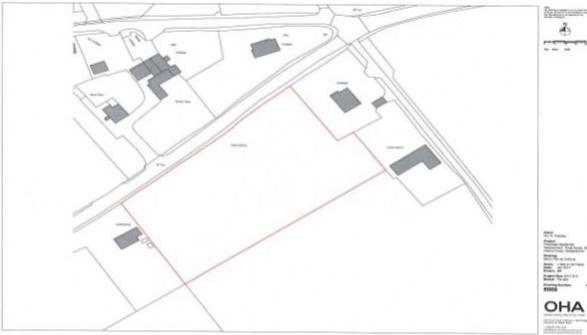


**First Regulation 14 Consultation - 6 Feb 2017 - 20 March 2017**

**Table 4 Landowners / Developers Comments**

<b>Respondent Identification Number</b>	<b>Section/ Policy Number</b>	<b>Support/ Object/ Comment/</b>	<b>Representation</b>	<b>PC Consideration</b>	<b>Changes to NDP</b>
1.1	Site allocations	Comment	<p>Client suggests that land south of the B4521 (see plan attached edged in red) be allocated in the Neighbourhood Plan in order to help meet housing need and to assist in meeting some of the aspirations set out in the Neighbourhood Plan.</p> <p>Our comments are made in the context of the basic conditions that the Neighbourhood Plan must meet as set out in paragraph 8 (2) Schedule 4B of the Town and Country Planning Act 1990, and as summarised in the National Planning Practice Guidance (provisions quoted). Relevant planning guidance requires the Neighbourhood Plan to support the Strategic Development needs set out in the Local Plan and plan positively to support local development (PPG 004). Proportionate and robust evidence should support the choices made and the approach taken in the Neighbourhood Plan. On housing supply, Neighbourhood Plan policies should take account of the latest and up to date evidence of housing need. Policies must be clear and unambiguous. In relation to allocations of housing land, there must be evidence of an appraisal of options and an assessment of individual sites against clearly identified criteria.</p>	<p>Noted.</p> <p>The NDP Review will reconsider site allocations.</p> <p>All submitted sites to the updated call for sites process will be assessed and any preferred sites will be subject to further public consultation.</p> <p>The NDP Review will focus new development in the 3 settlements identified as suitable for housing growth in the Core Strategy.</p>	No change.

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/	Representation	PC Consideration	Changes to NDP
					
1.2	<u>THE VISION</u>	Support	We broadly support the proposed vision and agree that policies should be aimed at creating vibrant sustainable rural communities, providing a high quality of life for people who live, work and visit the parish and that among the other matters, there is availability of different types of housing for all sectors of the community within Llangrove, Llangarron, Llancloudy and Three Ashes. Our representations support this objective, specifically for Three Ashes.	Noted.	No change.
1.3	<u>THE OBJECTIVES</u>	Support	We broadly support the Neighbourhood Plan objectives. However, we have concerns relating to subsequent policies which may impact on the objectives stated, in particular our objections will deal with the policies specific to location of new dwellings.	Noted.	No change.
1.4	<u>CLAUSE 5.0 PLANNING POLICIES</u>	Object	We object to the Neighbourhood Plan on the basis that the policies identified have not been developed in the context of the National Planning Policy Framework and the emerging Core Strategy for Herefordshire.  Specifically, we object to the housing numbers policy, restriction of development in the RA2 settlements to single dwelling plots, and the identification of settlements	Noted.  Housing policies will be reviewed and updated through the NDP process.	No change.

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/	Representation	PC Consideration	Changes to NDP
			for development that are not listed in paragraphs 4.14 and 4.15 of Policy RA2 of the Herefordshire Core Strategy.	Refer to Table 1 HC comments.	
1.5	<u>CLAUSE 5.1 SUSTAINABILITY</u>	Support / Comment	Whilst we support the objective of attracting new families and providing facilities and homes to retain young people in the parish as a key objective, we object to the limitation of development between settlements as will be further detailed below.	Noted.	No change.
1.6	<u>POLICY SUS 1</u>	Object	<p>We object to the broad nature of this policy which could potentially set up competing and confusing requirements with later housing and environmental policies.</p> <p>The policy requiring a financial contribution towards local services and essential services is not supported by evidence, and lacks prescription as to exactly what could be required of a proposed new development.</p> <p>The policy in relation to residential development creates an exception to the adjacency test contained in the Herefordshire Core Strategy RA2 and undermines RA3 by potentially sanctioning development in the countryside "where there is a justified need".</p>	<p>Noted.</p> <p>This Policy will be reviewed during the NDP review process.</p> <p>Refer to HC comments in Table 1.</p>	No change.
1.7	<u>POLICY ENV 2</u>	Object	Sub-Policy 3 is too prescriptive and should allow for new development proposals which mitigate their effects on the views and vistas identified provided they comply with Herefordshire Core Strategy strategic policies and Policy ENV 1.	Noted.	<p>Amend NDP.</p> <p>Review ENV2 wording in relation to protected views.</p>
1.8	<u>5.4 HOUSING</u>	Comment	The policy justification and general overview contains confusing references between Policies RAI and RA2. For example, Llangarron is described as being not an RAI village and yet it is scheduled as a paragraph 4.15 settlement under Policy RA2.	<p>Noted.</p> <p>This whole section will be reviewed and</p>	No further change.

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				updated through the NDP Review.  Refer to Table 1.	
1.9	<u>POLICY HOU 1</u>	Object	<p>We object to this policy as being contrary to the Herefordshire Core Strategy strategic policies contained within RA1 and RA2.</p> <p>Specifically, the Neighbourhood Plan seeks to promote unlisted settlements, for example Herberts Hill, Tredunnoch, Langstone, and Kilreague. Furthermore, new housing development in the two listed settlements under RA2 being Three Ashes and Llancloudy are restricted only to individual dwelling applications.</p> <p>This contradicts Policy RA2 of the Core Strategy which confirms that proportionate housing expansion is appropriate for both of these settlements to achieve the minimum growth targets specified in the Ross-on-Wye Rural Housing Market Area.</p> <p>This point is reinforced by the fact that in the general overview, it is pointed out that both Llancloudy and Three Ashes have been given little opportunity for expansion during the last fifteen years. As evidenced by this representation and our proposed site allocation, we object to the conclusion that Three Ashes "has very limited opportunities for residential development". Regarding housing numbers, the evidence to justify a windfall allowance of 27%-28% has not been produced. The majority of the housing growth should be positively</p>	<p>Noted.</p> <p>This whole section will be reviewed and updated through the NDP Review.</p> <p>Refer to Table 1.</p>	No further change.

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			planned for by means of allocation or increased settlement capacity highlighted within Policy RA2.		
1.10	<u>POLICY HOU 8</u>	Support	The Adjacency Test contained within the policies is welcomed.	Noted.  This section will be reviewed and updated - refer to Table 1. Settlement boundaries will be identified for the 3 main settlements and development outside these boundaries will be considered against countryside policies in the Core Strategy ie RA3-5.	No change.
1.11	<u>POLICY CSU 2</u>	Object	We object to this policy which seeks developer contributions to new but unknown community facilities and infrastructure.  There is no clear identification or mechanism to identify what could be required as a result of this policy. There is no reference to whether viability could be a consideration nor whether such contributions are necessary, reasonable and appropriate.	Noted.  This section will be reviewed and amended.	No further change.

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1.12	<u>CALL FOR SITES AND SITE SELECTION CRITERIA</u>	Comment	In reviewing the Minutes published together with the Consultation draft Neighbourhood Plan, it has been noted by us that a call for sites was undertaken, although both the method of assessment for sites put forward and the criteria upon which they were nominated for inclusion in the Neighbourhood Plan, is not clear and transparent. Notwithstanding the statement made in the Neighbourhood Plan that limited opportunities for residential development exist at Three Ashes, the Minutes indicate that one potentially suitable site was canvassed for discussion (Premier Garden Centre). It would appear that only the owners of proposal sites are to be given copies of the individual site assessments.	Noted.  The PC accepts that the previous call for sites and site allocation process was flawed. The NDP review process has included a new call for sites and technical assessment.	No change.
1.13	<u>LAND SOUTH OF B4521 THREE ASHES</u>	Comment	It is requested that consideration is given to the allocation of this site for residential development to address the above concerns. The proposed allocation is shown on the enclosed plan. We consider it as an appropriate site to deliver housing. The site is in/ adjacent to Three Ashes and is effective infill between Cambourne and Ashleigh. The site is suitable for the development of five dwellings and subject to suitable design, can uphold the wayside pattern of development. A new Highway access and visibility splays can be formed to Highway Officer requirements and drainage can be provided via packaged treatment and soakaways. Good quality design in local vernacular can be accomplished with sensitive design so as not to prejudice local amenity.	Noted.  The site assessment process will consider all submitted sites as part of the review.	No change.

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			In terms of Herefordshire Core Strategy Policy RA2, this site is better related to the main built form of Three Ashes than the Premier Garden Centre location.		
2.1	Site allocations	Comment	<p>I am writing about the above [<i>Neighbourhood Plan</i>] on the advice of Mr C Brace, Senior Planning Officer at Hereford County Planning Department, regarding the exclusion of our paddocks in the Neighbourhood Plan's proposed settlement boundaries.</p> <p>As you are aware, we responded to the request a couple of years ago from the PC, about possible sites in the parish which might be suitable for development. We applied in January for a Pre-Planning site visit, the results of which coincided with the receipt of the PC's Regulation 14 Public Consultation Notice. We can see, and it was pointed out to us by Mr Brace, that we are just outside the proposed settlement boundaries, which is very disappointing for us, especially given the reasons outlined by Mr Brace, the main ones which I list below:-</p> <ol style="list-style-type: none"> <li>1. The site is in open countryside and therefore not considered suitable for housing, (despite it being within 100 metres of the proposed 15 houses to be built nearby). We believe that we are the edge of the village and feel The Elms forms a natural village boundary. The land surrounding our paddocks comprise small blocks of amenity land as ours is, and is mostly used by local farmers periodically to graze sheep purely to keep the grass down. We have a horse in occasionally to do the same. Otherwise the land lies idle.</li> <li>2. The road is narrow and dark and therefore a danger for people having to get to the bus stop and village hall in the dark. We would comment that nearly all the residents in</li> </ol>	<p>Noted.</p> <p>The NDP Review will reconsider site allocations.</p> <p>All submitted sites to the updated call for sites process will be assessed and any preferred sites will be subject to further public consultation.</p> <p>The NDP Review will focus new development in the 3 settlements identified as suitable for housing growth in the Core Strategy.</p>	No change.

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			<p>Llangrove have to deal with this problem as 80 % of the roads and lanes in the village could be so described. People coming to live in the village are fully aware of the sporadic bus service and recognise that in a rural village the need for a car is paramount. I regularly walk to the village hall during the day and in the dark, and manage to survive with the aid of my ears, eyes and a torch.</p> <p>3. The main road through the village is already carrying too much traffic. Despite this, at least 25 houses are going to be built along this road, and as most houses have at least one car and more often as not, two, this could see a possible 40 – 50 cars emptying out onto the road. In view of point 2 above, these two negatives seem to contradict each other and the addition of one more house will have little impact.</p> <p>These are the points I wish to bring to your attention, as it would seem we are unlikely to obtain planning permission for one or possibly two houses on the paddock furthest away from The Elms. We are quite happy to apply for one house with a large garden which would be in keeping with the other houses in the lane.</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>Subject: RE: 170438 - Land at The Elms</p> <p>The only thing I can suggest, although it wont remove the concerns regarding highways and landscape character is to make representation on the Neighbourhood Plan which</p>		

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			is now on consultation. The NP directs development to land within the proposed settlement boundaries of Llangrove and Llangarron, outside of this would be treated as open countryside with a presumption against development, I would suggest once the Neighbourhood Plan is adopted you contact me and I can review if there are any changes that affect your land. If any changes to the NP support development of your land then clearly we would look at highways and other matters in more detail to assess if there's a way forward		
2.2	Site allocations	Object	I would like to log my objections to proposed development plans as follows: {1}My main concern is development without improvement to access roads i.e. road up from Whitchurch wholly inadequate for further traffic. {2}We currently have at least 8/9 new houses currently unsold in the village, do we need more?	Noted.  The whole section on housing and site allocations is subject to review.	No change.
3.1	Whole Plan	Comment	Our Client has recently been engaged in preliminary and informal discussions with Hereford County Council on the development of a signature tourism project at Llancloudy.  This process (and our involvement), has highlighted the progress of this Neighbourhood Plan to our client and they are keen to make a contribution to the debate and to become actively involved in helping to shape the success of the Parish, particularly in terms of rural regeneration and positively diversifying the economy. This project will provide a critical element in supporting Hereford's candidacy for UK City of Culture in 2021 and is part of an emerging Countywide dynamic.	Noted.  The NDP Review process offers an opportunity to include a positive planning framework to guide tourism proposals in the parish.	Amend NDP.  Review should include updated references to the proposed tourism related development and should ensure a positive planning framework to guide future development.

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			<p>We consider that it is critical that the Plan does not fail the test of soundness by virtue of this potential disconnect with the Core Strategy, particularly given the other positive provisions.</p> <p>We would also like to ensure that the Plan is not silent on our client's proposals which will be the subject of a planning application in 2018, given the significant economic and community benefits which it will deliver for the Parish and wider County. We do however welcome the wording of the generic tourism policies in the plan which would enable our client to bring their proposals forward as a suitably scaled project.</p> <p>The very nature of the project in establishing a new high-quality tourism destination in Llangarron Parish will have a transformational impact on the rural economy. The efficacy of the food offering on its own will have a significant impact on the local supply chain for locally sourced produce. It will also create the demand for highly skilled jobs in hospitality, catering, estate management and field sports and through its associated events programme will bring a major boost to the commercial vitality of the surrounding villages and towns. (We estimate the project will create in excess of 225 full time jobs both direct and indirect in the community).</p> <p>It is critically important that the Llangarron Neighbourhood Plan 2016-31 is properly equipped to help direct and manage the positive impacts that a strategic project of this nature can deliver to the local rural community, enabling the full suite of sustainability benefits to be realised.</p>		

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3.2	Section 4 - Vision & Objectives	Support	The vision statement and supporting bullet points are welcomed and fully supported.  The key objectives listed 1-8 are welcomed and fully supported.	Noted.	No change.
3.3	Section 5 - Planning Policies  5.1 Sustainability-	Comment	- The <b>Appendix I - Sustainability Statement</b> is welcomed and fully supported.  - The <b>Policy Justification Section 5.1</b> should make reference to the potential impact of a signature tourism project in the Parish. This should anticipate some change to the village forms particularly at Llancloudy and possibly at other village locations in order to accommodate supporting infrastructure improvements and connections, support services and developments to make these communities sustainable and resilient. It is recommended that this policy should be strengthened to require the development of a village design guide for Llancloudy as part of any signature tourism proposal.	Noted.  Consider as part of NDP Review.	Amend NDP.  Consider suggestions for new wording as part of NDP Review.
3.4	Policy SUS1	Support	Is welcomed within the context of the preceding comments	Noted.	No change.
3.5	Policy ENV1	Support	is welcomed	Noted.	No change.
3.6	Policy ENV2	Support	Is welcomed	Noted.	No change.
3.7	Policy ENV3	Support	is welcomed	Noted.	No change.
3.8	Policy EMP1 Rural Enterprises	Comment	The policy justification should refer to the potential for the Parish to host a strategic signature tourism project at Llancloudy given its potential significance for an employment boost within the local rural enterprise,	Noted.  The Employment section is being	Amend NDP.

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			<p>agriculture and food sectors. This project will become a major economic driver for the local economy and the policy justification should reflect this.</p> <p>Item 1 of this policy should be removed as the issues of amenity are covered in the reference to 'character' under item 2 of the policy.</p>	<p>reviewed but the policy wording could include references as suggested.</p>	<p>Consider additional wording as suggested as part of review.</p>
3.9	Policy EMP2 Diversification	Comment	<p>The policy justification under 'Agriculture' should refer to the potential for diversification projects to support signature tourism projects.</p>	<p>Noted.</p> <p>The Employment section is being reviewed but the policy wording could include references as suggested.</p>	<p>Amend NDP.</p> <p>Consider additional wording as suggested as part of review.</p>
3.10	Policy EMP3	Support	<p>Is welcomed</p>	<p>Noted.</p> <p>The Employment section is being reviewed but the policy wording could include references as suggested.</p>	<p>Amend NDP.</p> <p>Consider additional wording as suggested as part of review.</p>
3.11	Policy EMP4 Tourism	Comment	<p>The policy justification should refer specifically to the proposal to develop a signature tourism project in the Parish as described in the introduction to this submission. This project is strategic in nature and will develop an international signature destination project within the Parish, which will have major positive implications for the branding of the County of Herefordshire as a tourism</p>	<p>Noted.</p> <p>The Employment section is being reviewed but the policy wording could</p>	<p>Amend NDP.</p> <p>Consider additional wording as suggested as part of review.</p>

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			location and in terms of both job creation and diversification. It will bring new opportunities.	include references as suggested.	
3.12	Suggested New Policy	Comment	<p>It is suggested that a new policy is added to the plan - <b>EMP5 Signature Tourism Project</b> given the significance of our Client's proposal, which might be worded as set out below:</p> <p><b>EMP5 Signature Tourism Project</b></p> <p>Proposals for the development of a signature tourism project will be supported where:</p> <ol style="list-style-type: none"> <li>1. The proposals have no detrimental impact on the landscape character of the area.</li> <li>2. There is no detrimental impact on highway safety.</li> <li>3. Any supporting development is sensitively integrated within the village of Llancloudy in accordance with a village design statement agreed in advance with the County Council.</li> </ol>	<p>Noted.</p> <p>The Employment section is being reviewed but the policy wording could include references as suggested.</p>	<p>Amend NDP.</p> <p>Consider additional wording as suggested as part of review.</p>
3.13	Policy 5.4 Housing	Comment	<p>Given the then embryonic stage of these proposals the Neighbourhood Plan Process started considering its preferred housing options in advance of our client's discussions.</p> <p>It is therefore not surprising that Llancloudy has not been identified in the Plan to accommodate some the Core Strategy housing requirement. However, in light of the Sustainability Statement within the Plan placing an emphasis on the role of villages in supporting housing growth to underpin local economic development (which our client fully endorses) and the fact that the Hereford Core Strategy sets a requirement for more housing than</p>	<p>Noted.</p> <p>The housing section is being reviewed and updated. Proposed site allocations will be focussed on the 3 settlements identified in the Core Strategy and the net housing requirement for the parish over the plan period.</p>	No further change.

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			<p>is proposed in the Neighbourhood Plan, we consider that the Plan should refer to Llancloudy accommodating some further housing growth in tandem with the signature tourism project. This is particularly pertinent as this project will transform the sustainability credentials of this Settlement.</p> <p>Critically the above approach would help to ensure that, what is generally a very positive Neighbourhood Plan meets the Core Strategy Housing requirements, which it currently fails to do - both in terms of overall housing numbers and with what appears to be an implied 'maximum' reference in terms of housing. The latter is clearly at odds with the Core Strategy 'minimum' requirement and both of these issues could mean that the Neighbourhood Plan is found to be 'unsound'.</p> <p>Our Client's suggested amendments would represent a sustainable way of rectifying this weakness without watering down the Plans provisions, particularly in terms of making new housing sustainable. Further this would build on the Parish Council's important objective of supporting tourism and rural economic regeneration, both of which are critical to the area.</p> <p>A development project of the ambition set out for Llancloudy, delivering over 200 new jobs in the community (through direct and indirect employment) will require a modest housing supply to support its operation. The eventual masterplan will identify the requirement for on-site key worker accommodation (Policy HOU5) and for a modest supply of general needs housing within the village of Llancloudy. Available land within the village</p>	Refer to HC comment sin Table 1.	

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			could be developed sensitively and integrated into its place-making strategy for the project. This would be very much within the tradition of 'country estate' village development and inclusive of new community facilities as required (CSU1). Operationally it is preferable that this supporting housing requirement is outside or 'at the gate' of the signature project, hence the importance of a bespoke design guide to address character and integration issues as mentioned above.		
3.14	<b>Policies HOU1-10</b>	Comment	Would require some adjustment to support the delivery of the signature tourism project. Further discussion with the County Council and Parish Council is invited to agree an appropriate quantum of supporting housing development at Llancloudy.	Noted.	No change.
3.15	<b>Policies on Roads and Traffic, Community Facilities and Energy</b>	Support	Welcomed.	Noted.	No change.