, however, be defined as suggested (3 settlement boundary) to incorporate one of the planning permissions (larger site) and 1/2 Crossways.	
	Policy WALF21		Policy is in general conformity with Core Strategy Conformity noted	No change proposed in response to this representation
	Policy WALF21(a)		The site has historically been used as orchards. 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. The issue of contaminated land is covered by policy WALF10 (g)	No change proposed in response to this representation
	Policy WALF21(b)		A review of Ordnance survey historical plans indicates the proposed site appears to have had no previous historic potentially contaminative uses. Noted	No change proposed in response to this representation
	Policy WALF21(c)		The site has historically been used as orchards. 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. The issue of contaminated land is covered by policy WALF10 (g)	No change proposed in response to this representation
	Policy WALF21(d)		Our records suggest that the proposed development is located within 250 metres of the former landfill site (Vine tree Farm). The site's potentially contaminative use would therefore require consideration prior to any development. The issue of contaminated land is covered by policy WALF10 (g)	No change proposed in response to this representation
	Policy WALF22		Policy is in general conformity with Core Strategy Would have been good to see measures that support and promote active travel to work here too (to be consistent with WALF10 para a) Conformity noted. There is no need to duplicate this requirement because policy WALF10 para-a) will apply to all relevant development.	No change proposed in response to this representation
	Policy WALF23		Policy is in general conformity with Core Strategy Conformity noted	No change proposed in response to this representation
	Policies Maps		Proposed sites in NDP should be labelled on maps with clear IDs to help with referencing and identification. Herefordshire Council should be asked to number the sites in accordance with its recent practice for the Regulation 15/16 plan.	See Change No 38
	Appendix 1		Under Enabling Associated Measures 1. c) Promotion of cycling and defining cycle routes. (Not sure what 'defining' means here, would developing, or establishing be better?) 2. Suggest in d) Measures to support the use of public transport such as bus shelters, add secure cycle parking at strategic	No change in relation to point 1. See Change No 39 in relation to 2 and 3

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			<i>stops to extend the reach of bus services.</i> 3. In Parish Projects suggest: <i>Promote the use of <u>active and</u> public/community transport as an alternative to private car use.</i> 1. Currently there are no cycle routes defined (either developed, proposed or indicated by waymarking) within the parish. The term has been used to cover the range of measures needed to promote cycling for active travel and recreation. 2. Useful suggestion 3. Useful Suggestion	
S.2 Welsh Water Dwr Cymru (Statutory Consultee)	Whole plan, SEA, AA	No comments received	No comments received It is therefore assumed that it is content with the NDP.	No change proposed
S.3 Historic England (Statutory Consultee)	Whole Plan (primarily historic environment)	Support	Historic England is supportive of both the content of the document and the vision and objectives set out in it. We particularly commend the thorough approach taken to identifying the distinctive local characteristics of the varying settlements of the Parish and the emphasis placed on the conservation of their local distinctiveness through good building design. The protection of locally significant buildings, farmsteads and landscape character including archaeological remains and important views is equally to be applauded. The plan has an extremely sound evidence base that includes reference to the Herefordshire Council Historic Environment Record and County Landscape Character Assessment, and it reads as a well-considered, concise and fit for purpose document which we consider takes a suitably proportionate but very thorough approach to the historic environment of the Parish. Beyond those observations we have no further substantive comments to make on what Historic England considers is a good example of a community led plan. Noted with thanks	No change proposed as a consequence of this representation
S.4 Natural England (Statutory Consultee)	Whole plan, SEA and HRA	No comments received	No comments were received It is therefore assumed that it is content with the NDP.	No change proposed
S.5 Environment Agency (Statutory Consultee)	Whole Plan	Comment	As part of the adopted Herefordshire Council Core Strategy updates were made to both the Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS). This evidence base ensured that the proposed development in Hereford City, and other strategic sites (Market Towns), was viable and achievable. The updated evidence base did not extend to Rural Parishes at the NDP level, so it is important that these subsequent plans offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate	No change proposed as a consequence of this representation

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			growth for the duration of the plan period. Herefordshire Council are shortly to begin the Local Plan review process including updates to the evidence base.	
			Comment noted. There are a limited number of sites allocated for development and these are for housing. These do not fall within the area indicated as flood-risk zones 2 or 3. Development proposals coming through locationally unspecific policies will be required to comply with NDP policy WALF9 and Herefordshire Local Plan policy SD4. There is no public wastewater treatment works serving the settlements of Bishopswood or Howle Hill. The two northern-most clusters of Walford and Coughton are served by a public sewer and Ross Lower Cleeve WwTWs. It is understood that works have recently been completed to the WwTWs to rectify a shortfall in capacity. Policy WALF8 requires it to be shown that wastewater drainage can be accommodated to avoid pollution whether this be via the public sewer or other means.	
	Whole Plan	Comment	Confirms that, in the absence of specific sites allocated within areas of fluvial flooding, would not offer a bespoke comment at this time. It should be noted that the Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with the drainage team at Herefordshire Council as the Lead Local Flood Authority (LLFA).	No change proposed as a consequence of this representation
			Comments noted. Herefordshire Council, as the LLFA, has been consulted on the draft NDP, and has not commented on this matter. Grateful for the advice that all the sites are located in SPZ1.	
	Appropriate Assessment under the Habitats Regulations		It is noted that Walford falls within the Lower Wye catchment area and, although this area is not failing its water quality objectives at present, an AA has been undertaken in light of recent comments from Natural England (NE). As confirmed within the AA document the most significant issue within the River Wye SAC Catchment (included the River Lugg) relates to water quality and the potential impact of policies and site allocations within the NDP's. NE are the primary statutory consultation body for AA's and, ultimately, they would need to be satisfied that there is reasonable certainty to take forward the Policies and site allocations in the NDP in discussion with Herefordshire Council. We have previously provided comment on similar NDPs' with a view to ensuring a robust submission and that development can be achieved without impact on the integrity of the SAC, primarily within the Lugg Catchment. In this instance, as stated above, Walford falls in the Lower Wye Catchment and in an area that is not currently failing its water quality objectives. Therefore, we would raise no concerns at this time.	No change proposed as a consequence of this representation
			Comment noted. Natural England has been consulted upon this NDP and the Appropriate Assessment. Policy WALF8 provides protection in the event that the Lower Wye sub-catchment may fail to meet its quality objectives in the future.	
S.6 Highways Agency (Statutory Consultee)	Whole plan, SEA and HRA	No comments received	No comments were received make.	No change proposed
			It is therefore assumed that it has no adverse comments	
S.7 Herefordshire	Policy WALF16	Support	Welcome the policy promoting improved broadband and telecommunications infrastructure which is of benefit to the provision of healthcare into rural communities.	No change proposed as a consequence of

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
and Worcestershire Clinical Commissioning Group			Advice is very helpful and noted	this representation
S.8 National Grid	Whole Plan	Comment	The following National Grid assets fall within the Neighbourhood area boundary • 4YU ROUTE TWR (001 - 078): 400Kv Overhead Transmission Line route: • PEMBROKE – WALHAM Electrical Substation: • WALFORD 400KV CABLE COMPOUND 400Kv Underground Cable route: RASSAU – WALHAM The plan below (for illustrative purposes only) details of National Grid's assets. National Grid encourages high quality and well-planned development in the vicinity of its assets. General advice and guidance on development in proximity to its assets is given. That most pertinent relates to electricity assets. Sites crossed or in close proximity to National Grid assets such as overhead lines should be retained in-situ, unless there are exceptional circumstances such as proposals of regional or national importance. Guidelines are available for development near pylons and high voltage overhead power lines, including those crossed by existing overhead lines, demonstrating that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed.	No change proposed as a consequence of this representation

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			Herefordshire Council - Walford NP Reg 14 - Asset Map  Noted with thanks. Currently the NDP does not propose any development that might affect the assets identified by National Grid. It is understood that Herefordshire Council will consult National Grid should any proposals arising from plan policies that are not specific in terms of location should these arise close to or otherwise affect National grid's assets. A number of submitted sites would have affected this line although National Grid's guidance was used to determine the extent of the sites that might be available should they be chosen for inclusion in the NDP. NB National Grid has been advised that there is another high voltage power line that passes through Coughton which does not appear on the map it has provided, asking whether it would be possible the clarify why it appears to have been omitted.	
S.9	Policy WALF2	Recommends	The housing area allocated within the Bishopswood Settlement area totals 1 .90 Ha plus another 0.45 Ha site near the	No change proposed

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
Wye Valley Association		change	southern Ross on Wye boundary, potentially making provision for 16 dwellings. We believe that the plot adjacent to the southern boundary of Cedar Grove, (not included in the Walford/Coughton Settlement boundary) should have been utilised as it is alongside the B4234, has access to mains drainage is close to the Primary School and bus stops and appears to have relatively level ground ... it is currently in agricultural use. In determining the approach to allocating housing sites, significant weight was given to utilising small sites compared to medium and large sites whereas that submitted to the south of Cedar Grove was considered to be of too great a scale.	as a consequence of this representation
	Policy WALF5	Recommends change	The protection of valuable views within the AONB is commended but the Wye Valley Society but stresses that views in and out of the setting of the Wye Valley AONB should also be protected. The views from the high ground, footpaths, the road and the dwellings in Deep Dean are adversely affected by the mass of polytunnels (existing with more planned) and the mobile homes in the foreground in the Castlebrook Valley. These structures adversely affect the views of the Penyard Hill beyond. Policy WALF4 b) refers to the need to conserve and enhance the special landscape qualities of Wye Valley AONB and its setting.	No change proposed as a consequence of this representation
	Policy WALF6	Comment	It is stated that the Parish is within the 'Lower Wye Catchment area'...the boundary of this area is not clear. Core Strategy Figure 5.4 identifies the sub-catchments within the County. However, it does not divide the Wye Sub-catchment into an upper and lower although it is understood that it is separated for the purposes of differentiating between areas assessed in terms of water quality, with the point of separation being just below Hereford at the River Wye's confluence with the River Lugg. This might usefully be clarified through a footnote.	See change No13
	Policy WALF10	Recommends change	Specifically establish footways alongside the B4234 through the Parish and where possible on C roads in the Parish. The provision of new or improvements to existing footpaths along existing roads would be a matter for discussion with Herefordshire Council as Highway Authority. The intention of Policy WALF13, which is consistent with Core Strategy policy SS4, is to promote such measures. However, it depends upon Herefordshire Council's works programmes.	No change proposed as a consequence of this representation
	Policy WALF14	Recommends change	Consideration could be given to providing a football pitch on the grassed area belonging to Walford Village Hall. The current status of the grassed area belonging to Walford Village Hall is unknown, but it may not even need planning permission to be used as a playing field. It appears to be approximately 50m square although already contains a children's play area. As such it may not meet the size requirement for organised junior football (minimum 36m x 27m for under 7's and 8's – 5 a side). Another similar sized grassed play area is located just inside the parish boundary adjacent to Ross-on-Wye settlement boundary. Policy WALF14 supports the provision of such a facility, or any other form of play or recreation area, where there is a need and a suitable location identified. Should there be a need, it is suggested that Herefordshire Football Association be approached for assistance and potential options to meet the particular need identified.	No change proposed as a consequence of this representation
	Policy WALF18	Recommends change	The comments above note that it is felt that land adjacent to the Cedar Grove houses should have been included in a settlement boundary.	No change proposed in response to this

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			In determining the approach to allocating housing sites, significant weight was given to utilising small sites compared to medium and large sites whereas that submitted to the south of Cedar Grove was considered to be of too great a scale.	representation
	Policy WALF20	Comment	Howle Hill has no services at all so should not be considered for further dwellings. Howle Hill is identified by Herefordshire Council in its Core Strategy as a settlement where new housing development might take place and Walford Parish Council is not able to challenge this following the adoption of that plan. So far, the amount of new housing permitted in Howle Hill has been determined by Herefordshire Council and the Planning Inspectorate under broadly based policies. Defining settlement boundaries within the NDP will have a greater influence over the level of development that might take place within the Parish's three settlements, and this is what is proposed, bearing in mind the required level of housing that it is required to accommodate. A number of factors have been used to determine which available sites are included in the NDP and the preference for small sites was given significant weight.	No change proposed as a consequence of this representation
	Policy WALF23		Polytunnel Proposals: The large polytunnel development to the west of the parish is within the AONB on the river plain and was permitted against the AONB's stated aim of protecting this designated area. The large scale polytunnels established above and below the Castle Brook Stream, associated with Coleraine Farm, are just outside the AONB boundary but present unattractive views to the north from the high ground at Deep Dean. This Policy should be strengthened to prevent further large scale, cumulative polytunnel development. Currently the polytunnel developments within the Parish were approved without the need to consider an explicit policy for polytunnel developments. Policy WALF23 is included within the NDP to rectify this. Criterion b) within the policy indicates that cumulative effect should be a material consideration.	No change proposed as a consequence of this representation
	Whole Plan		The aims for the protection of the Wye Valley AONB area within the Parish are commended in this document but the Wye Valley Society stresses that the landscape/open countryside within the setting of the AONB is also valuable and should be protected from inappropriate, large-scale development. As indicated above policy WALF4 b) refers to the need to conserve and enhance the special landscape qualities of Wye valley AONB and its setting.	No change proposed as a consequence of this representation
	Appropriate Assessment		There are a significant number of misspellings, typos, missed words, incorrect construction in sentences and incorrect information. It is difficult to detail these as the pages are not numbered. These corrections are necessary before the final version is drafted. Noted. These will be drawn to the attention of Herefordshire Council where they have been identified.	No change proposed to the NDP in response to this representation. Comments to be passed to Herefordshire Council.
S.10 CPRE	Whole Plan	Comment	Can I congratulate all those involved in producing this very thorough Plan which demonstrates both great knowledge of, and commitment to your parish? Noted with thanks	No change proposed as a consequence of this representation

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
	Whole Plan	Comment	We see Neighbourhood Plans as a way to protect all that is best in rural landscapes and would hope that every rural plan would contain where relevant, policies designed to: • Identify and stipulate ways of protecting unique characteristics of the area eg 'dark skies', tranquility, distinctive landscapes and settlement patterns • Protect the broad sweep of landscapes • Ensure that any development does not adversely affect the environment in terms of noise, air, water or light pollution • Encourage design which enhances local landscape and settlement character • Protect important views and • Address inappropriate locations for development including: - housing, - industrial scale energy generation and - economic activity (e.g. intensive livestock farming units and large scale polytunnels). You have addressed most of these key issues. The NDP contains policies that cover all of the areas indicated.	No change proposed as a consequence of this representation
	Policy WALF11		You may take the view that you would give support to solar farms only if they demonstrably benefit the community and you may wish such development to be on brown field sites or roof mounted and suggest that the use of agricultural land, particularly high grade land, is inappropriate. The policy encourages the range of renewable and low carbon energy forms where they serve local needs – individuals, the local community and local businesses, with specific reference to scale. These are considered the community. To indicate that provision is restricted to these may conflict with the requirement to frame policies positively. The need to protect the best and most versatile agricultural land is an important issue that should usefully be referred to both in relation to renewable and low carbon energy generation and more widely. Changes are suggested to accommodate this.	See Changes 9 and 24
	Policy WALF23		Addresses polytunnels. You may wish to include or make separate specific reference to Intensive Livestock Units. Planning applications for such units can cause considerable controversy within small communities. There is no history of proposals for Intensive Livestock Units within the Parish although they cannot be ruled out. However, should such proposals be advanced, it is considered there are other policies in the NDP that should be relevant to protect the landscape, residential amenity, adverse traffic generation and pollution to air and water.	No change proposed as a consequence of this representation
	S.11 Ward Councillor	Recommends change	Could 296 respondents be shown as a % of current residents in the parish? This would present some difficulty in terms of whether you would present the proportion based on households/adult population/whole population. There was no attempt to restrict who might wish to respond to the questionnaire and hence there is no certainty about whether households or individuals in each household responded. The information gathered also needs to be seen within the wider context of other surveys and comments received during the preparation of the NDP. Information setting out consultation undertaken upon the NDP will be included in a Consultation Statement prepared for the next formal consultation stage of preparing the NDP.	No change proposed in response to this representation
	Para 2.3	Question	Is the post office in the settlement boundary of Bishopswood?	No change proposed

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			The post office is located at Wyese Caravan Park at the eastern end of the Parish and not within Bishopswood's settlement boundary. Policy WALF14: Protection and Enhancement of Community Facilities and Businesses serving the Local Community - will be relevant to the protection of this facility and proposals for any new such facilities.	in response to this representation
	Para 2.15	Question	Did Howle Hill have more than one chapel? The advice on history of the parish was provided by individuals with significant local historical knowledge. Policy WALF7 will be relevant should any properties be identified as former chapels of local historic interest. Should they be of local interest, then they might usefully be advised to Herefordshire Council's Archaeological section for inclusion in the Historic Environment Record if they have not already been so advised.	No change proposed in response to this representation
	Para 2.27	Recommends change	Could the WPC advocate for more tree planting around this part of the parish, e.g. Castle Brook to the Old Vicarage? This section identifies the current character of the settlements. The planting of trees does not require planning permission although they can be sought as mitigation and/or biodiversity net gain measures in association with development. The NDP does not propose development in areas that border Castle Brook and hence the opportunity to seek planting along the brook through the NDP is not available. WPC could approach relevant landowners to see whether they might wish to undertake tree planting in the areas suggested, including utilising funding that may be available from various public authorities and agencies, although this would be separate to the NDP. Policies WALF4 and WALF6 would be relevant where trees may need to be protected from the effects of development and/or new planting required in association with development.	No change proposed in response to this representation
	Para 2.33	Recommends change	Typo – remove 'd' after cottages on third line of the paragraph Many thanks for identifying this typo.	Typo corrected
	Policy WALF3. Para 3.3	Question	Is there a reason why major development has not been defined in the NDP? There is no definition of 'major development' (see NPPF Footnote 60). Policy WALF3 in the NDP identifies the characteristics that should influence nature, scale and setting when determining whether a proposal amounts to major development. It needs to be appreciated that there are many forms of development, and their impacts may vary according to location. Much research was undertaken to identify whether other plans have been able to be more specific and the approach taken in this NDP appears to go further than any of those identified elsewhere.	No change proposed in response to this representation
	Para 3.13	Recommends change	Would WPC reconsider the Walford Links Project? Rather than having a cycle path – to have a bridleway instead (less bureaucracy) so children can access primary school from Ross-on-Wye? It would be unusual to use the NDP as a mechanism to create a new link between Ross-on-Wye and Walford Junior School unless associated with development. Other legislation (such as the Highways Act) would normally be utilised to bring forward such a proposal. Should it be proposed that one be included in the NDP then funding would need to be put in place and relevant landowners consulted. There has been no suggestion one should be included in the NDP. Should this change, it would be expected to lead to a significant delay in adopting the NDP. However, should one be proposed that involves development requiring planning permission then policies WALF12 or WALF13 might be utilised	No change proposed in response to this representation
	Objective 5	Question	This focuses on walking and cycling as main active travel. Is there a reason for not mentioning horse riding, mobility scooters, pushchairs ...? Walking and cycling are used in the generic sense as the main focus as means of active travel (see NPPF paras104 and	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
			112). Mobility and pushchair requirements are normally encompassed under the heading of walking where Herefordshire Council's standards seek to ensure provision that will accommodate their needs. Policy WALF10 refers to the need for new development to be pedestrian friendly with links provided that are suitable for those pushing pushchairs, in a wheelchair, walking with aids or using mobility scooters. Horse riding is not usually considered as an alternative means to vehicles in terms of active travel to day-to-day activities.	
	Policy WALF2	Question	What are the implications for the NDP if/when any of the settlement areas are reclassified in the new Core Strategy? The implications will depend upon what changes are made to the Core Strategy. The NDP must comply with the adopted Core Strategy. Should there be a significant change in approach then the policies in any revised Core Strategy will supersede those in the current one upon which the NDP must be based. It is understood that the review of the Core Strategy has only just commenced, and it is likely to be some time before a new one is adopted given the consultation requirements and need for a public examination. NDP paragraph 9.5 describes the action to take in the event that the NDP is found to be out of date.	No change proposed in response to this representation
	Policy WALF9	Recommends change	Could the need for comprehensive drainage report with percolation tests be included in this section ... to ensure any site on the Hills does not cause flooding in other properties or pollute the tributaries/River Wye? Could riparian ditch responsibilities be included here? Storm/surface water flooding is recognised as a significant issue affecting properties within the parish and it is noted that Herefordshire Council's drainage consultant recently sought evidence such as that suggested to inform its advice upon a planning application. Consequently, the need for appropriate information, such as that which might require a percolation test, might be highlighted. There may be other forms of evidence that would inform the potential effects of development on surface water flooding and consequently a more general requirement for evidence might be stipulated with percolation tests being an example. The clearing of ditches is not a matter that can be covered in the NDP and should be pursued through other means.	See Changes No 20 and 21 No change is proposed in relation to the matter of ditch clearing.
	Policy WALF10 (h)	Recommends change	Include all external lighting is Dark Skies compliant here (and link to WPC Environmental policy)? The meaning of 'Dark Sky compliant' is uncertain and there are limits upon the ability of the NDP to promote 'Dark Skies' given lighting only requires planning permission in limited circumstances and there can be good safety reasons for its provision. Policy WALF10 seeks to address the issue so far as it is possible although it might be explained further.	See Change No 22
	Policy WALF12 (f) and (h)	Question	This section focuses on walking and cycling as main active travel. Is there a reason for not mentioning horse riding, mobility scooters, pushchairs ...? Walking and cycling are used in the generic sense as the main focus as means of active travel (see NPPF paras104 and 112). Mobility and pushchair requirements through development is normally encompassed under the heading of walking where Herefordshire Council's standards seek to ensure provision that will accommodate their needs. Policy WALF10 refers to the need for new development to be pedestrian friendly with links provided that are suitable for those pushing pushchairs, in a wheelchair, walking with aids or using mobility scooters. Horse riding is not usually considered as an alternative means to vehicles in terms of active travel to day-to-day activities.	No change proposed in response to this representation

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	Policy WALF14	Comment	Residents travel to Hereford or Gloucester to access local hospital care (Minor Injury Unit in Ross was closed by Wye Valley Trust) and children & families access schools (and primary care services) in Forest of Dean and Monmouthshire in addition to Herefordshire Noted. The NDP can only cover matters within Walford parish.	No change proposed in response to this representation
	Policy WALF16	Recommends change	Link to supporting Rural Businesses (Rural Economy) and Home Working? Reference to these aspects can be added in the Policy's supporting statement.	See Change No 26
	Para 7.4	Recommends change	Type 'UDP' in brackets after Unitary Development Plan Helpful suggestion	UDP added as suggested
	Policy WALF21 and paras 7.12 and 7.15	Question	Would WPC consider putting 'blanket TPOs' on ancient woodlands in the parish? Walford Parish Council does not have the power to make TPOs. This can only be undertaken by Herefordshire Council. They are usually made where a tree/trees/woodlands are under threat. Herefordshire Council has a duty to consider whether a tree has amenity value and should be protected by a TPO whenever a tree is affected by development requiring planning permission. This aspect is covered by policy WALF4. Some protection is available to woodlands above a certain size through Felling Licence requirements.	No change proposed in response to this representation
	Paragraph 8.1	Recommends change	Would WPC consider using the words – encourage regenerative farming practices in the parish? It is understood that Regenerative Farming is one that aims to reduce pesticide use, move away from grain to grass-fed livestock, and restore soil fertility and biodiversity. These do not comprise development requiring planning permission and hence do not fall under the Planning Act. As such they are not matters for the NDP. It has yet to be determined whether the Parish Council wishes to encourage such farming, yet should it do so as part of its environment policy, Herefordshire Council might be encouraged to include such encouragement within a Local Nature Recovery Strategy which it is expected to be prepare. The identification of the need for allotments is indicated as an associated measure that might be undertaken in parallel with the NDP (see Appendix 1 - para-A1.1).	No change proposed in response to this representation
	Para 8.5	Recommends change	Light and noise pollution needs to be included here alongside water Light and noise pollution fall under the general heading of amenity and policies WALF10 (criteria h and l), WALF12 (criterion l); and WALF17 (criterion f) - some are to be amended to make this more explicit.	See Changes 22 and 27
	Policy WALF22	Recommends change	d) include noise and light pollution include (i) have high spec energy specifications. Many rural buildings that are renovated under permitted development have poor energy ratings because of poor insulation. Noise and light pollution are covered by reference to residential amenity and the form of criterion d) follows advice from Herefordshire Council's Environmental Health Officers (see response to the previous representation). The need to provide the highest possible energy conservation measures is covered by policy WALF10 which would apply to all relevant forms of development including rural buildings converted to employment use. It is also a matter that is covered by Building Regulations so the NDP can currently have a marginal impact through encouraging a higher standard than that set out nationally. Where works are undertaken through permitted development, the NDP cannot influence renovation standards.	See Changes 22 and 27 No change proposed in relation to energy specification.
	Policy	Recommends	Green Infrastructure Principles to be applied within the footprint	See change No 13

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
	WALF23	change	A definition of Green Infrastructure might usefully be included, and a link provided to Natural England's Green Infrastructure Principles. This is best located following policy WALF6 which would apply to this form of development, among others.	
	Para 9.7	Recommends change	Include noise and light pollution Para 9.7 is a precursor to the list of measures and projects to be pursued by the Parish Council indicated in Appendix 1. No measures or projects covering noise and light pollution have been listed. Both matters are, however, covered by policies in the NDP as advised under a number of representations above.	No change proposed in response to this representation
	Appendix 1	Recommends change	a) Include 'create wildlife corridors' h) Include 'consider whether night-time lighting is necessary'. All external lighting is Dark Sky compliant Appendix 1 comprises lists of measures and projects that the parish council would like to advance should resources be available. Wildlife corridors is a broad and unspecific term and elements might comprise trees and other elements of green infrastructure. A number of specific features that would add to the local network of wildlife corridors and stepping-stones are already identified in the lists of measures and projects. Policy WALF6 seeks to add to the existing network where development is proposed. The term Dark Sky compliant is understood to mean keeping the amount of light required to a minimum and that required for safety, cutting down on energy waste and ensuring lighting is shielded to point downwards. It is felt these are covered by measure i) in the list of Measures.	No change proposed in response to this representation
	Appendix 1 Parish Projects	Recommends change	For sites over 10+ housing – to consider 'agrihoods' as an eco-village/sustainable living design principle No sites of 10+ houses are proposed within the NDP. Research suggests that Agrihoods appear to be an American concept where community farms or gardens are built as a focus within the development. The purpose is to facilitate food production as well as provide green space, recreation, aesthetics and value for the particular community being created. It may be similar to the approach of promoting green infrastructure which comprises a multifunctional range of open spaces. Encouraging green infrastructure to provide for the whole community is provided through policy WALF6. A number of measures or projects are identified in Appendix 1 such as allotments, community woodlands and orchards, and promoting self-sufficiency, and it would seem that these would fit well within the concept promoted for Agrihoods. Should they require planning permission (and this would often not be the case) a number of policies might apply, particularly policy WALF14.	No change proposed in response to this representation
	Appendix 3	Recommends change	Woodlands, p. 79 – include 'including hedgerows which are mini forests' Orchards p. 79 – why not include privately owned orchards such as one on Howle Hill? I'm sure there must be others in the parish? Historic sites, p. Howle Hill camp? The appendix is included to define the nature, scale and setting of the respective areas in order to inform decisions	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
			about what might comprise ‘major development’ in those locations. They comprise characteristics highlighted in the Wye Valley AONB Management Plan and hence have a provenance that decision makers will recognise. It is hoped that as a consequence, these will be given significant weight in decision making. Hedgerows and orchards are specifically protected where appropriate through policy WALF4 (the latter also through policy WALF6). Great Howle Camp is specifically protected through policy WALF7.	
	Whole Plan	Comment	I want to congratulate the NDP Team with its Consultant for publishing an easy-to-read comprehensive NDP. The NDP journey has been a longstanding one, so it is to be celebrated that Walford Parish Council has arrived at this stage. Well done to all! Noted with thanks	No change proposed in response to this representation
	S106 Monies	Comment	I am aware a significant number of local people in the parish want infrastructure to be put in place to mitigate traffic issues at Leys Hill Junction (opposite Bishopswood Village Hall/Kerne Bridge Canoe Launch). This infrastructure could be funded by S106 funding from a housing development of more than +10 houses in Walford/Coughton settlement. Therefore, it is a shame Walford Road (SR11) was not accepted as a suitable site by the WPC and residents of Walford parish for a development of +10 houses. I understand there was local opposition from those living in the neighbouring housing estate next to SR11 but – when looking at the overall balance in planning terms - I believe it is a missed opportunity to obtain the much needed S106 funding for the Leys Hill Junction which will benefit not only those who live on Leys Hill but those who access Bishopswood Village Hall and Kerne Bridge Canoe Launch as well as commuters, tourists and visitors to/from the parish and those who travel from neighbouring parishes. Walford/Coughton is the only large settlement in the parish. SR11 is a sustainable site that is close to mains drainage, is on a public transport route, is close to the primary school and could have offered a range of housing including bungalows and affordable housing units to meet the growing and changing demographic needs of the parish. The comment is noted but other considerations were given greater weight. Herefordshire Council’s Planning Obligations SPD indicates that developer contributions can be sought towards road safety improvements although it is understood these are usually made through S278 of the Highways Act. However, such improvements to the existing highway should be those necessary to mitigate the impact of the development on the public road network. It would be difficult to prove that development of site 11 will have a direct impact upon the Leys Hill junction.	No change proposed in response to this representation
	Additional matter	Recommends change	I was wondering if it is possible to include the ‘Green Infrastructure Principles’ in a Glossary at the back of the NDP? I see the term ‘green infrastructure’ is peppered throughout the document, but I think it would be beneficial for many to actually see/read what is meant by Green Infrastructure. The suggestion to include a definition for green infrastructure would be useful. Natural England has set out a series of Green Infrastructure Principles although this is quite a lengthy document so a link to where these can be found might be provided.	See Change No 13