
Burghill Parish

Neighbourhood Development Plan

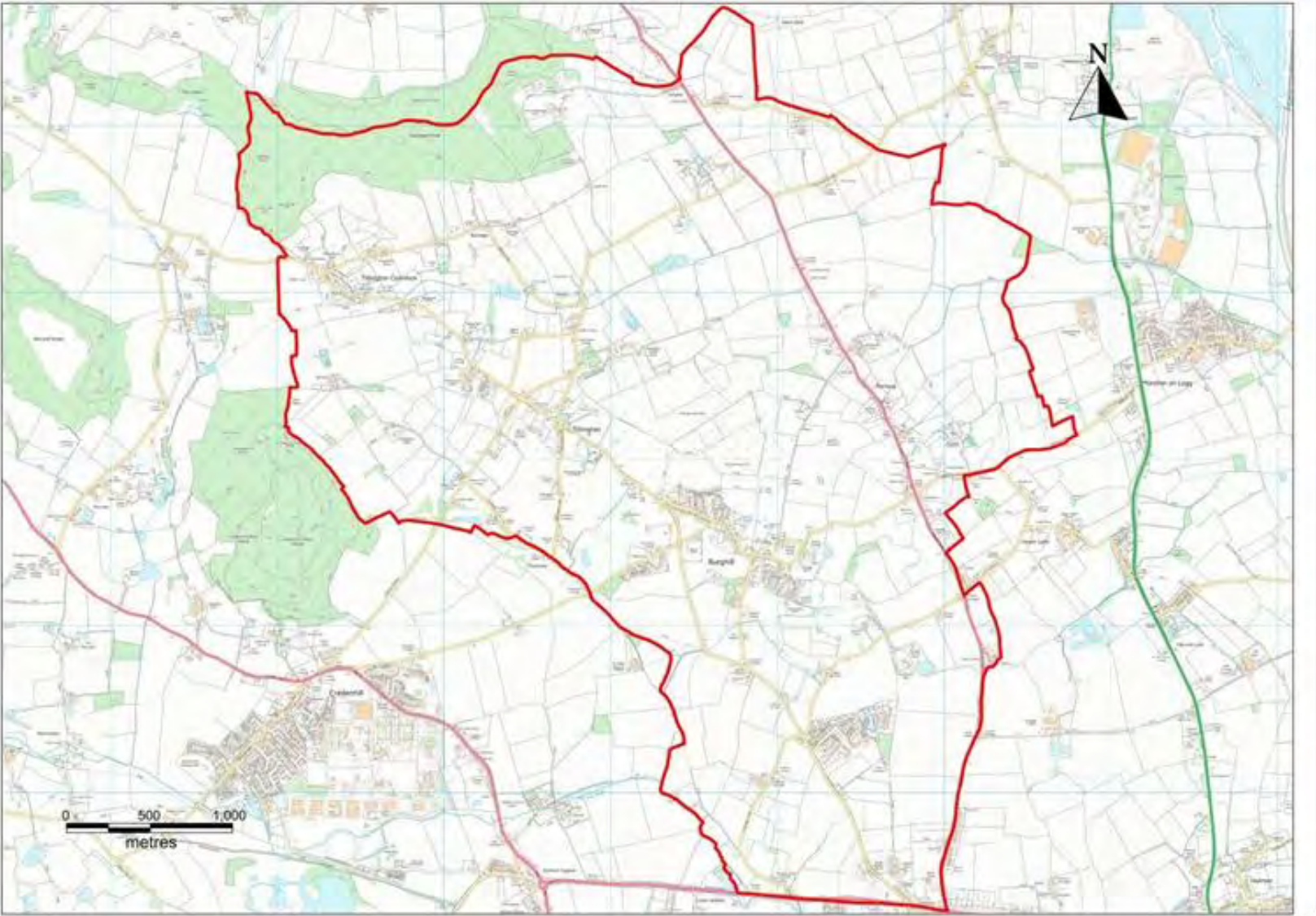
2011 - 2031



Consultation Statement

June 2016

Map 1 Burghill Neighbourhood Area



1.0 Introduction and Background

1.1 This Consultation Statement has been prepared in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Paragraph 15 (2)¹ **which defines a "consultation statement" as a document which –**

(a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;

(b) explains how they were consulted;

(c) summarises the main issues and concerns raised by the persons consulted; and

(d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

1.2 The Burghill Parish Council (BPC) had for some time been aware of the Localism Act of 2011 and the option of preparing and consulting upon a Neighbourhood Development Plan (NDP). In early 2013 a presentation had been given by the Herefordshire Council (HC) to the BPC explaining the available options for the making of a NDP, but no formal decision had been made by the BPC to embark on this specific task. This decision to make a neighbourhood development plan was not made until the BPC meeting on the 10 July 2013. At this meeting the BPC decided to form a steering group, made up of both BPC members and other interested parishioners, to commence the preparation of a NDP.

1.3 In July 2013, the Parish Council applied to Herefordshire Council for designation as a neighbourhood area. The area was formally designated by Herefordshire Council in September 2013 and is shown in Map 1 on Page 2.

1.4 Concerned that this steering group should be representative of all areas of the Parish, at the two initial meetings for the general public there was an open invitation for anyone who was interested to get involved and this

¹ <http://www.legislation.gov.uk/uksi/2012/637/contents/made>

wide representation was actively sought. There was a further invitation at the Options Days for any interested persons to get involved.

- 1.5 The consultation process has included public meetings, an extensive questionnaire, (which was delivered to every household) and Options Days with the opportunity to submit comments. Fliers were distributed to every household in the parish on 3 occasions and regular use was made of the community Parish Magazine, which again is delivered to every household, for frequent updates. Regular use was also made of the community website for these updates, as well as feedback from the consultation process.
- 1.6 Since the start of the process a NDP progress report has been presented at every parish council meeting. All these meetings are open to the public and at all meetings there is a 10-minute session for members of the public to present a matter of their choice to the PC for discussion.
- 1.7 This Consultation Statement lists the various stages in the consultation process and includes references to all the events and information that it comprised. It also contains feedback from the public in the form of analysis of the questionnaire, analysis of comments from the Options Days and the comments received at the Regulation 14 stage.

- 2.0 Draft Neighbourhood Development Plan and Informal Public Consultation
- 2.1 In September 2013, an article appeared in the Community Magazine explaining what a Neighbourhood Plan is. The Community Magazine is distributed, free of charge to every household in the parish. The article is included in Appendix 1.
- 2.2 In October 2013, a further insert was included in the Community Magazine **to draw residents' attention to a meeting to be held on 26th November 2013** to explain about the NDP. A copy of the insert is included at Appendix 2.
- 2.3 A public meeting was held 26th November 2013 at 7pm in the Simpson Hall in Burghill, to explain the nature of a Neighbourhood Plan, foster interest in the Plan and make a note of initial concerns. Notes of this meeting are included in Appendix 3.
- 2.4 In January 2014, a press release was issued, and an updating article appeared in the Community Magazine and on the parish website (www.burghill-web.co.uk). The press release is included at Appendix 4.
- 2.5 In February 2014 a further article was published in the Community magazine bringing residents attention to a further open meeting to be held on 4th March 2014. The article is included in Appendix 5. A flyer was distributed to all households in the parish at the end of February 2014, and posters were put on the Parish noticeboards advertising the meeting. The flyer/poster is included at Appendix 6.
- 2.6 The public meeting to raise awareness of the Neighbourhood Development Plan was held. It was attended by 115 residents and two further members were recruited to the Steering Group. Notes of the meeting are included at Appendix 7.
- 2.7 The Steering Group considered that a meeting was required with the Head of the local primary school - Burghill Academy. The meeting was held on 12th March 2014, the notes of this meeting are included at Appendix 8. In addition, a presentation was given by the Steering **Group to the school's** Governing Body about the Neighbourhood Plan on 31st March 2014. The response from Burghill Academy is included at Appendix 9.
- 2.8 In April 2014, an insert was included in the Community Magazine bringing the forthcoming questionnaire to the attention of residents. This is included at Appendix 10.
- 2.9 The questionnaires were distributed to every household in the Parish and to local businesses. A prize winning draw was used to encourage wider participation. In addition, to the main questionnaire, site development

questionnaires were attached to elicit potential development sites. A copy of the questionnaire is included at Appendix 11.

- 2.10 The questionnaire responses were analysed by Gloucester Rural Community Council (GRCC) who produced a report for the Parish Council. This is submitted alongside this Consultation Statement.
- 2.11 In June, July and October 2014, updates were included in the Community Magazine and on the Burghill Community website. These are included at Appendix 12, 13 and 14 respectively.
- 2.12 The Steering Group were planning on holding a series of Options Days to display update the community on progress since the questionnaire and allow residents to comment on the information provided. Flyers were delivered to every household, posters were erected on the parish noticeboards and the website was updated. The Flyer/poster is included at Appendix 15.
- 2.13 The Options Days were held Burghill Village Hall on 15th and 16th November 2014. There were several information boards around the room displaying the following information:
 - Vision and Objectives. (Appendix 16)
 - Development sites that came forward from the questionnaires (Appendix 18)
- 2.14 Those attending had the opportunity comment on the Vision and Objectives (Appendix 17) and also on settlement boundaries. (Appendix 19)
- 2.15 An information sheet (Appendix 20) was given to all attending explaining the next stages in the Neighbourhood Development Plan. This was also printed in the December/January edition of the parish magazine.
- 2.16 Copies of the questionnaire analysis by GRCC were available for consultation and parts of this were on display. (See Appendix 7 in Burghill Neighbourhood Development Plan for the rating of sites and analysis of Options Days returns).
- 2.17 The opportunity was also taken to ask whether any other parishioners would like to become involved in the process. (Appendix 21).
- 2.18 Appendix 22 includes photos of the Options Days event.
- 2.19 The responses from the Options Days event were analysed between January and March 2015. This information fed into the formulation of the draft plan and policies.

- 2.20 In May 2015, an update was included in the Community Magazine informing parishioners of changes following the Examination in Public of **the Herefordshire Core Strategy, and of the Parish Council's decision to** employ a firm of consultants to aid with the drafting of the Burghill Neighbourhood Development Plan. A copy of the update is included as Appendix 23.
- 2.21 A further update on the progress of the Burghill Neighbourhood Development Plan was included in the August 2015 edition of the Community Magazine. A copy of the update is included as Appendix 24.
- 2.22 At its meeting on the 18 November 2015 the Burghill Parish Council approved the second draft of the Burghill Neighbourhood Development Plan (BNDP). The Draft BNDP was sent to the Herefordshire Council (HC) for its first overview and Strategic Environmental Assessment. The PC arranged for the document to be available on both the Burghill and Tillington Community Website at:
- www.burghill-web.co.uk
- and also on the Burghill Parish Council web site at:
- www.burghillparishcouncil.org
- 2.23 Hard copies of the draft were available to view at the Simpson Hall during the CAP sessions on a Wednesday morning starting on December 2nd 2015. However, comments on the draft were not accepted until the official deposit period starts.
- 2.24 An update was included in the December edition of the Community Magazine to inform residents. This is included at Appendix 25.

3.0 Formal Consultation on the Burghill Draft Neighbourhood Development Plan – 20th January 2016 – 2nd March 2016

3.1 The public consultation on the Burghill Draft Neighbourhood Development Plan was carried out in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Pre-submission consultation and publicity, paragraph 14. This states that:

Before submitting a plan proposal to the local planning authority, a qualifying body must—

(a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area

(i) details of the proposals for a neighbourhood development plan;

(ii) details of where and when the proposals for a neighbourhood development plan may be inspected;

(iii) details of how to make representations; and

(iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;

(b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and

(c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.

3.2 The Burghill Draft Neighbourhood Development Plan was published for 6 weeks formal Public Consultation from 20th January 2016 to 2nd March 2016.

3.3 The Burghill Parish Council invited comments on the draft development plan. Comments forms are available at the Simpson Hall, Burghill during the CAP sessions on Wednesday mornings during the consultation period and on the Burghill Parish websites at:

www.burghillparishcouncil.org

with a link to the Parish website from the Burghill Community website at:

www.burghill-web.co.uk

3.4 An e-mail or letter was sent to all Consultation Bodies, including neighbouring Parish Councils, providing information about the consultation dates and the locations where the Draft Plan and accompanying documents could be viewed and downloaded.

- 3.6 The consultation process was also promoted in the following ways:
- Update in the Community Magazine
 - Update on the Parish website.
 - Flyer delivered to all households
- 3.8 A copy of the Draft Neighbourhood Plan was submitted to Herefordshire Council.
- 3.9 The list of consultation bodies, representation form, flyer, press release and screenshots of the websites are included at Appendix 26.

- 4.0 Consultation Responses to the Draft Neighbourhood Plan for the consultation 25th January 2016 – 8th March 2016
- 4.1 Table 1 below sets out the responses from consultation bodies submitted to the Draft Neighbourhood Plan, together with information about how these responses have been considered by the Parish Council and have informed the amendments to the Submission Neighbourhood Plan.
- 4.2 Table 2 below sets out the responses from residents submitted to the Draft Neighbourhood Plan, together with information about how these responses have been considered by the Parish Council and have informed the amendments to the Submission Neighbourhood Plan.
- 4.3 With regard to the responses from residents, over 200 responses were received. There were 153 responses from 3 dwellings and 8 persons).

Table 1 – Burghill Draft Neighbourhood Development Plan Formal consultation responses from consultation bodies

Ref. No.	Consultee Name	Page No.	Para. No.	Policy No.	Comments received	Suggested Amendments to NP
1	Welsh Water	55-56	6.7	B13	<p>'Given that the BNDP has been prepared in accordance with the Adopted Herefordshire Local Plan Core Strategy (CS), DCWW are supportive of the aims, objectives and policies set out.'</p> <p>Further clarity would be achieved by the addition of the following text:</p> <p><i>Development that may result in the capacity of the wastewater treatment works (WwTW) and/or the public sewerage network becoming overloaded will not be permitted. In either of these instances, development will need to be phased or delayed until capacity becomes available, either through DCWW regulatory investment or, in advance of this through the developer funding the</i></p>	Comments noted. Policy B13 amended to included suggested paragraph.

Ref. No.	Consultee Name	Page No.	Para. No.	Policy No.	Comments received	Suggested Amendments to NP
					<i>improvements themselves via the provisions of the Water Industry Act (1991) and/or section 106 of the Town and Country Planning Act (1990).</i>	
2	Natural England	15	2.32	n/a	We advise rewording the last part of paragraph 2.32 to "The plan area falls within the sub catchment of the River Wye (including Lugg) Special Area of Conservation (SAC)."	Comments noted. Amend paragraph 2.32 accordingly.
2	Natural England	General comment			<p><u>Green Infrastructure</u> Multi-functional green infrastructure is important to underpin the overall sustainability of a development by performing a range of functions including flood risk management, the provision of accessible green space, climate change adaptation and supporting biodiversity. An example of a green infrastructure provision is sustainable drainage systems. These can deliver benefits for people and for wildlife and make a valuable contribution to the local green infrastructure network. Actions such as re-naturalising watercourses can also bring multifunctional benefits, including benefiting flood attenuation.</p> <p>We note that several of the policies include green infrastructure which we welcome.</p> <p>We note that priority habitat for example traditional orchards and deciduous woodland are found within the plan area and there may be opportunities to protect and enhance the existing eco-system network. You may wish to consider identifying within the plan potential areas to be targeted for creation of wildlife corridors, to improve connectivity between habitats, and could link this with the relevant policy(s).</p>	<p>Comments noted. Policy B9, especially B(c) covers these recommendations.</p> <p>Comments noted. Sustainable drainage systems will become part of the GI network.</p> <p>Comments noted.</p> <p>The Parish Council do not wish to identify potential areas for the creation of wildlife corridors.</p>

Ref. No.	Consultee Name	Page No.	Para. No.	Policy No.	Comments received	Suggested Amendments to NP
3	Historic England	General comment			<p>Historic England are supportive of the Vision and Objectives set out in the Plan and the content of the document, particularly its emphasis on local distinctiveness including undesignated heritage assets and the maintenance of historic rural character.</p> <p>Overall the plan reads as a well-considered, concise and fit for purpose document which we consider takes a suitably proportionate approach to the historic environment of the Parish.</p> <p>Beyond those observations we have no further substantive comments to make on what Historic England considers is a good example of community led planning.</p>	Comments noted.
Herefordshire Council Service Providers Responses						
4a	Neighbourhood Planning			B1	<p>This Plan is well written with well researched / evidenced policies that have taken into account the requirements of the local community</p> <p>First paragraph are there any allocated sites outside of the settlement boundaries?</p> <p>Point a) in the interests of flexibility in accordance to the NPPF it may be worth changing 'not exceeding' to 'approximately' unless there is a characterisation assessment for the areas that identify the need for the maximum density.</p> <p>Point f) – wording is slightly ambiguous as to whether the 15% is of the 35% affordable or 15% overall?</p>	<p>Comments noted. This would not be in keeping with local wishes to keep to small housing developments.</p> <p>Comments noted. The Parish Council do not consider the wording to be ambiguous.</p>

Ref. No.	Consultee Name	Page No.	Para. No.	Policy No.	Comments received	Suggested Amendments to NP
				B4 B8 B11 B13	<p>Point d) and e) sound very similar and could be combined by adding after reconstruction in point e) 'or significant extension'</p> <p>point e) it states the 'character of the village' but the policy seems to detail about the Parish as a whole, needs clarifying whether it is for the village or the parish.</p> <p>it may be better to combine the two paragraphs, after 'uses. In the first paragraph continue from '...unless the following can be demonstrated...'</p> <p>Would be useful to number the paragraphs as there is so much information within the policy. First paragraph '...within Flood Zone 1 (low risk)' add 'where possible' after. Fourth paragraph add 'where possible' at the end Sixth paragraph, add 'where possible' at the end</p>	<p>Comments noted. The Parish Council consider that these are different issues.</p> <p>Comments noted. Change 'village' to 'parish'.</p> <p>Comments noted. Policy B11 amended accordingly.</p> <p>Comments noted and agreed. Policy B13 amended accordingly.</p>
4b	Development Management				No comments received.	No changes required.
4c	Planning Policy	49		B1-B12 and B12-B14 B9	<p>All these policies are considered to be in conformity with the Herefordshire Core Strategy.</p> <p>The plan does not seem to take into account the Hereford Relief Road corridor that runs through the southern extremity of the Parish.</p>	<p>Comments noted.</p> <p>Comments noted. The NDP does not propose any sites in the vicinity of the relief road.</p>

Ref. No.	Consultee Name	Page No.	Para. No.	Policy No.	Comments received	Suggested Amendments to NP
		53		B10	<p>"New development which impacts adversely on the openness of these sites..." This would appear to confine protection to one special quality. The policy could be strengthened by protecting against development that affects <i>any</i> of the special qualities that make the green spaces significant.</p>	Comments noted. Amend to 'openness of these sites, or any of the special qualities that make these spaces significant' .
		53		B11	<p>A lack of cohesion noted between the two opening paragraphs. The statement in the opening paragraph is not fully in conformity. It does not offer the flexibility for proposals to make alternative equivalent provisions elsewhere, or for them to replace facilities that are demonstrably unviable.</p> <p>However, the exception criteria (a and b) that follow do conform with Core Strategy policy SC1.</p> <p>It may give the policy a more localised flavour to perhaps list some existing community facilities to which this kind of protection should be given.</p>	Comments noted. Amended as above.
4c		56		B13	<p>Suggested minor change to wording for clarity:</p> <p>"All development should be preferentially located within Flood Zone 1 (Low Risk) <u>where possible and in accordance</u> with National Planning Policy Guidance (NPPG) and Herefordshire Council's Core Strategy (Policy SD3- Sustainable water management <u>and water resources</u>). It must also have regard to the <u>Strategic Flood Risk Assessment (2009) for Herefordshire...</u>"</p>	Comments noted. Policy B13 amended accordingly.

Ref. No.	Consultee Name	Page No.	Para. No.	Policy No.	Comments received	Suggested Amendments to NP
4d	Transportation and Highways	Objective 11			We would consider the bus provision to the parish adequate for the demand. We would however, support the exploration of alternatives to provide transport.	Comments noted. No changes required.
		48		B8(i)	Please reword the policy to replace the word "acceptable" and replace with "complies with this plan's Objectives 8, and Policies B7 and encourages use of active travel modes."	Comments noted. B8(i) amended accordingly.
		Appendix 3: Burghill Parish Design Guidance: Infrastructure			<ul style="list-style-type: none"> - Access roads within development sites shall be constructed to a minimum carriageway width of 6m plus combined cycleways and footways of 2.0m minimum width. – Please refer to the Highways Design Guidance (link: https://www.herefordshire.gov.uk/transport-and-highways/highways-and-new-development) We feel 6m on all developments would be unfeasible and we would ask that the design guidance matches our highway design guide.	Comments noted. Bullet amended to read 'Access roads within development sites shall be constructed in accordance with Design Guidance contained in the Herefordshire Core Strategy.'
4e	Landscape / Archaeology/ Conservation				No comment received.	No changes required.
4f	Strategic Housing				No comment received.	No changes required.
4g	Economic Development				No comment received.	No changes required.
4h	Environmental Health				<u>Dust, noise pollution</u> Our comments are with reference to the potential impact on the amenity – in terms of noise, dust,	

Ref. No.	Consultee Name	Page No.	Para. No.	Policy No.	Comments received	Suggested Amendments to NP
		37		B1(d)	<p>odours or general nuisance to residential occupants that might arise as a result of any new residential development or any new commercial or industrial development.</p> <p>Our recommendation is that this item be amended slightly to say (not located adjacent to noise <i>or nuisance</i> generating agricultural, industrial or commercial activities)</p> <p>In principle we have no objections to the proposed sites at Map 2 Lower Burlton, sites 2B and 2D, Map 3 site 21.</p> <p>We have some reservations about the proposal in Map 4 for sites 10,22 and 25 due to the close proximity of Tillington Business Park, as the activities at the Business Park could impact on residential occupants on the proposed site (noise, nuisance, dust), depending on the planning restrictions and designated use of the Business Park site.</p> <p><u>Contaminated land</u> Sites 2B, 2D, 10, 22, 25 and White Roses: These sites have been historically 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.</p>	<p>Comments noted. Policy B1(d) amended accordingly.</p> <p>Comments noted. Current activities at the site would not lead to an expectation of these kinds of problems. We would expect any potential problems to be addressed at the planning stage.</p> <p>Comments noted. This advice should also be taken by HCC when Planning Applications for conversion of existing, redundant buildings to dwellings are considered. No changes required.</p>

Ref. No.	Consultee Name	Page No.	Para. No.	Policy No.	Comments received	Suggested Amendments to NP
					<p>Site '2B and 'White Roses'</p> <p>The two sites are located in an area, which has historically been used for the quarrying of sand and clay operation and since 1986 has been classed as unknown filled ground (pit, quarry etc.)</p> <p>Sites identified as unknown filled ground can be associated with contaminative fill material. In practice, many sites identified through the historical mapping process as unknown filled ground are instances where hollows have been made level with natural material, have remained as unfilled 'hollows' or have filled through natural processes. However, there are some instances where the nature of the fill is not inert and would require further investigation. Without any additional information it is not possible to comment further on this site. Any additional information you may be able to obtain will help in determining the exact nature of the site.</p> <p>Responsibility for securing safe development rests with the developer and/or landowner. It is incumbent on the developer and/or landowner to demonstrate that the proposed development is both safe and suitable for its intended use.</p> <p>The sites historic potentially contaminative use (former quarry) will require consideration prior to any development. I would recommend any application that is submitted should include, as a minimum, a</p>	<p>Comments noted and a summary of points raised included from paragraph 6.1.26 onward in the NDP.</p>

Ref. No.	Consultee Name	Page No.	Para. No.	Policy No.	Comments received	Suggested Amendments to NP
					<p>'desk top study' considering risk from contamination in accordance with BS10175:2011 so that the proposal can be fully considered. With adequate information it is likely a condition would be recommended.</p> <p>32 Site: Solar Farm Site Our records suggest that the proposed development located on a known closed landfill site (Winstow Pit, Burghill). Because of this it will be necessary for the applicant to undertake a site investigation to consider the risk from the landfill to the development. Therefore we would recommend a condition be appended to any planning approval to ensure the site is both safe and suitable for its intended use.</p>	Comments noted. Additional paragraph included as 6.8.4.
4i	Parks and Countryside				No comment received	No changes required.
4j	Waste				No comment received.	No changes required.
5	Herefordshire Council				<p>In response to the Burghill Parish Neighbourhood Development Plan 2011-31 Consultation Draft, Herefordshire Council owns the land shown hatched red on the attached plan and puts forward this land to be allocated within the Plan as land suitable for housing development during the plan period. The land is considered suitable for the following reasons:</p> <ul style="list-style-type: none"> • Its proximity and accessibility to the existing highway network • Its proximity to the existing urban area of Hereford 	This site (2a) was included in the site assessments carried out. The site did not score as favourably as others and as such was not brought forward as a site allocation.

Ref. No.	Consultee Name	Page No.	Para. No.	Policy No.	Comments received	Suggested Amendments to NP
					<p>City and all the public services that provides.</p> <ul style="list-style-type: none"> • The massing of the development in this location will enable on and off site infrastructure to be delivered in a cost efficient manner and therefore improve the viability and deliverability of the development of this land for housing • The land is owned by Herefordshire Council who can secure vacant possession and ensure the land is made available for development at the earliest opportunity, thus ensuring the requirements of the Plan are achieved within the Plan period, subject to all necessary consents and market demand. <p>I would be grateful if you could acknowledge receipt of this email and if you require any further information then please contact me.</p>	
6	Holmer & Shelwick PC				Holmer and Shelwick Parish Council have discussed the Neighbourhood Plan put forward by Burghill and Would like to fully endorse the plan.	Comments noted.

Table 2 Burghill Draft Neighbourhood Development Plan Formal consultation responses from consultation bodies

The Burghill Parish Council thanks all those people who made comments on the Draft NDP and those who gave up their time to participate in the process and engage in discussion. Following the current stage, the Draft NDP will be amended, where appropriate, and sent to the Herefordshire Council to continue through the next stages in the process.

Note 1: Entries in this table and register of submitted comments: The entries in this table are taken from the comments sheets deposited at The Burghill Valley Golf Club; The Tillington Village Shop; the box made available at the (Community Action Point) CAP sessions at the Simpson Hall, Burghill on Wednesday mornings; postings to the PO Box number 350; or taken from on-line submissions arising from the postings regarding the Draft NDP on the PC's website. Some of the comments appear in full and others in abbreviated form. A complete hard copy of all comments is held by The Clerk to the Parish Council. Text in submissions that is deemed to be not relevant to the process, defamatory, offensive or unsuitable for publication has been deleted and substituted with: (Text removed *****). To protect the privacy of individuals, where names appear in the text in submitted copies of Emails these names have been deleted. The entries in the table below from Burghill Parish Council attempt to provide an answer to the comments received during the consultation period. Many of the comments refer to similar issues on location, site selection, sustainability, drainage deficiencies and infrastructure provision. It is recommended that readers refer to the entire contents of the table to gain an appreciation of the scope of both comments and replies that are made as comments should not be viewed in isolation.

Note 2: The site selection process: Many of the comments in the table below refer to the site selection process and the choice of sites with the potential for development. The NDP process can only appraise sites for potential development which have been submitted by landowners. All the landowners concerned were aware that their sites would be assessed and these sites were displayed at the Options Days held in the autumn of 2014. The PC did not receive requests from any landowners to withdraw sites from the NDP process. These submitted sites were assessed in line with guidance given by the Herefordshire Council to all parish councils making NDPs. The sites with the highest scores in the Burghill Parish are listed in the Draft NDP as assessed and prepared by professional independent town planning consultants, with experience in this type of work in NDPs.

Note 3: Access to potential development sites: Throughout the site selection process no submissions were made by landowners requesting that the access to sites should come from any specific direction.

Note 4: Options Days votes: All the votes made by visitors at the Options Days are included in a table in Appendix 7 to the Draft NDP.

Note 5: The Granting of Planning Permission: The NDP in its final form is not a document which grants planning permission. Despite the inclusion of a site in the Draft NDP, the release of a site for development is at the discretion of the landowner. Any planning permission would have to be granted by way of an application for planning permission to the appropriate Local Planning Authority, which in the case of Burghill Parish is the Herefordshire Council.

Note 6: Publication process: Throughout the 30 month NDP process PC and SG members have made themselves available to answer questions from those with an interest in the progress of the NDP. At all significant stages of the NDP process fliers have been distributed throughout the parish, together with postings on parish notice boards and information in the community magazine. During the Regulation 14 six-week publication process members were available at the Simpson Hall, Burghill for one morning each week to discuss the draft NDP. At these sessions large table top maps were displayed of the parish showing potential development sites, also hard copies of the draft NDP were available for viewing. Hard copies of the draft NDP were also made available for six days each week at the Burghill Valley Golf Club. Copies of the following documents were available on the PC's website: Draft NDP, Strategic Environmental Report (SEA), Habitats Regulations Assessment (HRA), Consultants' Site Assessment report. HC has confirmed that the PC has fulfilled its obligations on the consultation process as set out in Regulation 14 of the relevant Statutory Instrument.

Note 7: Infrastructure provision: Many of the representations refer to perceived local deficiencies in infrastructure and mainly these are linked to highway safety and drainage. Any new access to a development site has to comply with modern highway safety standards concerning its width and visibility splays appropriate to the speed of traffic on the public highway. If these features cannot be achieved, the development would not be permitted. Local drainage problems have also been identified and many of these refer to septic tanks and their ground filtration systems (soakaways) which do not perform as they should. It is likely that new development would have to provide sewerage systems that would connect to main public sewerage systems. In some cases, it is normal for developers to requisition new public sewers from the relevant water company using powers available under the Water Industry Act. The sewers that are provided through this cost sharing mechanism would become public sewers and providing gradient and topography are acceptable existing properties, at their own cost, would be able to connect to these new public sewers. The PC considers these factors as a potential advantage in improving parish infrastructure. Both these infrastructure matters are covered by HC Core Strategy Policies SD3, SD4 & MT1; and NDP Policies B7, B12 & B13.

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
1	63	Map 3	Map 3	Comment	Settlement boundary near "The Chase" needs adjustment to include residential driveway.	Comments noted. Agreed.	Amend settlement boundary on proposals maps to include the residential driveway of "The Chase" .
2	Whole Doc	Whole Doc	All	Comment	A wide ranging submission relating to socio-economic matters which are not specific to an NDP. Nevertheless, it is an interesting perspective on village life, people movement, lifestyle changes, rural environment issues, isolation, community values and the general enhancement and well-being of parishioners both now and in the future.	Comments noted.	No change
3	41	6.3	B6	Support		Comments noted and support welcomed.	No change
4	42	6.4	B6	Support		Comments noted and support welcomed.	No change
5				5	Deleted as duplicated with No 19		No change
6.1	44 & 55		B7 & B12	Comment	Policy No B7 and B12 refer to: Traffic Calming Measures" and speed bumps should not be employed.	The descriptions for traffic calming are purposely generic to allow for the detail to be worked up at a later date, allowing all appropriate measures to be considered.	No change
6.2	62		Map 2	Comment	Should the site to the west of the Tillington Road have been included in the NDP as it is now the subject of a planning application	The site was considered as in the "Site Assessments" process (Site 2E) . The site was a less favourable site as was not brought forward as an allocation in the NDP.	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
7	All	All	All	Support		Comments noted and support welcomed.	
8	All	All	All	Support		Comments noted and support welcomed.	No change
9	All	All	All	Support	Appreciate all the work that has gone into this very thorough plan and we support the proposals	Comments noted and support welcomed.	No change
10.1	64	Site Nos 10 22 & 29	Map 4	Support	Support the potential development areas around Tillington which are within easy walking distance of facilities. It would be hoped that a pavement would be placed down to The Bell	Comments noted and support welcomed. Hopefully, development proposals in Tillington will facilitate a future footway extension.	No change
10.2	63	Site No 21	Map 3	Object	Site 21 combined with the recently permitted site at Pye Finch is likely to cause traffic problems at the cross roads.	The development of Site 21 should enable highway improvements as part of any future proposals, improving the visibility splays at the junction to achieve relevant highway standards. See Note 3 above.	No change
11	36	6.1.3 0 Site No 21	Map 3	Object & Comment	The Development of site No 21 will result in increased traffic along the through route and at the poor quality highway junction which will increase congestion. Dangerous crossroads with poor visibility. The path to the school is inadequate and the shop and pub are quite a distance away from site No 21.	The development of Site 21 should enable highway improvements as part of any future proposals, improving the visibility splays at the junction to achieve relevant highway standards. The Parish Council recognise that many of the footways in the Parish are of poor quality and narrow and have included policies within the NDP to address infrastructure improvement. (Policy B12).	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
12.1	64	Site No 10	Map 4	Support	Support the potential development areas around Tillington business park which in view of the proximity to services is a sustainable location.	Comments noted and support welcomed.	No change
12.2	63	Site No 21	Map 3	Object	I don't think the position of this site is suitable for development. Access would have to be on the main Tillington Road which is already dangerous with limited visibility and fast moving traffic. Also the look of the village would change, with Pye Finch development on one side of the road and this on the opposite side, it would create urban sprawl. Also we would have increased traffic on the Tillington Road from the Pyefinch development.	The development of Site 21 should enable highway improvements as part of any future proposals, improving the visibility splays at the junction to achieve relevant highway standards. The Herefordshire Council Core Strategy identifies Burghill as a growth settlement. Both Site 21 and Pyefinch were assessed as part of the process and scored highly.	No change
13.1	63		Map 3	Support and Comment	Record appreciation of NDP group and basically finds plan acceptable. Map 3 shows the proposed boundary in red with Grange Farm outside the boundary, whereas the map that shows the late submissions includes the farm within the boundary. Why has this changed?	The Map in Appendix 2 (Late submissions) refers to the Burghill Conservation Area boundary and not the settlement boundary.	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
13.2	69		Map	Objection	I do not like the extensive additional development on the late "submission map" as they extend outside the settlement boundary into open countryside. Sites 34/35 are on low ground and prone to flooding and a high water table and there is no easy access for connecting a road to the site.	The majority of the late submission sites were rejected for future development through the Site Assessment process. However, part of Site 34 was considered suitable for a graveyard extension and has been allocated as a Local Green Space.	No change
14.1		47	6	Map 2 Policy B8	Surely the developments suggested at 2B Lower Burlton and White Roses are backland development, which, as is stated in Policy B8 has a detrimental impact on the character of the village. The existing residents fronting Roman Road would effectively become surrounded by housing No change on all aspects. This does not give the feel of a village, more of a city suburb. Any development at these sites would no doubt just extend the city boundary and in time residents would in all likelihood be adopted by the city and lose their parish identity. Access at the above two sites needs serious consideration, the current access at site 2B is only a right of way and is insufficient to serve any such development. Presumably if access was on to the Tillington Road via the previously suggested site 2C, would eventually result in site 2C being developed at a later date. Again	The site was assessed during the "Site "Assessments" exercise. However, Sites 2B, 2D and White Roses emerged as preferred sites in this locality with highway frontage. It is accepted that the three sites at Lower Burlton will result in an increase in local traffic. However, all three front the public highway. Any future access to the sites will have to comply with modern highway safety standards and visibility splays. This will be assessed as part of any future planning application. (See Note 5 above)	No change No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
					<p>this would surely only result in the City boundary being extended. The volume of additional vehicles from the sites at Lower Burlton would no doubt be in the region of over 40 when you consider most houses now own at least 2 vehicles spread between parents and any children. These vehicles would all be contributing to the ever increasing traffic flow on Roman Road and the surrounding area, and as the overall development of the area is quite significant much of this traffic would be likely to be contributing to the ever growing traffic back log at peak times.</p> <p>Sustainable drainage systems have been noted in policy B8, a great deal of research needs to be put into this. The site at 2B has flooded in the past causing damage to pipework and drains of local residents, it currently contains the septic tank and drainage for 4 existing properties and some of White Roses. Could this land realistically take the sewage and drainage of the existing properties and also those suggested by the development, there is no mains sewage to connect to along Roman Road. Site 2B is effectively a collecting point for run-off water from both the Canon Pyon Road and White</p>	<p>The existing drainage issues are noted, although modern infrastructure accompanying new development can solve existing problems. Policy SD3 of the HC Core Strategy addresses these matters.</p> <p>See note 7.</p>	<p>No change</p>

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
					Roses due to it being surrounded by such high banking. As any development could affect my property so detrimentally in this respect, drainage is a major concern of mine. Residents were informed during the floods two years ago that it would take around 10 years for the bedrock to fully recover and we are currently emptying septic tanks more frequently than in the past.		
14.2	49	6	Map 2	Objection	The development proposed at 2B will not in my opinion maintain the distinct and separate identity of the Parish, any such development would be seen as an extension to the city boundary. The huge development proposed at Huntington /Three elms needs to be taken into consideration. Whilst this is a city proposal it will extend to the southern edge of Roman Road, any development by Burghill Parish to the north of the road will really only link up with this, again extending the city boundary. The wealth of wildlife seen and enjoyed daily at site 2B would be lost, birds of prey, woodpeckers are regulars at the site. Given the local proposals for Huntington /Three Elms the overall effect on local wildlife would sadly be quite destructive	The Site Assessment process assessed a number of sites throughout the Parish and scored them according to a number of criteria. This site (2B) was one of the preferred sites both in terms of scores and option days' scores. The effect of proposed development on wildlife will be assessed at Planning Application stage through supporting documentation submitted.	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
14.3	56	6	13	Objection	As noted in my objection relating to policy B9, the site at B2 seriously flooded 2 years ago causing damage to existing drainage systems. The site at 2B is subject to a great deal of surface water drainage from surrounding roads and properties, development at site 2B and White Roses can only exacerbate an already existing problem. I certainly would not wish to buy a property erected on the land based on what I have seen over the past 20 years at the site. Any drainage works I am sure would not eliminate all the problems and we are being told by environmentalists to expect wet winters to become the norm in future years. I would be very concerned that any development could in fact impact on local existing residents by effectively pushing the problems outwards and on to our properties.	The existing drainage issues are noted, although modern infrastructure accompanying new development can solve existing problems. Policy SD3 of the HC Core Strategy addresses these matters. See note 7 above.	No change
15.1	10	2.1.2/ 13		Comment	2.12 - The plan states that there is a "fairly compact housing group near the highway cross at Whitmore" . 2.13 – The plan states, "the dwellings of Tillington Common form no consolidated group" . Close examination of the map indicates that there is actually a	It is correct that there is a building group within the Tillington Common area. Amend paragraph 2.13.	Amend paragraph 2.13 1 st sentence to read as follows: "The dwellings of Tillington Common form a small group" .

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
					larger compact housing group around the main road / Badnage lane junction than at Whitmore Cross in Tillington		
15.2	35	6.1.2 6		Object	<p>6.1.26 The sites that are shown within the possible settlement boundaries at Burghill, Tillington and Lower Burlton have the potential to meet the housing requirement imposed on the Parish by the Core Strategy and demonstrate alignment with its policies. Furthermore, they have the potential to achieve this growth at a modest housing density, in line with the aspirations of parishioners and which would also reflect the character and appearance of the parish".</p> <p>The number of dwellings inside the proposed settlement boundary for Tillington is currently 18, including the Pub.</p> <p>The addition of a further 24 is hardly "growth at a modest housing density" as it is an increase of over 130%, and nowhere near the desired 18%.</p> <p>I am not against development within Tillington, but this is grossly disproportionate.</p> <p>After speaking to the Chairman of the Steering Group, I understand his vision of two main housing areas of Burghill and Tillington, with the</p>	<p>The Herefordshire Core Strategy identifies both Burghill and Tillington as sustainable settlements which will be the main focus of proportionate housing development.</p> <p>Proposed housing sites put forward were assessed through the Site Assessment process. The most favourable were brought forward into the NDP as housing allocations.</p> <p>The density is appropriate for the area. The 18% proposed is based on the number of dwellings in the Parish, with the villages of Tillington and Burghill being the main focus for housing growth.</p> <p>With regard to the inadequacy of</p>	<p>No change</p> <p>No change</p>

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
					<p>school and the few amenities in the area accessible by pedestrians from both communities. However, Tillington will be transformed from a small community to something else. Tillington in common with Tillington Common does not have the necessary mains services to support such a development, and probably has one of the most dangerous junctions in the parish at Whitmore Cross.</p> <p>The Owner of Tillington Business Park has already been refused permission for an entrance to his site from the main road due to the dangerous road conditions. In order for this development to go ahead, major road alterations will be needed along with the provision of main services. If these are provided, they will attract major developers with only an eye for profit, which will endeavour to breach the settlement boundary line, and no doubt in time would be successful.</p>	<p>services/infrastructure in Tillington, the Parish Council shares these views. However, it is anticipated that developer contributions will address some of these issues.</p> <p>See Notes 5 & 7 above.</p>	No change
16	1	1	1	Comment	<p>Given the constraints imposed upon the village by government, I believe that the Neighbourhood Plan is by far the best way to minimise the effects which will come from the need to build about 60 new houses. It has taken into account the wishes</p>	<p>Comments noted and support welcomed.</p>	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
					of all villagers who wanted to comment, and has gathered a huge amount of data about the village and the aspirations of villagers. After months of analysis, this data has been used to identify those areas of the village which most villagers would be prepared to see developed. Many other sites have had to be discarded due to government regulations regarding, e.g. sustainability. Very few villagers will be happy with having land near them developed, but houses have to be built somewhere. It would be very unfair for the village as a whole if undue weight was given to a vocal minority who oppose one part of the plan. I have had to accept that the piece of land behind us will be developed and spoil our views, other villagers should also accept that development must take place in areas chosen by facts not emotions.		
17.1	56	6	13	objection	I am concerned that having three developments at sites 10, 22 and 25 will have a detrimental to the amount of surface water in the area. This area is NOT LINKED TO MAINS DRAINAGE therefore all the water run-off from the proposed homes (both surface water and discharge from bathrooms, en-suites, toilets, washing machines, dishwashers	The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development. It was also the view expressed in questionnaire returns that the NDP should designate sites for development in addition to identifying	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
					etc.) will drain into the water table. The area around this side of Crowmoor Lane where it adjoins the golf course is already prone to flooding. This area is below the level of the proposed development (Particularly Area 25 at Cherry Orchard) There is an open drainage ditch which runs at the bottom of the orchard at the back of Victoria Park which serves to drain the orchard and surrounding farm land. This runs less than 2 metres from the back of my home. At present it is dry in the summer but I am concerned that the provision of these new homes above the level of Victoria Park and other properties on Crowmore Lane will cause the running of "foul water" along this ditch all year round with the resultant increase in pollution causing an increase in insect infestation and smell.	settlement boundaries. With regard to infrastructure, new development will be expected to incorporate drainage arrangements as part of the Planning Process. See notes 5 and 7 above.	
17.2	44	6	Map 2	Objection	I am concerned that there is no firm plan to provide a footpath adjacent to the road from the Bell P.H. to Whitmore Cross Roads. Without this provision, children will not be able to walk to the school safely. I am further concerned that this small area will see a significant increase in the number of vehicles accessing the road to Hereford at	Highway improvements will be facilitated through future development. The potential sites identified (Nos 10 & 22) could offer the ability to improve the alignment of the highway and also provide footways in the area. In addition, Policy B7 promotes the introduction of appropriate	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
					peak times as there will be three additional access points onto the road in a few hundred yards. Given the speed of the traffic traversing this road toward Hereford I feel that without significant speed reduction measures, road widening and improvements to road layout to increase the width of the road and to improve visibility this is likely to become an "Accident Blackspot".	traffic calming measures.	
18	36	6.1	Policy B1	Comment	Whichever way the village is developed; the road network has to be a major consideration. The only main road into Burghill is the Tillington Road (From the Roman Road into Tillington) Rather than spread housing development in and around the village, it would be beneficial to site small developments near existing amenities i.e. school, pub, shop and garage thereby creating cohesions and a "centre" within an integrated community.	A factor in the Site Assessment process was the sustainable location of the sites close to services. Both Burghill and Tillington are identified through the Herefordshire Core Strategy as sustainable locations. With regard to infrastructure.	No change
19	36	6.1	B1	Objection	When we purchased our house in 2010 we were assured that there would be no development of the paddocks at the rear of our property, currently shown on the map on Page 62 as 2B and White Roses. The view from our property was one of the reasons we purchased it and we love the rural feel that the property has at the rear	Several sites were submitted and assessed through the Call for sites and Site Assessment process, these included 2B and White Roses. Sites 2B, 2D and White Roses scored highly and were taken forward into the plan as proposed allocated sites. Whilst the	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
					<p>as opposed to the very busy Roman Road at the front. I strongly object to any development to this site. I feel that given the new proposed development of 1000 homes on the opposite side of Roman Road, plus the new planning document requesting permission to build a further 50 homes on the corner of Tillington Road/Roman Road there is no necessity to build on this plot of land.</p> <p>The ecological impact of developing this plot of land would be great as it is abundant in wildlife, including bats. My cellar floods due to the sloping nature of the ground behind us and I am seriously concerned about the affect developing the land would have upon the structure of my house.</p>	<p>infrastructure issues are noted, with regard to infrastructure, new development will be expected to incorporate drainage arrangements as part of the Planning Process. See notes 5 and 7 above.</p> <p>Whilst a planning application has been submitted, the Parish Council consider it expedient to submit the Burghill NDP with its current allocation of sites as soon as possible. Once submitted, the NDP becomes a material consideration in the determination of planning applications, enabling the Parish to have some control over future development.</p> <p>The effect of proposed development on wildlife will be assessed at Planning Application stage through supporting documentation submitted.</p> <p>Although the sites at Lower Burlton are divorced from services within the Parish, they are close to services in the city.</p> <p>The application for the dwelling on Tillington Road is noted.</p>	

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
					One of the remits of the Burghill Parish Plan is to build housing so that "first time buyers and the elderly can remain part of the community" which I would argue rules out this site. It also states that the plan is to lessen car usage. We are so far away from the Parish Hub and with poor bus services that it would be extremely difficult for anyone without a car to be a true member of the community. Would Burghill primary school be the designated school for children living in these properties? I cannot envisage children walking there. If Trinity is the nearest primary school is it acceptable to plan housing that relies upon resources from another Parish?		
20	47	6	8	Objection	I am surprised that anyone would consider building in a field that is prone to flooding (2B Lower Burlton). Also it has a septic tank serving four houses on Roman Road. I have lived in a house that has flooded. I know how awful it is to get over it. Also it is hard to get insurance after a flood. Please think carefully before approving this development.	A strategy to alleviate the flooding issues will have to be submitted with any planning application for the site. This could result in environmental benefits to the existing residents.	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
21	35	6.1 etc.	24	Support & Comment	People have obviously devoted a lot of time to this, taken note of what most villagers appear to want i.e. infill rather than spread where possible. What more can you do? Thank you.	Comments noted and support welcomed	No change
22	36	6.1.3 0	B1	Object & Comment	Site No 22 – will not be suitable if access is from the main road – a very unsafe and dangerous stretch of road near a bend. Site Nos 25 & 10; 10 houses suggested for each site when clearly the majority of parishioners wished for no more than 4 to 7 dwellings per site. (Par 3.1.2) A total of 24 dwellings in Tillington is totally out of proportion with the 18% expansion overall. If 60 dwellings need to be placed there are other sites available. A total of 24 dwellings concentrated in this small area is far too many and too close together. Has anyone considered how the local school might be affected?	The Herefordshire Core Strategy identifies both Burghill and Tillington as sustainable settlements which will be the main focus of proportionate housing development. Proposed housing sites put forward were assessed through the Site Assessment process. The most favourable were brought forward into the NDP as housing allocations. Access and other issues will be assessed as part of any future planning application.	No change
23.1	64			Object	I was shocked, disappointed and angry to see the proposed developments for Tillington in the Neighbourhood Plan. All those directly affected, i.e. those living closest to the proposed development sites, should be consulted directly. There has been absolutely no contact, consultation	The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development. Proposed housing sites put forward were assessed through	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
					<p>has been non-existent and totally inadequate The proposed sites are in green field areas. The site behind Tillington Business Park is green field and should never be included. It is only the units' area on the park which is brownfield. The size of the development is totally disproportionate. Also the site on the Bell Inn field is green field and the owner was never consulted about anything to do with the proposed access. It seems as (Deleted *****)</p>	<p>the Site Assessment process. The most favourable were brought forward into the NDP as housing allocations.</p> <p>The current NDP is a draft document on which comments are invited from the community.</p> <p>All potential development sites were displayed at the Options days in Autumn 2014. Visitors were invited to comment. The comments were taken into account by the Parish Council when assessing the sites and allocating for development.</p> <p>Site 10 does not include the Business Park, which will be retained in commercial use. Part of the land to the rear of the Business Park within Site 10 has been previously used as part of the Business Park and is considered as Previously Developed Land.</p> <p>The land adjacent to The Bell was put forward for development by the land owner.</p>	

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
23.2	64			Object	<p>The size of development is totally disproportionate. The plan aims to have about an 18% build of existing numbers of homes per area. Tillington is a small group of houses and the percentage of new developments proposed amounts to well over 120% of existing homes which is ludicrous. The whole basis of the Neighbourhood Plan was that it would be proportionate and Burghill should take the vast majority. These proposals are incredibly disproportionate.</p> <p>The proposed access on both sides of the road is extremely dangerous. I walk along regularly and it is a nightmare with the vast majority of drivers ignoring the 30mph speed limit. Any new access, with subsequent increased volume of traffic, would only make the area even more dangerous. There have already been some terrible accidents. We do not want any more.</p>	<p>The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development.</p> <p>Proposed housing sites put forward were assessed through the Site Assessment process. The most favourable were brought forward into the NDP as housing allocations.</p> <p>The development of the sites should enable highway improvements as part of any future proposals, improving the visibility splays at the junctions to achieve relevant highway standards. See Note 3 above also.</p>	No change
23.3	64			Object	<p>It is totally wrong to include neutral comments for a site along with those in favour. This makes a mockery of democracy and it is just plain bad mathematics. Neutral is neutral, not for a proposed site! I would like to know who was responsible for such an appalling error.</p>	<p>The submission NDP will include an Appendix which identifies all the scores for the sites. In addition, the Site Assessment report produced by independent consultants is available on the Parish website.</p>	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
23.4	64			Object	There were never any proposed settlement boundaries for Tillington. They were not consulted on then [Options Days?] nor subsequently. As the Parish Council itself said, "Tillington and Tillington Common are both in the countryside and a settlement boundary would not be necessary.	At the time of the Examination in Public of the Herefordshire Core Strategy it was the view of Burghill Parish Council that Tillington and Tillington Common should both be classified as open countryside. However, the adopted version of the Herefordshire Core Strategy includes both Tillington and Burghill in Policy RA1 as housing growth areas. It follows that the designation of a settlement boundary for each of these areas would be appropriate. This draft NDP proposes a settlement boundary for Tillington in order to retain some control over future development.	No change
23.5	64			Object	There are several other sites which are more suitable which need to be properly considered. The Duchy sites are a prime example.	All the Duchy of Cornwall sites were assessed in the process, with Site 21 coming forward into the plan. See also note 2 above.	No change
23.6	64			Object	There is no mains drainage and sewerage. Flooding already occurs in many areas around the site. Any new development will only add more problems regarding flooding and groundwater contamination. Totally ridiculous. Who in their right mind would even think of such a thing?	See response to comment 17 above.	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
23.7	64			Object	The plans for Tillington are a disgrace. Individuals need to be held to account for this appalling lack of proper consultation and democracy!	<p>The Parish Council (a democratically elected body) is the relevant body under Section 61G (2) of the Town & Country Planning Act 1990 to undertake the preparation of an NDP.</p> <p>The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development.</p> <p>Proposed housing sites put forward were assessed through the Site Assessment process. The most favourable were brought forward into the NDP as housing allocations.</p> <p>The current NDP is a draft document on which comments are invited from the community.</p> <p>All potential development sites were displayed at the Options Days in Autumn 2014. Visitors were invited to comment. The comments were taken into account by the Parish Council when assessing the sites and allocating for development.</p>	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
24	64			Object	<p>Area marked 25 on Map 4 would, if developed, cause the surrounding areas including areas 23 and 10 to be overdeveloped.</p> <p>Also, why has the questionnaire result been ignored? Majority voted for 4 to 7 houses per development site and a total of 10% to 11% development and not 18%</p>	<p>Whilst the questionnaire returns favoured sites of 4-7 dwellings (40%) more than 8-10 dwellings (33%), the Herefordshire Core Strategy proposes development at an indicative rate of 30 dwellings per hectare. This would have resulted in 33 dwellings on Site 10, and 17 on Site 25.</p> <p>The PC considered this would have a detrimental impact on the character of the area, and came to the view that 10 dwellings per site was more in keeping with the character of the area</p> <p>The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development, with a figure of 18% growth proposed for the Hereford Housing Market Area (Policy RA1).</p>	No change
25.1	All			Object & Comment	<p>General Comment We are relatively new to the village (moved almost 2 years ago) and therefore missed out on some of the early submissions BUT it is obvious to us that there are heavy leanings towards TILLINGTON for the building of houses. Having discussed with other in detail to</p>	<p>The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development, with a figure of 18% growth proposed for the Hereford Housing Market Area</p>	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
					update us of earlier meetings and events that we missed it seems that (Deleted *****) Things have been pushed aside (Deleted *****)!!	(Policy RA1). The NDP has to be in "general conformity" with the Herefordshire Core Strategy in order to progress further and become part of the Development Plan for the area.	
25.2	20	3.18		Comment	Protection is mentioned – This is good but in the past much land which is supposedly "protected" has been pushed under the carpet where building a housing development. Rules made to be broken! Protection list must be adhered to!!	Comments noted and welcomed. Table 3 of Page 54 of the NDP identifies sites to be protected as Local green spaces.	No change
25.3	22	3.22		Object & Comment	Tillington Village is crossed by two "C" roads in very bad condition and many dangerous pinch points – especially with all the agricultural traffic. Hereford to Weobley & Credenhill to A4110 are both rat runs – Both agricultural and daily work traffic have increased considerably in the two years we have been living here damaging both road surfaces and verges – with little or no drainage on these roads. More housing will make things far more dangerous exiting onto these roads which already have more than enough traffic for small roads.	The maintenance of roads in the Parish is a function of Herefordshire Council. The PC are aware of the inadequacies of local infrastructure. The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development. Sites have been identified through the Site assessment process. However, it is anticipated that developer contributions will address some of the infrastructure issues. See Note 5 & 7 above.	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
25.4	35 &	6.1. 24	P64 Map	Object	<p>SITE 10 TILLINGTON BUSINESS PARK "BROWNFIELD" only a small area of the section shown on the map could be considered "BROWNFIELD". Look at this carefully! (Delete *****)</p> <p>Beyond Site 10 is a BIODIVERSITY SITE (BAP). This has not been made clear on the maps p64 and should not be overlooked!</p>	<p>A section of Site 10 (as submitted) was assessed as being brownfield.</p> <p>The Draft NDP recognises that there are BAP sites within the Parish, however this is a non-statutory designation (see NDP Para 2.34).</p>	No change
25.5	56		B13	Blank	<p>Water Management sounds fine – but impossible to carry out on Sites 10 & 22. Why? 1) If allowed to follow gravity it will pass onto roads already poorly served for drainage. 2) Drainage from septic tanks will find its way onto these roads due to the sort of soil – not very permeable. With the points above, and no mains drainage in Tillington "water management" of the above sites will be almost impossible to achieve.</p>	<p>The existing drainage issues are noted, although modern infrastructure accompanying new development can solve existing problems. Policy SD3 of the HC Core Strategy addresses these matters.</p> <p>See note 7 above.</p>	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
25.6	64		Map	Object & Comment	Low Intensity Leisure Use When/Where has this been mentioned? On map 68 this is part of Plot 22! Where and what is the leisure use if it's a building plot? Clarification please! - or is it (Deleted ***)	The area shown on Map 4 as Local Green Space for a low intensity leisure use is separate from the potential housing sites. The questionnaire returns indicated that 58% of returns suggested encouraging tourism. It is for this function that the PC had in mind when allocating the site next to The Bell.	No change`
25.7	68		Map	Object and Comment	This map has two IMPORTANT ERRORS which must be corrected. PROPOSE BUILDING SITES 10 & 22 are shown overlarge!!! They do not match the map on page 64. Carefully done perhaps!! (Delete***) They must be corrected	The site boundaries for the allocations are indicative. The actual boundary of the site will be determined at the Planning application development stage.	No change
25.8	70			Comment	At bottom of page 5 VITAL POINTS Tillington is particularly affected by points 3,4 & 5 Points 3 & 5 MUST dictate whether or not housing applications are acceptable!	The points in this section are entitled "Design Guidance" and covered in policies in the Core Strategy and the NDP. These will be taken into account when assessing any future planning application.	No change
26.1 to 26.8	As group 25	As group 25	As group 25	Objection and Comment	Materially the same as the submission made by contributor No 25:	Comments as per 25.1 to 25.8.	No change

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27.1	5	1	4.0	Object	Site 10 is a greenfield site, not a brownfield site. It is 0.65 hectares not 1.1 – you have included the Business Park in your figure	A section of Site 10 was assessed as being brownfield, due to historic uses attached to the business park. The Tillington Business Park is not included in the housing allocation. The size of the site is calculated on an OS map base.	No change
27.2	15	15	4.1	Object	Steering Group scored Field Farm (Plot 27) at 2.16 out of 6 and it was 4th most appropriate development. It is 3 dwellings not an isolated dwelling. It is a brownfield (not greenfield) site with 3 farm buildings redundant for more than 10 years and as such would qualify for Permission under a Permitted Development Order. I object to the published score of 6.	Redundant agricultural buildings are not previously developed land (See definition in NPPF). The site is located in open countryside, and not a sustainable location. Permitted development rights do not assess the sustainability of a site, and allow the development of agricultural buildings to dwellings through a prior approval process.	No change
28.1	35	6.1.2 6	OBJ 2	Object	The plans states that the sites at Lower Burlton have the potential to achieve the housing growth at a modest housing density, in line with the aspirations of parishioners and which would also reflect the character and appearance of the parish. I object to this on the grounds that; (A) The plan does not include the outline planning permission (number P160048/O) that is being sought for 50 dwellings in the land between the Tillington and Roman Roads. Add this to the 20 proposed at the Lower	The Plan does not include planning applications that have not yet been determined. Although the sites at Lower Burlton are divorced from services within the Parish, they are close to services in the city. Whilst the questionnaire returns favoured sites of 4-7 dwellings (40%) more than 8-10 dwellings (33%), the Herefordshire Core Strategy proposes development at an indicative rate of 30	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
					<p>Burlton Sites (10 at site 2B and 10 at site 2D) and this means that this small area will absorb 70 new dwellings in a very short space of time. I do not in any way see this as “housing growth at a modest housing density”. This is one small area at the most southern point of the parish absorbing over half of the housing that is required to be developed.</p> <p>(B) This plan does not reflect the feedback from the parish as part of the limited consultation in which most found that 1 to 7 dwellings per site was the “ideal” option (page 19). Both sites 2B and 2D are in excess of 7 dwellings, and the planning being sort for the land between the Tillington and Roman Roads would be seven times larger than what the parish have feedback as to what the maximum they would consider ideal.</p> <p>(C) I query how this may impact on Policy B1 (page 37) that states “In order to retain the character of the Burghill parish, proposals for new housing will be only be considered on an allocated site or within the settlement boundaries identified on Map 2 (Lower Burlton), Map 3 (Burghill), and Map 4 (Tillington), in accordance with the</p>	<p>dwellings per hectare.</p> <p>Whilst a planning application has been submitted, the Parish Council consider it expedient to submit the Burghill NDP with its current allocation of sites as soon as possible. Once submitted, the NDP becomes a material consideration in the determination of planning applications, enabling the Parish to have some control over future development.</p>	

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					Herefordshire Core Strategy and subject to the following criteria: (a) Maintains an appropriate density in context with the immediate surrounding area and not exceeding 25 dwellings per hectare; "		
28.2	45	6.5.1	OBJ 7	Object	<p>This objective is to maintain for the parish a separate identity from the city. I am unable to see how the proposed developments at the Lower Burlton sites (2B and 2D) and the additional planning being sought for development between the Tillington and Roman Road will achieve this. All of these developments are at the very southern edge of the parish and would merely serve to extend the city limits. This is not in line with Policy B9 (page 49) which states "Development proposals will be required to incorporate the following landscape design principles: (a) All development will be expected to retain the green areas between Burghill and Hereford and to maintain the distinct and separate identity of the Parish".</p> <p>Furthermore, Policy B9 states "(c) Local habitats and wildlife corridors should be preserved and where possible enhanced. Landscaping schemes will be required to incorporate planting schemes which use traditional and locally</p>	<p>Although the sites at Lower Burlton are divorced from services within the Parish, they are close to services in the city, and seen to be a sustainable location.</p> <p>The effect of proposed development on wildlife will be assessed at Planning Application stage through supporting documentation submitted.</p>	<p>No change</p> <p>No change</p>

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					<p>appropriate species to support and where possible enhance biodiversity. Species should be appropriate to the location and setting in terms of type, height, density and the need for on-going management. When constructing boundaries native tree species should be used. Existing hedgerows should be retained and the establishment of new native hedges is encouraged to support and protect wildlife. (d) Development proposals should conserve important local landscape features and species where possible. Mature and established trees should be retained and incorporated into landscaping schemes where possible." I am of the understanding that there is a Tree Preservation order that applies to the proposed site 2B. As a nearby resident I am also extremely concerned about the impact of such a large development (I consider 10 dwellings to be large) on the local wildlife and ecology. My family have observed a wide range of wildlife in the area which includes; rabbits, foxes, pheasants, birds of prey, wood peckers, squirrels, song thrushes, robins, blackbirds, coal tits, blue tits and mice plus numerous dragon flies, grasshoppers and butterflies.</p>		

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28.3	50	6.6.1	OBJ 5	Object	<p>The Burghill Neighbourhood Development Plan's community facilities and open spaces policies seek to deliver the following objectives: Objective 5 - To support local amenities such as the shop, pub and village hall for the present and future benefit of the community. I do not believe that the proposed developments at site 2B and 2D, and the planning being sort for 50 houses between the Tillington and Roman Roads will achieve this. If these 70 houses were to be built at this most southern edge of the parish, it is my belief that the occupants would identify themselves as part of the Three Elms / Hereford community and not that of Burghill. For example, it is unrealistic to suggest that the occupants of these dwellings would travel from the city outskirts into the village centre to access the shop when there is a supermarket within walking distance. It is likely this would be the case for children and the primary school, would they wish to enrol in a school that would require a car journey when there is a large, well-resourced primary school within walking distance? It may be reasonable to believe that some of the occupants will use the village</p>	Comments noted.	No change

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					hall for its various activities and possibly even the pub for its food...but I think the impact would be so minimal it would be farcical to suggest these developments would support the local amenities in the long term.		
28.4	50	6.6.1	OBJ 5	Object	The Burghill Neighbourhood Development Plan's community facilities and open spaces policies seek to deliver the following objectives: Objective 6 - To preserve and where possible enhance leisure facilities such as the playground and sports grounds. I can see that the plan has made consideration to this, however my objection to this is that there is no detail of any "enhancement" in the new areas for developments. Specifically, I can see no evidence that leisure facilities will be built into the developments at site 2B and 2D, nor in the site between the Tillington and Roman Roads. Once again, these dwellings at the most Southern edge of the parish will be looking to its neighbouring parishes community facilities. This does not aid the retention of the Burghill Parish identity.	The NDP seeks to enhance community facilities. However, it cannot specify how these will be enhanced due to viability considerations which will be assessed at the Planning application stage.	No change

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28.5	65	6.7	OBJ 2 & 3	Object	<p>Paragraph 6.7.2 states "Policy SD3 of the Herefordshire Core strategy states that measures for sustainable water management will be required to be an integral element of new development in order to reduce flood risk; to avoid an adverse impact on water quantity; to protect and enhance groundwater resources and to provide opportunities to enhance biodiversity, health and recreation."</p> <p>As a resident of a property that backs onto the proposed development site 2B I am very concerned about the risk of flooding and that we have not been fully consulted about the proposed development. Currently 4 houses share a septic tank and 'soak aways' that are situated in the field 2B. Over the last couple of years, with the heavy rainfall we have had this field has become flooded several times and for months at a time has been heavily waterlogged. On one occasion the ground was so heavily saturated that the septic tank was underwater. To develop this small area of land with 10 dwellings would further decrease the areas ability to absorb water and increase the risk of flooding to the dwellings (both existing and new), it may also render our septic tank unworkable. A further impact if this were to happen would be that our 51 times would decrease in value, our insurance premiums increase and this may leave us in a position where we are unable to insure or sell</p>	<p>The existing drainage issues are noted, although modern infrastructure accompanying new development can solve existing problems.</p> <p>Policy SD3 of the HC Core Strategy addresses these matters.</p> <p>See note 7 above.</p>	No change

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29	28	5	5.3	Comment	<p>We can see a lot of work has gone into developing the Neighbourhood Development Plan.</p> <p>Section 5: Methodology seems to set out a clear and defined way of scoring sites offered for development. This has been corroborated by Kirkwells, so we are happy that the correct procedures have been followed.</p> <p>Section 6: NDP Policies for Burghill Parish. Following the options day local objectives have been clearly outlined in 6.1.1.</p> <p>This being said it is presumed that the development of sites 22, 10 and 25 will include road widening and footpaths along the Tillington Road between Crowmoor Lane junction and the Bell Inn Public House in any planning application?</p>	Comments noted and support welcomed.	No change
30	35	6.1.2 4		Comment	<p>My comment is that there seems to be rather a concentration of development in Tillington (described as a compact housing group), along with the permitted development in Crowmoor Lane (development of the agriculture buildings which will almost double the number of houses and cars on the single track lane converging onto the crossroads which have limited visibility and very difficult to cross at busy times of the day.</p>	<p>The Herefordshire Core Strategy identifies both Burghill and Tillington as sustainable settlements which will be the main focus of proportionate housing development.</p> <p>Proposed housing sites put forward were assessed through the Site Assessment process. The most favourable were brought forward into the NDP as housing allocations.</p>	No change

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					<p>Proposed houses behind the shop – how would the effluent / sewage be handled? The water level in Bird Pool following rain is controlled flowing into the cellar of Bird House then being pumped onto Crowmoor Lane which is always wet or icy in cold weather.</p> <p>Also additional vehicles on this notorious cross road with very limited visibility.</p> <p>I do not object to this 'brown field' development providing the above can be taken into consideration in the planning application.</p> <p>The shop is being used as a reason why houses should be built at Tillington but its long term future must be of question as it is owned by (Text Deleted *****)</p> <p>My other concern is the other areas which have been put forward in Tillington which are two 'Greenfield areas' i.e. the road frontage between the Bell and the shop and also Cherry Orchard – a lot of extra cars onto a road with limited visibility and again drainage issues.</p>	<p>With regard to the inadequacy of services/infrastructure in Tillington, the Parish Council shares these views. However, it is anticipated that developer contributions will address some of these issues.</p> <p>See Note 5 & 7 above.</p>	
31	36	6.1	B1	Comment	If planning permission is granted for a significant number of houses in the parish, before the NDP. is finalised, an allowance should be made for	Whilst a planning application has been submitted, the Parish Council consider it expedient to submit the Burghill NDP with its	No change

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					<p>this. Otherwise the parish could end up with far more houses than necessary.</p> <p>I would suggest the N.D. P. Steering Group and Parish Council discuss this and as a starting point I suggest omitting site numbers 25, 2b and 21 from the settlement boundaries. This would be fair to all areas of the parish and uses the feedback percent figures to decide which areas to delete.</p> <p>Unless something similar to this is decided, the NDP. could be blamed for creating far more houses than the parish wants or is required to have.</p>	<p>current allocation of sites as soon as possible. Once submitted, the NDP becomes a material consideration in the determination of planning applications, enabling the Parish to have some control over future development.</p>	
32	53-56	6.6.1 5	B10	Object	<p>Why has the potential access road from Leasown to the potential development site on the Co-Op Farm been blocked by the extension of the "Green Space" across the verge? On what authority?</p> <p>This appears to be an underhand ploy to prevent using otherwise suitable land for housing development.</p> <p>I object most strongly to this multi-faceted strategy to avoid placing housing development in any of the suitable and available sites in the existing settlement (i.e. Burghill), and instead dumping what is effectively Tillington New Town in a</p>	<p>The space has been designated as Local Green Space to preserve the character of the existing development and its enclosing fringes.</p> <p>Site 35 was assessed through the Call for Sites and Site Assessment process and did not score favourably.</p> <p>The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development.</p>	No change

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					scantily populated area of countryside – where there are few residents to raise objections. See also comment reference 35		
33.1	31	5	1	Comment	The housing target growth of 18% imposed by the Herefordshire Local Plan Core Strategy is a minimum figure and should be referred to as such. Similarly, the indicative growth target figure (currently 60, subject to amendment) should again be referred to as a minimum. I would question the figure of 20 houses arising from windfall sites. Windfall sites are by definition a diminishing resource as many obvious infill plots and barn conversions have already been developed within the Parish. Also, the target growth figure in the HLP Core Strategy is already a net figure having made an allowance for windfall sites from the overall housing target figures, so make a further allowance at this stage is in effect double counting.	Comments noted.	No change
33.2	37	30	1	Support	I support the allocation of approximately 10 houses on site number 2B Lower Burlton and as agent for owners can confirm that the site is suitable, achievable and available for residential development with no constraints.	Comments noted and support welcomed.	

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34	1	1	1	Object	<p>I would like to OBJECT to the Burghill Neighbourhood Development Plan based on the following: -</p> <ol style="list-style-type: none"> 1. Proper consultation of the Parishioners has not taken place, especially of those directly affected by the proposed sites. 2. The plan does not take into consideration other neighbouring sites within the parish, which have an overall effect on the density of development in relatively small areas. For example, the proposed CBRE site, which would provide much of the parish development quota on its own. 3. I believe the developments at Lower Burlton will result in the city boundary effectively being extended. 4. The developments proposed are far too large and are not consistent with Parishioners wishes of smaller developments (1-7 houses). 5. The developments proposed are in small linked areas effectively creating much larger overall developments <p>. Very little thought seems to have been given to the volume of traffic being concentrated in the development areas. Both sites at Tillington and Lower Burlton would suffer from the increased amount of</p>	<p>The sites brought forward into the Draft NDP were put forward for assessment during the questionnaire process. All sites put forward were assessed against a number of criteria and scored accordingly.</p> <p>In addition, comments were invited on the proposed sites at the Option days' consultation in October 2014.</p> <p>Whilst the questionnaire returns favoured sites of 4-7 dwellings (40%) more than 8-10 dwellings (33%), the Herefordshire Core Strategy proposes development at an indicative rate of 30 dwellings per hectare.</p> <p>Access, traffic and highway improvements will be assessed during the planning application process.</p>	No change

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					<p>traffic. The site at Tillington is adjacent to two historically dangerous junctions at The Bell and The Bird, where there have in the past been many accidents, is it wise therefore to so drastically increase the amount of traffic at these junctions?</p> <p>7. I would be very interested in clarification on how the settlement boundaries were arrived at and who decided on them, there appears now details of this and local residents do not appear to have been consulted for input.</p> <p>8. I am very concerned that the site at 2B Lower Burlton results in backyard development, something stated as being preferably avoided in the policies drawn up.</p> <p>9. The wealth of wildlife experienced daily at the Lower Burlton sites will be lost and this is something that cannot be replaced for existing residents. Most purchased their properties for the reason of countryside to the rear any development behind properties will destroy the character of the properties completely.</p> <p>10. Drainage at all sites needs to be seriously considered, some have been known to flood in the past. It would seem to most previously</p>	<p>The settlement boundary for Lower Burlton and Burghill is based on the boundaries identified in the UDP and allocated sites in the draft NDP. The proposed settlement boundary for Tillington is the existing built form and sites allocated in this Draft NDP.</p> <p>The effect of proposed development on wildlife will be assessed at Planning Application stage through supporting documentation submitted.</p> <p>With regard to the inadequacy of services/infrastructure in Tillington, the Parish Council shares these views. However, it</p>	

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					<p>effected by such events, these sites seem totally unsuitable. Even if mains sewage was installed I do not believe all surface water problems would be alleviated and annual cost for such drainage would increase household expenses for existing as well as any new parishioners.</p> <p>11. The site at 2B Lower Burlton is identified in my house deeds as "The Quarry", which no doubt indicates a possible use of the site in the past. I personally would not wish to buy a property erected on a former quarry and this alone requires further investigation.</p> <p>12. Given the proximity of the Lower Burlton sites to other previously suggested sites, I would be very concerned that the currently suggested sites would in the future be extended to include more large development, i.e. the site at 2C. The overall affect on the area would certainly not be in keeping with a village feel, again increasing the likelihood of the city boundary being extended.</p> <p>13. Any proposed increase to residents of this parish must be backed up by evidence that the parish can cope with the increase. The roads throughout the parish need resurfacing BEFORE any</p>	<p>is anticipated that developer contributions will address some of these issues.</p> <p>Comments noted</p> <p>Comments noted</p> <p>The Herefordshire Core Strategy identifies Burghill and Tillington as sustainable settlements which will be the main focus of proportionate housing development, with a figure of</p>	

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					<p>increase in traffic, the churchyard MUST have an extension in place (not just a possible extension) there is not enough room for current parishioners to be buried, the school needs specific assessment to determine how many additional children could be accommodated.</p> <p>14. The whole process of this development plan, the lack of communication and consultation of people directly affected, and the difficulty of this form for commenting and objecting have unfortunately resulted in a great deal of loss of faith in our current Parish Council members and their ability to truly represent the views and concerns of their Parishioners.</p>	<p>18% growth proposed for the Hereford Housing Market Area (Policy RA1). The Lower Burlton sites are close to services within the city.</p> <p>The Parish Council have carried out consultation in accordance with the Regulations. This has included a questionnaire and Options Days in October 2014. From these consultations, the draft NDP was formed taking into account wishes of residents. As part of this consultation, comments have been invited from residents on the draft NDP. See note 6 above.</p>	
35	63	1	1	Object	<p>The proposed development includes a major proposal for development on green field land in the "Tillington Business Park" area. This is wholly inappropriate (and actually goes against so-called policy "B1(a)") because –</p> <ul style="list-style-type: none"> * The scale of development is far in excess of the 4-7 units preferred by respondents to the questionnaire; * The neighbourhood is lightly populated and so will be radically changed by a development on the proposed scale * The site is on the highest ground 	<p>Whilst the questionnaire returns favoured sites of 4-7 dwellings (40%) more than 8-10 dwellings (33%), the Herefordshire Core Strategy proposes development at an indicative rate of 30 dwellings per hectare.</p> <p>The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development.</p>	No change

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					<p>in the immediate vicinity and will be highly visible (a "blot on the landscape" even) for a significant distance around, permanently changing the character of the area</p> <ul style="list-style-type: none"> * Significant further development is likely to be sought after major investment in necessary infrastructure by Welsh Water * Such development will certainly amount to the creation of a new village settlement – "NEW TILLINGTON" * The proposal is therefore DISPROPORTIONATE and INAPPROPRIATE – and without consultation of residents <p>The overall proposal totally ignores the option of retaining new development in the existing settlement of Burghill, i.e. the Copse-Leasown area and the area North of Home Farm, which are both natural organic expansions of the village.</p> <p>This response format, with "required data" of page numbers etc. blocks submission through "validation errors"; the option of "object" or "comment" but not both, is not appropriate for village consultation and discourages participation.</p> <p>Change it to something simple and conducive to resident involvement.</p>	<p>Proposed housing sites put forward were assessed through the Site Assessment process. The most favourable were brought forward into the NDP as housing allocations.</p>	

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36	36	6	1	Object	<p>I object to the proposed housing near Redstone (NDP Site No: 21) for the following reasons;</p> <p>1) Our potential outlook obscured. 2) Potential depreciation of our property value (as already experienced when Manor Fields was developed). 3) Concerns about a safe access to the proposed site. 4) Lack of pathways. 5) Already the most compact group of housing in the local area.</p>	Proposed housing sites put forward were assessed through the Site Assessment process. The most favourable were brought forward into the NDP as housing allocations.	No change
37.1	35	6.1.2 5		Object	At no stage do I remember being asked about the settlement boundary. Who decided it and where it should go. Surely residents should have been consulted about something that important.	<p>The settlement boundary for Lower Burlton and Burghill is based on the boundaries identified in the UDP and allocated sites in the draft NDP. The proposed settlement boundary for Tillington is the existing built form and sites allocated in this Draft NDP.</p> <p>As part of this consultation, comments have been invited from residents on the draft NDP</p>	No change
37.2	36	6.1.3 0	B1	Object	My complaint is regarding development at the business park and want clarification as to where the houses would be. Do the houses look out to the existing buildings in the BP? Also with the new housing you look at sewage and waste water. On an incline the run off	The detail of the layout and drainage/infrastructure issues will be the subject of a future planning application	No change

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					needs to go somewhere and with the constant flooding at the Crowmoor Lane and outside Domino House crossroads, it would suggest mains sewage would be required and the disruption that would be caused.		
38	All			Objection and Comment	Burghill Weobley Road and Tillington Road through to Credenhill the cars using these roads a lot of them are driving over the speed limit. Also getting heavy goods vehicles and large farm machinery. It's getting unsafe to be able to walk on these roads without standing in the hedge. The local council and Hereford Council need to look where is the septic tank drainage and rain going to go filter through and end up down towards Rogers Cross which already floods badly also Tillington Road below where I live we experience enough problems now without surface water after heavy rain as it runs off the road and down our drive into our barn and outbuildings. There is a council manhole grated cover and drain which goes nowhere. Council men have looked and done nothing.	The management and maintenance of highways and their drainage is not a matter or function of the Parish Council. See note 7 above	No change

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39	36 and 64	6.1.30 and map envelope	B1	Support, Object & Comment	<p>In the Site Assessment Report produced by Kirkwells Site 22 is graded equal first in the whole parish with one other site in Burghill. This assessment included consideration of the combined areas as one. The Draft Plan only shows part of Site 22 within the settlement boundary and only road frontage development is being proposed for development. Given the relationship of this site to the road, structures and geography of this part of Tillington, the settlement boundary appears to be drawn up in an arbitrary manner.</p> <p>The steering group do not agree with Kirkwells assessment and we do not agree with your revised assessment total. Below is our assessment and explaining clearly, reasons why we consider Kirkwells to be more accurate. Road frontage development is totally inappropriate for Site 22.</p> <p>When considering site assessments, a helpful reference document produced by Herefordshire Council is the Neighbourhood Guidance Note No. 21. A link to this document is attached.</p> <p>This document directs parishes to eliminate unsuitable sites and lists the following criteria:</p>	<p>Comments noted and support welcomed.</p> <p>Through the Site Assessment process, both sites achieved a high score.</p> <p>The PC is however mindful of the questionnaire return which favoured attracting tourism to the area and the proposed allocations are through to be a suitable result.</p>	No change

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					<p>Compliance with the Core Strategy RA1 in the CS, identifies Tillington as a settlement for proportional housing development. The location of this site and its relationship in the heart of the settlement makes it highly compliant.</p> <p>In addition, the site is in accord with the National Planning Policy Framework (NPPF) document. The NPPF directs rural areas to promote sustainable development and to locate housing where it will enhance, or maintain, the vitality of rural communities. Site 22 clearly does that.</p> <p>Flood Risk The Environment Agency flood map confirms there is no risk of flooding to this site.</p> <p>Proximity to and impact on national and international nature conservation designations. Although adjacent to a BAP, Site 22 as land likely to be considered for development would not adversely affect the BAP.</p> <p>Deliverability The site is available and is capable of being developed and built within the plan period.</p> <p>Other criteria Contaminated land The land has no known</p>		

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					<p>contaminants.</p> <p>Transport and highways access</p> <p>A suitable vehicular access is available and can be demonstrated as such. It would also include an element of betterment to the existing access into The Bell. Good community facilities within the locality are all within walking distance of the site.</p> <p>Proximity to shops, employment and public transport</p> <p>The site is adjacent to a bus route. It is located next to a public house, a business park, a shop and within easy walking distance of the local school.</p> <p>Impact upon the landscape and the wider environment</p> <p>The site, although on rising ground, is surrounded by mature hedgerows and buildings. Keeping the hedge intact along the main road boundary of the site preserves the existing character of Tillington. The site is contained within a central triangulated road layout and so forms a natural barrier regarding further spread into the adjacent countryside. It also helps to consolidated the heart of this settlement.</p> <p>Visual impact</p> <p>See above. This will be minimal and</p>		

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					<p>concealed by the existing hedgerows, buildings and road system.</p> <p>Connection and availability of utilities such as water supply and drainage</p> <p>Water, electric and gas mains supplies are available to this site.</p> <p>There is no mains drainage within this settlement and the whole development will be reliant of a treatment plant that can be located on land within the whole of this site identified as No. 22 in BNDP.</p> <p><u>Conclusion</u></p> <p>The site conforms to the above criteria and confirms that the whole of this site must be considered very suitable for inclusion within the NDP.</p> <p>The adjoining Site 10 also has a contribution to make, but not at the expense of losing the business park and shop. Combined, Sites 22 and 10, would help Tillington to develop a strong central identity and allow better pedestrian links to all other aspects of this settlement.</p> <p>When considering the inclusion of Site 22, we would be pleased if the steering committee/parish council will afford us the opportunity to address them and answer all questions that</p>		

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40	Map 2 page 62			Comment	The Lower Burlton settlement boundary does not reflect the site submission on page 68 for Site 2E. What is the point of consultation if housing is then built on areas which have not been designated?	Site 2E was assessed through the Site Assessment process and scored less favourably than others and was therefore not brought forward as an allocation in the draft NDP.	No change
41	Maps 2 and 4			Objection	There are many reasons which I'm sure we do not have to go into detail about. We are situated right in the middle of the biggest development being proposed at the moment and have not been consulted in any way. I am confused that Lower Burlton and Tillington are taking the majority of the housing with an area with no mains drainage and sewerage we think could impact on us.	All sites submitted were assessed through the Site Assessment process. This resulted in the most favourable sites being brought forward as allocation in the draft NDP.	No change
42.1					These representations are submitted on behalf of Farmcare Ltd which owns, manages and farms the Tillington Estate which includes much agricultural land and buildings within Burghill Parish. This letter is submitted in response to the current public consultation on the draft Burghill Neighbourhood Development Plan (BNDP) which commenced on 20 January 2016 and was due to end on 2 March 2016. As you are aware, we requested that the consultation period be extended until 16 March 2016 because the Site Assessment Report (SAR),	The submission version of the Burghill Neighbourhood Plan will be accompanied by a Basic Conditions Statement detailing how the NDP satisfies the Basic Conditions of the Town & Country Planning Act 1990 as amended by the Localism Act 2011.	No change

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					<p>which forms part of the evidence base for the Plan, was not made available until 22 February 2016. The SAR is referenced within the BNDP and informs the preferred list of 'candidate sites for allocation'; therefore, it is essential that we had the opportunity to consider this information fully. The Parish Council agreed to extend the consultation period to 11 March 2016 by e-mail dated 26 February 2016.</p> <p>National planning policy guidance and legislation relating to neighbourhood plans requires the such documents and their policies to be in general conformity with the adopted Development Plan for the relevant local authority area. The Town and County Planning Act 1990 (TCPA 1990) and, in particular, Schedule 4B deals with the process for making neighbourhood development orders and plans. The BNDP must meet the 'Basic Conditions' as set out at paragraph 8 (2) TCPA 1990 which include:</p> <ul style="list-style-type: none"> • The Plan has regard to national policies and advice contained in guidance issued by the Secretary of State; • The Plan contributes to the achievement of 		

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					<p>sustainable development;</p> <ul style="list-style-type: none"> • The Plan is in general conformity with the strategic policies contained in the development plan for the area; • and, • The Plan does not breach and is otherwise compatible with EU obligations. <p>Having considered the draft BNDP in detail, it is contended that the Plan does not meet all of the Basic Conditions, namely having regard to national policies and advice and general conformity with the strategic policies of the Development Plan for Herefordshire. This is considered below. In addition, consideration is given to the SAR, in particular the findings relating to the sites submitted by Farmcare and the proposed sites for allocation. It is not considered that this report provides a robust evidence base for determining which sites are most sustainable.</p>		
42.2					<p><u>Does the BNDP have regard to National Policies and Advice?</u> The National Planning Policy Framework (NPPF) encourages local communities to prepare</p>	The settlement boundary for Lower Burlton and Burghill is based on the boundaries identified in the UDP and allocated sites in the draft NDP.	No change

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					<p>Neighbourhood Plans to ensure that they get the right types of development for their community. In applying the presumption in favour of sustainable development, paragraph 16 requires that Neighbourhood Plans 'plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan.' <u>Settlement Boundaries for Tillington and Burghill</u></p> <p>The NPPF establishes a strong presumption in favour of sustainable development that has implications for how communities engage in neighbourhood planning. It requires communities to plan positively and for 'all plans to be based upon and reflect the presumption in favour of sustainable development' (para 15, NPPF).</p> <p>The Planning Practice Guidance states that local authorities should support sustainable rural communities by encouraging proportionate growth:</p> <p>'Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in</p>	<p>The proposed settlement boundary for Tillington is the existing built form and sites allocated in this Draft NDP.</p> <p>This facilitates a level of growth appropriate to the Parish and in "general conformity" with the Herefordshire Core Strategy.</p>	

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					<p>delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.' (Paragraph 001, Reference ID: 50-001-20140306)</p> <p>The adopted Herefordshire Core Strategy explicitly identifies Tillington and Burghill as settlements where proportionate housing growth is considered to be appropriate. However, the proposed settlement boundaries are drawn tightly around the existing built up area of the villages; indeed, the boundary for Tillington comprises only a very small proportion of the Village. This type of approach has been found to be contrary to the provisions of the NPPF.</p> <p>The Examiner's Report concerning the Rolleston-On-Dove Neighbourhood Plan Examination identified that the proposed tightly drawn settlement boundary in this case failed to plan positively to support local development and, as a consequence, it was contrary to the NPPF and was recommended for deletion.</p>		

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					<p>Herefordshire Council's Neighbourhood Plan Guidance Note 20 entitled 'Guide to Settlement Boundaries', states that 'settlement boundaries should be drawn to facilitate an appropriate level of proportional growth within the plan period.</p> <p>If land within the boundary is not formally allocated, there will be a requirement to demonstrate that there is enough available capacity within the boundary to enable development to take place.' The Guidance Note is clear that settlement boundaries should not be crude and inflexible but instead they should seek to 'ensure a more plan- led and controlled approach to future housing growth, allowing for allocating sites within your village rather than windfalls.' (p.3).</p> <p>Burghill has an existing settlement boundary and Tillington does not. The proposed amendments to Burghill and the new boundary proposed for Tillington are tightly drawn around existing built forms. Accordingly, there is little opportunity for any windfall development. Indeed, it is not clear what analysis has been undertaken of infill and/or windfall development opportunities in either Village in</p>		

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					<p>order to inform the proposed settlement boundaries.</p> <p>Paragraph 6.1.20 of the BNDP states that 14 windfall units are already known; however, evidence to qualify this figure is not provided. The nature of the built settlements is such that there is little development beyond the highway. In Tillington, for instance, the boundary is also unduly inflexible with its focus on small clusters of buildings along the highway; thus, limiting the potential for windfall sites through infill. There are few opportunities for development on backland or in gardens and while opportunities do exist for infilling, these would not be forthcoming as a result of the currently proposed settlement boundary.</p> <p>Various development opportunities have been submitted to the Parish Council, which could deliver sensitive development, proportionate to the existing settlements. The BNDP seeks to draw a settlement boundary around Tillington; naturally, this will need to reflect the allocated sites.</p> <p>In summary, the settlement boundaries, as proposed, would not facilitate an appropriate level of proportional growth in Tillington and</p>	<p>Whilst the Parish Council are aware of 14 windfall sites that may come forward during the plan period, these have not yet been submitted as planning applications. As and when the applications come forward, they will be determined through the relevant policies/legislation.</p> <p>The windfall sites that have come through the Submitted Sites and the Site Assessment Process are identified in Appendix 7.</p> <p>The Parish Council consider that as the windfall sites are within open countryside/conversions, they are not appropriate for allocation in the Burghill NDP.</p>	<p>Amend plan to include reference to Appendix 7 in para 6.1.20</p>

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					<p>Burghill. The BNDP states that there is potential for 20 dwellings to come forward on windfalls sites but this does not appear to be supported by an assessment of available capacity to demonstrate that this is achievable.</p> <p>Furthermore, it is contended in the following sections that the housing requirement is higher than indicated in the BNDP and the site assessment supporting the proposed site allocations is not robust. The settlement boundaries may, therefore, need to accommodate different sites.</p> <p>For the above reasons the BNDP fails to have full and proper regard to national policies and advice contained in guidance issued by the Secretary of State and does not pass this first Basic Condition.</p>		
42.3					<p><u>Contribution Towards the Achievement of Sustainable Development</u></p> <p>In order to meet the second Basic Condition, the NDP needs to demonstrate that the proposed site allocations are the most sustainable options. With regard to site allocations, the BNDP is supported by a SAR (September 2015) prepared by Kirkwells. This document seeks to assess the</p>	<p>The site assessments were carried out by Kirkwells Ltd. The scoring criteria is based on a criteria used industry wide to assess suitability of sites for future development.</p> <p>The Site Assessment Reports details the methodology on how the site assessments were carried out. The selection of these criteria was based on the</p>	No change

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					<p>potential suitability and availability of the submitted housing sites although concerns are raised with the consistency of this assessment. In support of this, reference should be made to the recent (March 2016) decision of Aylesbury vale District Council not to contest a legal challenge made by a Developer to the Haddenham Neighbourhood Plan. In this case, the Developer, Lightwood Strategy Ltd, provided evidence that errors were made in the scoring system used to allocate areas for development in the neighbourhood plan and that the plan had failed to reflect Aylesbury Vale's strategic housing requirement for the area. The same is contended with regard to the SAR and this is explored further below.</p> <p>Eight sites, numbered 34 – 41 on the Plan included on p. 69 entitled Burghill NDP Submitted Sites Burghill Parish & Neighbourhood Area Late Submissions, were submitted on behalf of Farmcare during the 'call for sites' exercise carried out by the Parish Council in May 2014. These sites, together with those proposed as residential allocations, are the focus of the representations.</p> <p>Before analysing the SAR, for</p>	<p>guidance produced by Herefordshire Council.</p> <p>Sites 37 and 38 are in open countryside and therefore not seen to be a sustainable location.</p> <p>As both the NPPF and the Herefordshire Core Strategy have a presumption in favour of sustainable development, the further scoring of sites in open countryside is not appropriate.</p> <p>The Burghill NDP includes sufficient sustainably located sites to accommodate the required level of growth for the plan period and is in general conformity with the Herefordshire Core Strategy.</p>	

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					<p>clarification, please note that Farmcare is aware that the purpose of a 'call for sites' exercise is to make the Parish Council aware of all land / sites that are deliverable for development i.e. suitable, available and achievable, within the neighbourhood plan area. It understands that whole or parts of submitted sites may be allocated. Accordingly, a range of sites were submitted in order to provide the Parish Council with as many options for consideration as possible. Farmcare did not anticipate and has no expectation that all of the submitted sites be allocated; it understands that the aim of the BNDP is to allocated sites to ensure that the level of growth identified by the Core Strategy will be delivered in a timely manner during the Plan period.</p> <p>The SAR states that its assessment criteria are informed by Neighbourhood Planning Guidance Practice Note 21 (Guide to site assessment and choosing allocation sites), although this is not clear from the report and the assessment tables.</p> <p>The constraints criteria are confusing; surely this should identify constraints that prevent</p>		

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					<p>development and it is these more significant constraints that should then be scored. It is noted that several of the 'recommended sites' are identified as having 'significant constraints'.</p> <p>Notwithstanding that, it is considered that the eight Farmcare sites have been scored too high, particularly in relation to their 'constraints'. Detailed comments have been made with regard to each of the submitted sites in the tables enclosed with this letter (Table 1 and Table 2). A summary table, overleaf, compares the scores determined by Kirkwells with the score determined by Savills for Farmcare sites (white) and allocated sites (blue).</p> <p>As the above table indicates, the Savills Score for the Farmcare sites fall within the Kirkwells scoring range (2.25-3.25) for those sites that were identified as the 'best sites' and recommended to the Parish Council in Section 4 of the SAR.</p> <p>The tables enclosed with this letter provides a more detailed assessment of the above identified sites, in comparison to the Kirkwells assessment. This highlights the errors made in the scoring system.</p>		

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					Indeed, evidence of the rationale behind the scores attributed to all the assessed sites in the Kirkwells report is severely lacking. For instance, two of the Farmcare sites (nos. 37 and 38) were immediately ruled out before any detailed assessment of their constraints, access and impacts. On this basis, it is our view that the site assessment report currently does not evidence a robust assessment of the submitted sites and, therefore, the current scores cannot be relied upon. As such, it is requested that new, clear assessment criteria are established and the exercise is repeated. For the reasons set out above, the BNDP fails to contribute towards the achievement of sustainable development.		
42.4					<p><u>Does the BNDP Conform to the strategic policies of the Development Plan?</u></p> <p>The Council's Neighbourhood Planning Guidance Note 31 is concerned with conformity with the Herefordshire Core Strategy and states:</p> <p>'Housing policies and proposals (including allocations) in Neighbourhood Development Plans will need to be minded to the Policies RA1 and RA2 of the Local</p>	Comments noted	No change

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					<p>Plan - Core Strategy and local evidence including local needs surveys, Strategic Housing Land Reviews and environmental capacity.</p> <p>It also states that 'Neighbourhood planning is not a tool to stop development and, or undermine or object to the strategic policies and proposals to the Local Plan - Core Strategy; it is about shaping the development of a local area in a positive manner.'</p> <p><u>Development Plan</u></p> <p>The Development Plan for Herefordshire includes the Herefordshire Local Plan Core Strategy 2011 – 2031 (2015) and 'Saved Policies' of the Herefordshire Unitary Development Plan (2007).</p> <p>The Core Strategy proposes broad strategic directions for growth and does not allocate sites; instead, site allocations and more detailed policies will follow in the Hereford Area Plan, the Bromyard Development Plan and Neighbourhood Development Plans.</p> <p>The Core Strategy sets a minimum housing requirement of 16,500 dwellings for Herefordshire over the plan period up to 2031 (Policy SS2 – Delivering new homes). This includes a minimum of 5,300</p>		

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					<p>dwelling in rural areas. Paragraph 4.8.8 states that housing development in rural areas will be delivered through Neighbourhood Development Plans, any required Rural Areas Site Allocations Development Plan Document and a combination of existing commitments and windfall development.</p> <p>Policy RA1 requires 5,300 new dwellings to be delivered in rural areas, across seven Housing Market Areas (HMAs). It states that 'new dwellings will be broadly distributed across the County's rural areas on the basis of these HMAs'. It continues that 'the indicative housing growth targets in each of the rural HMAs will be used as a basis for the production of NDPs'. It is important to note that the figures are indicative and form only a basis for NDPs.</p> <p>The minimum target represents a level of growth as a percentage and which is proportionate to existing HMA characteristics. Tillington and Burghill are within the Hereford HMA, which will deliver approximately 18% of the indicative housing growth figure. This equates to approximately 1870 dwellings.</p> <p>Policy RA2 is concerned with where</p>		

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					<p>new housing will be located in identified settlements outside Hereford and the market towns. It states that:</p> <p>'To maintain and strengthen locally sustainable communities across the rural parts of Herefordshire, sustainable housing growth will be supported in or adjacent to those settlements identified in Figures 4.14 and 4.15. This will enable development that has the ability to bolster existing service provision, improve facilities and infrastructure and meet the needs of the communities concerned.</p> <p>The minimum growth target in each rural Housing Market Area will be used to inform the level of housing development to be delivered in the various settlements set out in Figures 4.14 and 4.15.</p> <p>Neighbourhood Development Plans will allocate land for new housing or otherwise demonstrate delivery to provide levels of housing to meet the various targets, by indicating levels of suitable and available capacity.' Figure 4.14 lists the 119 settlements which have been identified across the County to be the main focus of proportionate housing development in the rural areas; 23 of these are in Hereford</p>		

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					<p>HMA. Within Burghill Parish, the settlements of Tillington and Burghill are identified and, therefore, the BNDP must have appropriate flexibility to apportion the minimum housing requirement between them. Policy RA2 continues that:</p> <p>'Housing proposals will be permitted where the following criteria are met:</p> <ol style="list-style-type: none"> 1. Their design and layout should reflect the size, role and function of each settlement and be located within or adjacent to the main built up area. In relation to smaller settlements identified in fig 4.15 proposals will be expected to demonstrate particular attention to the form, layout, character and setting of the site and its location in that settlement and/or they result in development that contributes to or is essential to the social well-being of the settlement concerned; 2. Their locations make best and full use of suitable brownfield sites wherever possible; 3. They result in the development of high quality, sustainable schemes which are appropriate to their context and make a positive contribution to the surrounding environment and its landscape setting; and 4. They result in the delivery of 		

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					<p>schemes that generate the size, type, tenure and range of housing that is required in particular settlements, reflecting local demand.'</p> <p><u>Burghill Neighbourhood Development Plan</u></p> <p>The BNDP refers to the Core Strategy housing requirement at paragraphs 6.1.16 – 6.1.20 and explains how it applies an 18% growth target based on the existing number of dwellings within Burghill Parish. It must be recognised that the Core Strategy repeatedly states that the growth set out as minimum figures that should be used as a guide for NDPs.</p> <p>There are a number of policies that do not currently conform to national policies and advice and are not in general conformity with the strategic policies contained within the Herefordshire Development Plan. Accordingly, the BNDP does not achieve the Basic Conditions required by the TCPA 1990. In particular, policies B1, B4 and B10 do not conform for the reasons discussed below. Recommendations are made in order to overcome the issues identified.</p>		

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42.5			B1		<p>Core Strategy Policy H2 Rural Exception Sites supports proposals for affordable housing schemes in rural areas on land that would not normally be released for housing where it meets the criteria contained within. Accordingly, the above Policy should be amended to include exception sites as well as allocated sites and land within the settlement boundary.</p> <p>With regard to the allocated sites, once found to be sound, these should be listed within the Policy for clarity and ease of reference.</p> <p>A number of criteria contained within the Policy are not consistent with the Core Strategy, namely criteria (a), (f), (i).</p> <p>Each are dealt with in turn below.</p> <p>Criterion (a) seeks to restrict the density of new development. Core Strategy Policy SS2 sets a County target net density of between 30 – 50 dph, although it may be less in sensitive areas. There is no justification offered as to why 25dph is considered a maximum density; indeed, national planning policy guidance seeks to remove maximum density requirements to ensure the most efficient and effective use of land can be achieved. The first part of the criterion requires new</p>	<p>The Parish Council have chosen not to allocate rural exception sites through the NDP. Should a rural exception site come forward during the plan period this will be assessed against the relevant Herefordshire Core Strategy policies (presently H2).</p> <p>The Parish Council consider the criteria within (a), (f) and (i) below.</p> <p>(a) The density figure is included as a maximum. It is clear from Ordnance Survey maps that densities in the two settlements (Burghill and Tillington) fall far short of 25 dwellings per hectare, and future development in context with the surrounding area should reflect this.</p>	<p>No change.</p> <p>No change.</p>

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					<p>development to be in keeping with the surrounding area and this is considered to provide sufficient protection against overdevelopment. Therefore, it is recommended that criterion is reworded to remove the 25dph restriction.</p> <p>Criterion (f) is not consistent with the Core Strategy. Core Strategy Policy H1 Affordable Housing Thresholds and Targets seeks affordable housing provision on sites of more than 10 dwellings which have a maximum combined gross floorspace of more than 1000m2. On qualifying sites in the Hereford, Hereford Northern and Southern Hinterlands, and Kington and West Herefordshire housing value areas, an indicative target of 35% affordable housing provision is sought unless it can be demonstrated that this is not viable. Criterion (f) should be amended to reflect this guidance.</p> <p>The second part of this Criterion requires 'at least 15% of single storey dwellings'. This is not justified and is considered to be too prescriptive. It is recommended that this requirement is removed on the basis the remaining text seeks 'a mix of dwelling, tenures, types and sizes'.</p>	<p>(f) The Parish Council consider this criterion to be fully in accordance with Herefordshire Core Strategy policies.</p> <p>The questionnaire responses indicate that 55% of respondents suggested that small dwellings for older/retired people are required in the Parish. The Burghill NDP reflects the wishes of the community. (Graph included in paragraph 3.9 of the Burghill NDP)</p>	<p>No change.</p> <p>No change.</p>

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					Criterion (i) sets a minimum space standard. This is not acceptable and not in accordance with planning policy and other national guidance. National space standards exist with regard to minimum floorspace requirements for residential dwellings. There is no requirement to conform but Local Authorities can adopt national spaces standards; they may not set their own thresholds. On that basis it is recommended that criterion (i) is removed.	The Parish Council consider the inclusion of a minimum floor space for dwellings a necessity to ensure the dwellings that are constructed in the Parish are fit for purpose.	No change.
42.6			B4		Policy B4 Rural Enterprise and Farm Diversification is too prescriptive and not consistent with the Core Strategy. Furthermore, it includes a section that relates to the conversion of traditional agricultural buildings. This should be for a separate policy taking into consideration permitted development rights. Policy B4 should be re-written to reflect the spirit and purpose of Policy RA6. It is important the policy encourages farm diversification and types of development that will contribute to the vitality and viability of rural economies.	The Parish Council consider this policy is fit for purpose. Prior approvals for permitted development are not assessed against policy.	No change

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42.7					<p>Policy B10 Protection of Local Green Space claims to designate 8 Local Green Spaces (LGS) in accordance with paragraphs 76 and 77 of the National Planning Policy Framework (NPPF).</p> <p>In addition, the national Planning Practice Guidance (PPG) is clear that LGS designations should not be used in a way that undermines the identification of development land in suitable locations (Paragraph 007, ref. ID: 37-007-20140306)</p> <p>Policy B10 seeks to both protect and allocate land. It is clear from the above policy guidance that LGS designations should seek protection only. Of particular concern is the inclusion LGS 4 'The green areas at Leasown and Bakers Furlong' and LGS 8 'Possible graveyard extension St. Mary's Church'.</p> <p>Map 6 contained within the BNDP is poor quality but it appears that LGS 4 includes public open space between Bakers Furlong and Leasown housing estates, as per the UDP Proposals Map Insert 7 (Burghill). In addition, it is proposed to include privately owned land, estate roads and turning areas, boundary treatments, ditches and footpaths. It is not clear why this land has been included and</p>	<p>Comments noted.</p> <p>Better quality maps will be produced for the submission plan. The Local Green Space has been extended beyond that identified in the Herefordshire UDP as Open Areas and Green Space to reflect what is actually evident on site.</p>	<p>No change.</p> <p>Maps to be produced on a smaller scale OS base to ensure clarity.</p>

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					<p>it would not meet the tests of the NPPF set out above. Accordingly, it is recommended that the LGS 4 be amended to reflect the area identified in UDP Proposals Map which includes accessible and useable public open space within a residential area.</p> <p>The Policy proposed that LGS 8 is a possible extension to the existing church graveyard, which is not the purpose of LGS designation. For clarification, this land cannot be considered as LGS as it is land owned and farmed by Farmcare. It is not and never has been publicly accessible. Therefore, it cannot be considered 'demonstrably special to the local community' or hold 'particular local significance' (NPPF, para. 77). Furthermore, this land was submitted as part of the 'call for sites' exercise (Site reference 34) previously referenced, for consideration for residential uses and an extension to the graveyard. It is recommended that this site be removed as a LGS designation.</p>	<p>The ownership of land does not preclude its designation as a Local Green Space.</p> <p>LGS 8 was put forward by the village as a site for a possible extension to the graveyard.</p>	No change.
42.8					<p>These representations are submitted by Savills on behalf of Farmcare Ltd which is a major land owner within Burghill Parish.</p> <p>It has been demonstrated that the</p>	Comments noted	No change

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					<p>draft BNDP fails to meet three of the 'Basic Conditions' required by TCPA 1990.</p> <p>In particular, our assessment demonstrates that the settlement boundaries, as proposed, are inflexible and would not facilitate an appropriate level of proportional growth in Tillington and Burghill. In addition, the SAR prepared by Kirkwells has been analysed and it is our view that the report currently does not evidence a robust assessment of the submitted sites and the current scores cannot be relied upon. Therefore, we request that new, clear assessment criteria are established and the exercise is repeated. Overall, the BNDP in its current form fails to contribute towards the achievement of sustainable development.</p> <p>We welcome the opportunity to meet with the Parish Council to discuss the points made in this representation, prior to submitting the plan to Herefordshire Council.</p>		
43	10	2.1.3	3.13	Comment	<p>Tillington Common has been described as 2.13 The dwellings of Tillington Common form no consolidated group. The housing is mainly ribbon in layout and is interspersed with rural gaps and the open land of the designated</p>	<p>It is correct that there is a building group within the Tillington Common area.</p> <p>Amend paragraph 2.13.</p>	<p>Amend paragraph 2.13 1st sentence to read as follows: "The dwellings of Tillington Common form a small group".</p>

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					<p>Tillington Common. I would like to add that there is a definite consolidation of houses (shown in the photographs on pages 10 and 15 of the NDP) therefore this is not a viable reason for the area not to be considered for a settlement boundary.</p> <p>Also the questionnaires completed for the NDP state that 3.13 The majority of households (82%) think Burghill village should continue to have a settlement boundary. The majority of households (78%) think a settlement boundary for Tillington should be defined. The majority of households (71%) think a settlement boundary for Tillington Common should also be defined. This correlation allowed the NDP to conclude that settlement boundaries would be completed for Burghill and Tillington BUT omitted the findings for Tillington Common, WHY were the 'Commoners' views not treated as that of Burghill and Tillington.</p>	<p>At the time of the Examination in Public of the Herefordshire Core Strategy it was the view of Burghill Parish Council that Tillington and Tillington Common should both be classified as open countryside. However, the adopted version of the Herefordshire Core Strategy includes both Tillington and Burghill in Policy RA1 as housing growth areas. It follows that the designation of a settlement boundary for each of these areas would be appropriate.</p> <p>Tillington Common is not included in Policy RA1 (Tables 4.14 and 4.15) and as such remains open countryside with no defined identifiers as a village in planning terms. Moreover, as it is excluded from Policy RA1, it is considered to be an unsustainable location for new development due to lack of services and</p>	<p>No change.</p>

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
						infrastructure. Therefore, development proposals for Tillington Common and the wider parish are governed by the Core Strategy planning policy constraints for development in the countryside, outside of settlement boundaries, as set out in Herefordshire Core Strategy Policy RA3. For the above reasons it is considered that the definition of a settlement boundary for the Tillington Common area would be neither necessary nor appropriate.	
44	All			Object	See table below	See table below	No change
45	All			Object	See table below	See table below	No change
46	All			Object	See table below	See table below	No change
47.1 -47.	All			Object	See table below	See table below	No change
48	All			Object	See table below	See table below	No change
49	All			Object	See table below	See table below	No change

Ref No	Comments	PC Comments	Amendments to NDP
44	I am objecting to the imposition of the Burghill Draft Plan where there has been inadequate consultation and NONE WITH THE COMMUNITY since November 2014 since when this plan has been created.	The Parish Council have carried out consultation in accordance with the Neighbourhood Planning Regulations. This has included a questionnaire and Options Days in October 2014. The Options Days were advertised on the Parish website, community magazine, posters and on a flyer delivered to every household. Following the Option Days consultations, the Steering Group	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>In particular, there is considerable bias with Tillington unfairly and disproportionately being targeted with development.</p> <ol style="list-style-type: none"> <li data-bbox="264 592 992 715">1. Site 19 is GREENFIELD and not as having being described as brownfield which has unfairly given it a status and has influenced people to vote for it at the Options Days. <li data-bbox="264 820 969 975">2. A settlement boundary has been drawn around Tillington without any consultation with the community at large or directly with the residents that are having this imposed on them. WE don't want it! <li data-bbox="264 1114 1014 1203">3. The scale of development at Tillington amounts to a housing estate and is not in keeping with the character and appearance of this area. 	<p>concentrated their efforts on producing a draft plan that took into account the residents views wherever possible.</p> <p>The current NDP is a draft document on which comments are invited from the community.</p> <p>Site 19 is identified as Greenfield in the site assessments report. If this comment is referring to Site 10, part of the land to the rear of the Business Park within Site 10 has been previously used as part of the Business Park and is considered as Previously Developed Land.</p> <p>The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development. Based on the views from the Questionnaire and responses from residents at the Options Days, this draft NDP proposes a settlement boundary for Tillington in order to retain some control over future development, on which comments are invited from the community.</p> <p>The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development. All potential development sites were displayed at the Options Days in Autumn 2014. Visitors were invited to comment. The comments were taken into account by the Parish Council when assessing the sites and allocating for development.</p>	

Ref No	Comments	PC Comments	Amendments to NDP
	<p>4. The size of the proposed development is far in excess of the 1-7 dwellings per site that the majority of the community preferred.</p> <p>5. The area at Tillington where this massive development is proposed is one of the least populated areas in the parish so this housing density is completely disproportionate.</p> <p>6. Tillington has no infrastructure so these sites are unsustainable.</p> <p>7. The massive development at Tillington threatens the water quality of the River Lugg because there is no infrastructure.</p> <p>8. Site 10 is on an elevated position and will have a terrible detrimental effect with flooding all the way down to Crowmore Lane, to The Bell and at the rear at Domino Corner. Not taking these material planning considerations into account when selecting sites smacks of bias when the main growth village of Burghill has been protected and yet has all the infrastructure available. B) Because of the elevation the impact of the housing towering above will also have a detrimental visual impact on the neighbouring area.</p> <p>9. As residents we do not want mains sewerage brought to facilitate this development so some people will line their pockets which will, along with</p>	<p>Whilst the questionnaire returns favoured sites of 4-7 dwellings (40%) more than 8-10 dwellings (33%), the Herefordshire Core Strategy proposes development at an indicative rate of 30 dwellings per hectare. The Burghill NDP is required to be in general conformity with the Herefordshire Core Strategy and cannot be overly restrictive on future growth.</p> <p>See response to point 3 above</p> <p>Proposed housing sites put forward were assessed through the Site Assessment process. The most favourable were brought forward into the NDP as housing allocations.</p> <p>The plan area falls within the sub catchment of the River Wye (including Lugg) Special Area of Conservation (SAC). This is protected by Herefordshire Core Strategy Policies SS6 and LD2</p> <p>A strategy to alleviate any flooding/surface water drainage and foul drainage will have to be submitted with any planning application for the site. This could result in environmental benefits to the existing residents.</p>	

Ref No	Comments	PC Comments	Amendments to NDP
	<p>the settlement boundary, only encourage more development which the residents of this area do not want and have who have not been consulted. And no doubt, judging by the bias already shown, Tillington will then continue to be the dumping ground for Burghill's housing which let me remind you is the main growth village – the only one.</p> <p>10. This plan appears to have been drawn up to ensure all development is steered clear of Burghill which is appalling considering the viable sites and natural extensions surrounding Burghill that were put forward and completely ignored by the Steering Group...but in this case maybe you should rename yourselves the "Steering away Group". It is no surprise there is no one representing Tillington on the Steering Group.</p> <p>11. The proposed development is completely DISPROPORTIONATE and the residents HAVE NOT BEEN CONSULTED AT ALL.</p>	<p>The Herefordshire Core Strategy identifies both Burghill and Tillington as sustainable settlements which will be the main focus of proportionate housing development. All potential development sites were displayed at the Options days in Autumn 2014. Visitors were invited to comment. The comments were taken into account by the Parish Council when assessing the sites and allocating for development.</p> <p>See response at beginning of this section (44)</p>	
45	Comments as above and (Text removed *****)	Response as above	No change
46	Comments as above and (Text removed *****)	Response as above	No change
47.1	<p>(Text removed *****) INADEQUATE CONSULTATION TO THE COMMUNITY:</p> <p>1) ONLY 100 out of 1600 parishioners attending a public meeting in BURGHILL (not Tillington or Lower Burlton) announcing the BPC would be doing a NDP and Questionnaire.</p> <p>2) Distribution of a questionnaire the report not publicised and only available from the BPC website. A questionnaire that has been subsequently ignored.</p> <p>3) Options' Days over 2 days in November 2014 at the BURGHILL village hall with the obvious bias towards</p>	<p>The Parish Council have carried out consultation from September 2013 to present.</p> <p>An awareness raising meeting was held in March 2014 which was publicised around the Parish.</p> <p>720 questionnaires were distributed throughout the Parish with a response rate of 63%.</p> <p>The Options Days were advertised on the Parish website, community magazine, posters and on a flyer delivered to</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>Burghill residents that could easily walk to the event where parishioners could select their preferred sites and draw 2 settlement boundaries with no information regarding this ever published.</p> <p>4) THEN NOTHING FOR ONE YEAR with NO COMMUNITY CONSULTATION OR ENGAGEMENT until the actual Draft Plan is published with sites having been selected, housing allocations made, and remarkably a third settlement boundary for Tillington being imposed with no consultation even though it states in Para 3.34: "The analysis of the opinions expressed regarding Settlement Boundaries was not so comprehensive and could not be used to make an informed judgement on their appropriateness." and then straight to Regulation 14. (Text removed *****)</p>	<p>every household.</p> <p>Following the Option Days consultations, the Steering Group concentrated their efforts on producing a draft plan that took into account the residents views wherever possible.</p> <p>As part of this consultation, comments have been invited from residents on the draft NDP</p>	
47.2	<p>PARA 3: NOT all of the views of parishioners have been taken into account when preparing this plan and state otherwise is a gross misrepresentation.</p> <p>PARA 5: Once again there is bias as regards the comments forms being only available at the Burghill Village Hall and Burghill Gold Club. This is totally inadequate only making easy access to forms available to residents of Burghill. Why weren't comment forms made available to Lower Burlton, Tillington and Tillington Common? (Text removed *****)</p> <p>The online comment form is overcomplicated with needless required fields: page number, paragraph number, and policy number that if not filled in does not allow any body text. I would like to think it was not done deliberately as a disincentive but because of my knowledge about this entire shoddy process I do have to question why a simple comments form could not have been provided. (Text removed *****)</p>	<p>The Paragraph states that the views of parishioners have been taken into account which is a statement of fact.</p> <p>Burghill is most central within the Parish with more facilities for forms to be available.</p> <p>The online form enabled the relevant fields to be completed as required by the process.</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
47.3	<p>Page Number 8 Paragraph Number 2.5 STATEMENT: "The village of Burghill is the main component of the developed area for housing within the parish..."</p> <p>Then why has this been completely ignored with so little housing going to Burghill that is proportionate and a disproportionate amount of housing been allocated to Tillington? (Text removed *****)</p>	<p>This is a statement of the existing character of the Parish.</p> <p>See comment to 44 above</p>	No change
47.4	<p>Page Number 10 Paragraph Number 2.12 STATEMENT: "...at Tillington there is a fairly compact housing group clustered near the highway cross at Whitmore, near the Bird Pool..." (Text removed *****)</p>	See comments to 44 above	No change
47.5	<p>Page Number 10 Paragraph Number 2.13 STATEMENT: "The dwellings of Tillington Common form no consolidated group." (Text removed *****)</p>	It is correct that there is a building group within the Tillington Common area. However, there are also several groups and single dwellings spread along the main route around the common. It is for this reason that the terminology at Para 2.13 is used	No change
47.6	<p>Page Number 12 Paragraph Number 2.21 STATEMENT: "To the rear of the buildings there is land which is used in conjunction with the business zone for open commercial storage." (Text removed *****) The land behind the commercial units is GREENFIELD so it cannot be being used as open commercial storage.</p> <p>STATEMENT PARAGRAPH 6.1.24: "Site 10 – Tillington Business Park – Brownfield." (Text removed *****)</p>	Part of the land to the rear of the Business Park within Site 10 has been previously used as part of the Business Park and is considered as Previously Developed Land.	No change.

Ref No	Comments	PC Comments	Amendments to NDP
47.7	<p>Page Number 15 Paragraph Number 2.34 STATEMENT: "However, these land designations are not regulatory, so they do not impose an embargo on development. With the right type of mitigation, substitute planting, land management or species protection to ensure no net loss of biodiversity within the county, development could still be permitted."</p> <p>(Text removed *****) These sites and their indigenous wildlife should be protected at all costs! (Text removed *****)</p>	<p>Whilst Habitats of Principal Importance are not a statutory designation, they are a material consideration in the determination of any future planning application.</p> <p>The effect of proposed development on wildlife will be assessed at Planning Application stage through supporting documentation submitted.</p>	No change
47.8	<p>Page Number 16 Paragraph Number 3.7 STATEMENT: When asked what they viewed as an acceptable increase in the parish 79% of households gave one of the first three answers, namely 1%-5%, 5%-10% or 10%-15%. The most common answer was 5%-10%. THE VAST MAJORITY 64% wanted less than 10% growth – THEY WANTED LESS THAN 70 HOUSES. Combine that with below 15% growth it becomes 79%. Both are enormous percentages. (Text removed *****)</p>	<p>The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development, with a figure of 18% growth proposed for the Hereford Housing Market Area (Policy RA1).</p> <p>For the Burghill NDP to progress, it is required to be in "general conformity" with the Herefordshire Core Strategy</p>	No change
47.9	<p>Page Number 19 Paragraph Number 3.12 STATEMENT: The community considered that 4-7 dwellings per site (40% of households), was an ideal site, with 8-10 dwellings per site having a response rate of 33%. Text removed *****) OVERALL MAJORITY WANTED SITES CONTAINING 1-7 DWELLINGS. (Text removed *****)</p>	<p>Whilst the questionnaire returns favoured sites of 1-3 (13%) 4-7 dwellings (40%) more than 8-10 dwellings (33%), the Herefordshire Core Strategy proposes development at an indicative rate of 30 dwellings per hectare ensuring the sustainable use of land. The NDP has to be in "general conformity" with the Herefordshire Core Strategy in order to progress further and become part of the Development Plan for the area.</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
47.10	Page Number 22 Paragraph Number 3.19/20 (Text removed *****)	Burghill is most central within the Parish with more facilities for available for the NDP to be available. Copies were available on the Burghill website the entire duration of the consultation period.	No change
47.11	Page Number 24 Paragraph Number 3.29 (Text removed *****)	No comment	No change
47.12	Page Number 25 Paragraph Number 3.33 STATEMENT: "In addition, opinions were sought on the settlement boundaries, whether these should be amended and if so which areas should or should not be included." (Text removed *****)	The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development. Based on the views from the Questionnaire and responses from residents at the Options Days, this draft NDP proposes a settlement boundary for Tillington in order to retain some control over future development, on which comments are invited from the community.	No change
47.13	Page Number 25 Paragraph Number 3.34 STATEMENT: "Some 5161 pieces of information were analysed and recorded including over a 1000 comments indicating valid concerns or alternatively support for individual sites." (Text removed *****) STATEMENT: "The analysis of the opinions expressed regarding Settlement Boundaries was not so comprehensive and could not be used to make an informed judgement on their appropriateness." (Text removed *****)	The Options Days results were analysed by the Steering Group and Parish Council and the Options Days reports were used to inform the development of the Burghill NDP	No change
47.14	Page Number 29 Paragraph Number 5.5 STATEMENT: "The policies in the Burghill Neighbourhood Development Plan have been developed to take account of the key issues in Burghill Parish, and to achieve the aim and objectives in	The Questionnaire results were analysed by an independent organisation, Gloucestershire Rural Community Council (GRCC), and a report was presented to Burghill Parish Council. The results of the Option Days feedback were formulated	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>Section 4."</p> <p>Developed by whom? As none of the information from the questionnaire has been made available to the community, nor has the community been consulted on that information, it is logical to assume that these policies and objectives are solely the construct of the Steering Group so therefore cannot represent the views of the community.</p>	<p>into reports for each area.</p> <p>The Burghill NDP was formulated around the results of the community consultations and the requirement to be in general conformity with the Herefordshire Core Strategy.</p>	
47.15	<p>Page Number 33 Paragraph Number 6.1.16 (Text removed *****) Text relates to Core Strategy Main modifications</p>	<p>The Herefordshire Core Strategy is now the adopted policy for the County. Whilst the 18% growth is an indicative figure across the Hereford HMA, a lower figure is only likely to be acceptable where there are significant constraints within a particular settlement and this can be evidenced.</p> <p>There are no specific issues identifiable with Burghill or Tillington</p>	No change
47.16	<p>Page Number 33 Paragraph Number 6.1.17 STATEMENT: "Figure 4.14 of the Core Strategy continues to identify both Burghill and Tillington as growth areas. The PC has previously agreed that growth should be confined to Tillington and not Tillington Common which is perceived to be an unsustainable countryside location for new development, as confirmed by previous planning decisions." (Text removed *****)</p>	<p>The comments submitted relate to the Herefordshire Core Strategy examination process.</p>	No change
47.17	<p>Page Number 33 Paragraph Number 6.1.17 Repeat of above (Text removed *****)</p>	<p>As above</p>	No change
47.18	<p>Page Number 34 Paragraph Number 6.1.19 STATEMENT: In the parish there is the potential for about 20 dwelling sites to come forward from sites known as</p>	<p>The Parish Council consider that as the windfall sites are within open countryside, they are not appropriate for allocation in the Burghill NDP.</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>windfalls. These are sites which might not have been previously known, sites for single dwellings, changes in existing planning permissions or conversions to existing buildings. Some of these sites are already under discussion or planning applications have been made.</p> <p>The definition of Windfalls according to the Core Strategy (and National Planning Policy Framework) Glossary is: "Sites which have not been specifically identified as available in the Local Plan process".</p> <p>Out of the 20 "Windfalls" in the NDP 14 are already known about and do not fall into the definition according to the Core Strategy. THEY ARE NOT WINDFALLS. This is ludicrous! Those 14 should be identified separately as allocations and then 20 true windfalls included in the provision. The total for new housing is then reduced substantially.</p> <p>NOW CONSIDER THIS AS AN ALTERNATIVE:</p> <p>Conversions/houses that have been submitted to the Neighbourhood Plan process that have been completely ignored by the BPC that could be allocated because they are clearly not windfalls as they are known about:</p> <ul style="list-style-type: none"> • 6 conversions at Hospital Farm Buildings • 2 houses on land at rear of the Villa Burghill • 1 conversion at Court Farm Hop Kilns • 1 equestrian business house at Tillington • 3 conversions at Field Farm on Credehill Rd, Tillington • 1 house at Rose Farm, Tillington Common • 1 house adj Elm Cottage Tillington Common • 1 house adj Old Chapel Tillington Common • Piggery redevelopment for 5 houses refused but the 	<p>However, should they come forward as planning applications, they will be assessed against the Herefordshire Core Strategy Policies for development in open countryside.</p>	

Ref No	Comments	PC Comments	Amendments to NDP
	<p>NP could have included say 3 houses (10 were submitted to NP) and allocated them in it. That is 19 in total! None of which would have an adverse effect on the parish. Then also there are the outstanding applications:</p> <ul style="list-style-type: none"> • Still to be determined – 20 houses near St Mary’s; • Still to be determined – 50 houses at junction Tillington Road/Roman Road in Lower Burlton; • Still to be determined – 2 conversions at Fruit Farm Cold Store • Still to be determined – 1 conversion at Fruit Farm Office • (The 3 conversions should happen and the NP ought to support and include them.) <p>Less commitments completions and permissions 2011-2014 = 19 Less permissions April 2014 to date not included in the above: 1 house after Appeal at 24 Hospital Houses, St Mary’s; 24 at Pyefinch, 2 conversions at Parks Farm over and above the 2011-2014 permissions, 1 conversion at the Gospel Hall, 3 conversions at Tillington Fruit Farm = 31 Then an allowance for future windfalls at 16% which is a dreadfully under-estimated figure. But using is as a minimum as a basis for future windfalls = 20 Therefore, that makes a running total 19 + 3 + 19 + 31 + 20 = 106 123 – 92 = 31 new builds to find. That is how easy it is to allocate housing when there isn’t an agenda to develop Tillington!!!</p> <p>31 new dwellings could easily be proportionately distributed throughout the parish. (Text removed *****)</p>		

Ref No	Comments	PC Comments	Amendments to NDP
47.19	Page Number 34 Paragraph Number 6.1.23 STATEMENT: "Additional information is inserted into the tables from the Options Days scores where the sum of the %'s both in favour and neutral is shown." (Text removed *****)	No comment	No change
47.20	Page Number 35 Paragraph Number 6.1.24 STATEMENT: The result of this process is that 7 undeveloped sites and one previously developed site came out as the most favoured. (Text removed *****)	See comments at 44	No change
47.21	Page Number 35 Paragraph Number 6.1.26 STATEMENT: "The sites that are shown within the possible settlement boundaries at Burghill, Tillington and Lower Burlton have the potential to meet the housing requirement imposed on the Parish by the Core Strategy and demonstrate alignment with its policies. Furthermore, they have the potential to achieve this growth at a modest housing density, in line with the aspirations of parishioners and which would also reflect the character and appearance of the parish." Nonsense! The BPC has completely ignored "the aspirations of parishioners" of who over half preferred 1-7 houses where the BPC has imposed 10-12 houses without any consultation. (Text removed *****)	See response to 47.9 above	No change

Ref No	Comments	PC Comments	Amendments to NDP
47.22	Page Number 35 Paragraph Number 6.1.27 STATEMENT: "The BPC notes the returns from the questionnaire which favoured the designation of a settlement boundary for Tillington Common, however, it was considered that the definition of a settlement boundary for the Tillington Common Area would be inappropriate. The housing layout in the Tillington Common area has a limited identifiable core." (Text removed *****)	The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development. Tillington Common is not included in either of the Tables in the Core Strategy (4.14 and 4.15) and is therefore designated as open countryside.	No change
47.23	Page Number 35 Paragraph Number 6.1.28 STATEMENT: "The housing here is well spread out with significant gaps between either individual groups of dwellings or single dwellings. The Parish Council considers the Tillington Common area is a countryside location with no defined identifiers as a village in the normal sense." (Text removed *****)	The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development. Tillington Common is not included in either of the Tables in the Core Strategy (4.14 and 4.15) and is therefore designated as open countryside.	No change
47.24	Page Number 36 Paragraph Number 6.1.29 STATEMENT: "Furthermore, it is considered to be an unsustainable location for new development due to lack of services and infrastructure. Therefore, development proposals within this area should be governed by the normal core strategy planning policy constraints for development in the countryside beyond a settlement boundary, as set out in Herefordshire Core Strategy Policy RA3." YOU ARE DESCRIBING TILLINGTON AGAIN!!! (Text removed *****) Tillington is as it always has been: in the countryside and therefore "...development proposals within this area should be governed by the normal core strategy planning policy constraints for development in the countryside beyond a settlement boundary, as set out in Herefordshire Core Strategy Policy RA3." applies.	The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development. Tillington Common is not included in either of the Tables in the Core Strategy (4.14 and 4.15) and is therefore designated as open countryside.	No change

Ref No	Comments	PC Comments	Amendments to NDP
47.25	<p>Page Number 36 Paragraph Number 6.1.30 STATEMENT: "Policy B1, in addition to the site assessment process, and the allocation of sites seeks to achieve Objectives 1 and 2 identified in paragraph 6.1.1" Paragraph 6.1.1 states: "To establish criteria for new housing such as the size of developments, sustainability..." Where are the criteria? Not published? STATEMENT: "Possible housing sites at a low density as preferred by Options Day returns" (Text removed *****) Currently the housing density at Tillington is 7 dwellings per hectare and any development should align with that. (Text removed *****)</p> <p>All the sites at Tillington have been "preferred" without including these important material planning considerations. It is ludicrous.</p> <p>1. None of the Tillington sites have access or inadequate access with visibility issues and safety issues that the planning office confirmed when the site owner's application for an access into site 10 was rejected on the advice the Highway's Department that visibility was totally inadequate and could not be met.</p> <p>2. The higher elevation will cause surface flooding and environmental pollution of the River Lugg Catchment.</p> <p>3. No mains sewerage or mains drainage. 3 million litres of waste water will have a catastrophic effect on current residents where flooding of septic tanks is already a problem and flooding of properties and roads.</p> <p>4. No footpaths. (Text removed *****)</p> <p>And besides this plan is already redundant. With the 50</p>	<p>The criteria are within Policy B1 and other relevant policies within the Burghill NDP</p> <p>The Herefordshire Core Strategy proposes development at an indicative rate of 30 dwellings per hectare to ensure the sustainable use of land. The Burghill NDP proposes within B1 (a) that development should maintain and appropriate density in context with the immediate surrounding area. To specify a specific density for a development can be seen to prevent sustainable development and would therefore not be consistent with National Policy.</p> <p>The sites were scored in accordance with a specific methodology and scoring system identified in the Site Assessment report. The issues identified will be assessed during the planning application process.</p> <p>Whilst a planning application has been submitted, the Parish</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
	houses under Planning Application on the corner of Tillington Road and Roman Road; 20 at St Mary's Park, 7 at Tillington Fruit Farm, those account for a considerable number of all the housing allocation. Text removed *****)	Council consider it expedient to submit the Burghill NDP with its current allocation of sites as soon as possible. Once submitted, the NDP becomes a material consideration in the determination of planning applications, enabling the Parish to have some control over future development. Tillington Fruit Farm is open countryside. Should a planning application be approved at the site, this would be a windfall site. St Marys Park was refused by Herefordshire Council and dismissed at appeal.	
47.25	Page Number 37 Paragraph Number n/a STATEMENT: Policy B1 - Scale and type of new housing in Burghill and Tillington and Lower Burlton. But for Tillington you have just ignored this policy in: (a) Maintains an appropriate density in context with the immediate surrounding area and not exceeding 25 dwellings per hectare; - IGNORED (b) Ensures appropriate and safe access; - IGNORED (c) Ensures adequate access to public transport facilities; - IGNORED (g) Reflects the scale and function of the settlement; - IGNORED Development in open countryside including conversion of rural buildings will be in accordance with the relevant Herefordshire planning policies. - IGNORED (Text removed *****)	Proposed housing sites put forward were assessed through the Site Assessment process. The most favourable were brought forward into the NDP as housing allocations. The sites were scored in accordance with a specific methodology and scoring system identified in the Site Assessment report. The issues identified will be assessed during the planning application process.	No change
47.26	Page Number 53/54/56 Paragraph Number 6.6.15 Policy Number B10 Map 6 PAGE 66 MAP 6 DESIGNATED LOCAL GREEN SPACES Paragraph 77 of the NPPF and Paragraph 6.6.15 of the Draft Plan states: "Local Green Space designation will not		No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>be appropriate for most green areas or open space. The designation should only be used...where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife."</p> <p>Paragraph 76 of the NPPF states: "identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development."</p> <p>This projects supposed green space across the eastern end of Bakers Furlong which blocks access to Site 35 (a viable sustainable development site adjacent to Burghill settlement boundary) owned by Farmcare that they submitted for possible housing. This is in contravention of Paragraph 77 of the NPPF. (Text removed *****)</p>	<p>The Local Green Space has been extended beyond that identified in the Herefordshire UDP as Open Areas and Green Space to reflect what is actually evident on site.</p> <p>Site 35 was not identified as a sustainable site to be brought forward into the Burghill NDP through the Site Assessment process.</p>	
47.27	<p>Page Number 37/40/41 Paragraph Number Policy Number B1/B3/B4 Page No: 37 Policy No: B1</p> <p>(a) The density figure in (a) is too vague and must be changed to be: "not exceeding the average housing density of the existing properties in the settlement boundaries excluding allocated sites".</p> <p>Page No: 40 Policy No: B3 All the statements contained in Policy B3/B4 are too vague and should be corrected.</p> <p>(c) Please use the Core Strategy words from Policy RA6 Rural Economy: "(c) ensure that the development is of a scale which would be commensurate with its location and setting;</p>	<p>(a) The density figure is included as a maximum. It is clear from Ordnance Survey maps that densities in the two settlements (Burghill and Tillington) fall far short of 25 dwellings per hectare, and future development in context with the surrounding area should reflect this.</p> <p>(c) The wording in the NDP reflects aim of the wording in Policy RA6 and should remain.</p>	No change.

Ref No	Comments	PC Comments	Amendments to NDP
	<p>(d) Please use the Core Strategy words from Policy RA6 Rural Economy: "(d) do not cause unacceptable adverse impacts to the amenity of nearby residents by virtue of design and mass, noise and dust, lighting and smell;"</p> <p>(f) Please use the Core Strategy words from Policy RA6 Rural Economy: "(f) do not generate traffic movements that cannot safely be accommodated within the local road network"</p> <p>Water quality is vitally important considering Burghill Parish lies within the catchments of the River Lugg and River Wye. Therefore, it is essential to add the following which is from Policy RA6 of the Core Strategy: "(g) do not undermine the achievement of water quality targets in accordance with Core Strategy Policies SD3 and SD4."</p> <p>Then (g) existing therefore becomes (h)</p> <p>Page No: 40 Policy No: B4 (b) Please replace with the words from Core Strategy RA6: "(b) (The proposed use will not) cause unacceptable adverse impacts to the amenity of nearby residents by virtue of design and mass, noise and dust, lighting and smell;"</p>	<p>(d) The wording in the NDP reflects aim of the wording in Policy RA6 and should remain.</p> <p>(f) The wording in the NDP reflects aim of the wording in Policy RA6 and should remain.</p> <p>This is covered by Herefordshire Core Strategy Policy SD3. The is no need to duplicate higher level policies within the Burghill NDP.</p> <p>(b) The wording in the NDP reflects aim of the wording in Policy RA6 and should remain.</p>	
47.28	<p>Page Number 47/48/49 Paragraph Number n/a/6.5.9/n/a Policy Number B8/n/a/B9 STATEMENT: "It does not result in backland development which has a detrimental impact on the character of the village."</p> <p>STATEMENT: "The Parish Council and the residents of the Parish consider it important to protect the character and setting of Burghill, the other housing groups within the</p>		

Ref No	Comments	PC Comments	Amendments to NDP
	<p>parish and the surrounding landscape.”</p> <p>STATEMENT: “(b) Development proposals should seek to preserve and where possible enhance the character of the village.”</p> <p>Once again the bias is demonstrated in apportioning of importance to Burghill and not Tillington or Lower Burlton. (Text removed *****)</p>	<p>Amend (b) to make village plural</p>	<p>Amend Policy B9(b) to make village plural.</p>
47.29	<p>Page Number 55 Paragraph Number 6.7.3/6.7.4</p> <p>STATEMENT: “6.7.3 Policy SD4 of the Herefordshire Core Strategy states that development should not undermine the achievement of water quality targets for rivers within the county, in particular through the treatment of wastewater.”</p> <p>STATEMENT: “6.7.4 In the first instance developments should seek to connect to the existing mains wastewater infrastructure network. Where this option would result in nutrient levels exceeding conservation objectives targets, in particular additional phosphate loading within a SAC designated river, then proposals will need to fully mitigate the adverse effects of wastewater discharges into rivers caused by the development.”</p> <p>Allocating the huge development of 24 houses at Tillington WILL “undermine the achievement of water quality targets for rivers” and WILL add “additional phosphate loading within a SAC designated river”. There is NO MAINS SEWERAGE OR MAINS DRAINAGE at Tillington so this is evitable. (Text removed *****)</p>	<p>With regard to infrastructure, new development will be expected to incorporate drainage arrangements as part of the Planning Process. See notes 5 and 7 above</p>	<p>No change</p>

Ref No	Comments	PC Comments	Amendments to NDP
47.30	<p>Page Number 60 Paragraph Number 8.2 STATEMENT: "Where the need for change is identified the Parish Council will work with Herefordshire Council to produce updates and amendments where necessary."</p> <p>AND WHAT ABOUT THE COMMUNITY DECIDING?</p> <p>(Text removed *****)</p>	<p>When the Burghill NDP reaches the end of the process it will become part of the development plan for the area for the plan period until 2031.</p> <p>When the Core Strategy is reviewed it is expected that the Burghill NDP will form part of that process.</p> <p>Currently there is no process in place for any review of an NDP without going through the whole process from the beginning</p>	No change
47.31	<p>STATEMENT: Proposed design standards derived from questionnaire responses and Steering Group members are set out below.</p> <p>LOCATION criteria:</p> <p>SO WHERE IS THE COMMUNITY INVOLVEMENT IN ESTABLISHING THESE CRITERIA?</p> <p>Text removed *****)</p> <p>INFRASTRUCTURE</p> <p>No mention of SURFACE FLOODING. Text removed *****)</p> <p>THIS IS IMPORTANT with the propensity for Tillington to flood that has NO INFRASTRUCTURE. Text removed *****) Text to be added</p> <p>"For developments in areas which do not have mains sewage or mains drainage, waste water discharges should be to a package sewage treatment works in the first instance, alternatively (and only where appropriate) to a septic tank, in both cases discharging to soakaway (not to a watercourse, due to the need to recover or maintain good river water quality). Phosphates strippers must be</p>	<p>The Design guidance was derived from the questionnaire responses and the knowledge and guidance of both the Steering Group Member and the Parish Council.</p> <p>The proposed wording promotes too much detail. These issues are adequately covered by existing Herefordshire Core Strategy policies.</p>	

Ref No	Comments	PC Comments	Amendments to NDP
	<p>fitted to all new package sewage treatment works/septic tank installations (again due to the need to recover or maintain good river water quality). Planning applications must provide independent evidence that water discharges will not cause additional surface water flooding which affects the amenity of other properties or prevents the proper function of their septic tanks; nor cause additional surface flooding on nearby highways. Developers may be required to contribute to works which prevent additional surface flooding, and in some cases where existing flooding is unacceptable, to remediate that too before their development can be allowed to proceed."</p> <p>LAYOUT AND SIZE OF DEVELOPMENT</p> <p>STATEMENT: "Housing density shall be no more than 25 dwellings per hectare including all works required for access, public utilities, infrastructure and vehicle parking"</p> <p>THIS IS THE COMMUNITY'S PLAN so why include such an absurdly high figure of "25 dwellings per hectare"? The only people that will benefit from this are developers but maybe that is the intention here.</p> <p>The current densities are for Tillington 7 dwellings per hectare and for Burghill 10.5 dwellings per hectare so why triple and almost quadruple that for Tillington? PROTECT THIS COMMUNITY!!!</p> <p>But because Pyefinch sets a precedent of 14 dwellings for hectare equivalent to a 33% increase then can gives 9 dwellings per hectare for Tillington and Tillington Common. And at Lower Burlton where the current density is 17 dwellings within the current settlement boundary which equates to 22 dwellings per hectare.</p>	<p>The Herefordshire Core Strategy proposes development at an indicative rate of 30 dwellings per hectare to ensure the sustainable use of land. The Burghill NDP proposes within B1 (a) that development should maintain and appropriate density in context with the immediate surrounding area.</p> <p>The density figure is included as a maximum. It is clear from Ordnance Survey maps that densities in the two settlements (Burghill and Tillington) fall far short of 25 dwellings per hectare, and future development in context with the surrounding area should reflect this.</p>	

Ref No	Comments	PC Comments	Amendments to NDP
	<p>Therefore, using a logical basis, consistent with maintaining the existing character of localities, the first proposed design standard in this section should be modified to read:</p> <p>“New Housing density shall be no more than 14 dwellings per hectare in Burghill; 9 dwellings per hectare in Tillington and Tillington Common; and 22 dwellings per hectare in Lower Burlton including all works required for access, public utilities, infrastructure and vehicle parking”</p> <p>THIS IS IMPORTANT!!!</p> <p>STATEMENT: “Housing groups within development projects shall not exceed 10 dwellings.”</p> <p>Why? To fit in and justify the disproportionate development allocated at Tillington? Who decided this? Oh we don’t know! The questionnaire was clear the majority preferring 1-7 dwellings per site. Therefore, this should be changed to:</p> <p>“Housing groups within development projects shall not exceed 7 dwellings.”</p> <p>STATEMENT:</p> <ul style="list-style-type: none"> • At least 35% of the dwellings shall be affordable housing and shall be dispersed throughout market housing • Not more than 2 affordable homes shall be either linked or • neighbouring dwellings (to ensure the integration of affordable and • market housing within development projects) 	<p>Whilst the questionnaire returns favoured sites of 4-7 dwellings (40%) more than 8-10 dwellings (33%), the Herefordshire Core Strategy proposes development at an indicative rate of 30 dwellings per hectare. The Burghill NDP is required to be in general conformity with the Herefordshire Core Strategy and cannot be overly restrictive on future growth.</p> <p>The percentage rate is set by the Herefordshire Core Strategy subject to viability. With regard to the further criteria this is to enable market and affordable dwellings to be interspersed on a site.</p>	

Ref No	Comments	PC Comments	Amendments to NDP
	<ul style="list-style-type: none"> • Not more than 3 dwellings shall be linked in a terraced layout • WHO DECIDED THIS? WHERE IS THE PROPER CONSULTATION? <p>SIZE OF DWELLING</p> <ul style="list-style-type: none"> • New dwellings should have a minimum internal floor area of 80 sq.m where possible. • Development sites shall comprise not more than 10% of 5 bedroom dwellings, not more than 60% of 3 or 4 bedroom dwellings and the remainder shall be 2 or 1 bedroom dwellings • At least 15% of dwellings should be single storey ground floor building <p>WHY? WHO DECIDED THIS? ARBITRARY NUMBERS THAT ARE MEANINGLESS. WHERE IS THE PROPER CONSULTATION?</p> <p>SITE SPECIFIC FEATURES</p> <p>STATEMENT: "Permitted development rights for outbuildings, extensions, additions and conservatories shall be withdrawn on sites for new housing." (Text removed *****)</p>	<p>The Parish Council consider the inclusion of a minimum floor space for dwellings a necessity to ensure the dwellings that are constructed in the Parish are fit for purpose.</p> <p>The further criteria are included to guide the size of dwelling to that which is appropriate to the Parish.</p>	
47.32	<p>Page Number 64</p> <p>MAP 4 Tillington proposed settlement boundary including Tillington Business Park</p> <p>1. THE PARISH COUNCIL HAS NOT ADEQUATELY PURSUED THE EXCLUSION OF TILLINGTON FROM THE HEREFORDSHIRE COUNCIL VILLAGE LIST.</p>	<p>Each of these issues have been addressed in responses above. (47.1-47.31)</p>	<p>No change</p>

Ref No	Comments	PC Comments	Amendments to NDP
	<p>2. AGREEING TO HAVE A STATEMENT OF COMMON GROUND INCLUDED IN THIS DRAFT PLAN TO TARGET TILLINGTON FAILS THE PEOPLE OF TILLINGTON AND HAS BEEN IMPOSED WITHOUT ANY CONSULTATION.</p> <p>3. THERE HAS BEEN NO CONSULTATION ON THIS SETTLEMENT BOUNDARY THAT THAT SOMEONE HAS WILFULLY DRAWN TO FACILITATE THE AGENDA TO DEVELOP TILLINGTON.</p> <p>4. THROUGHOUT THIS PLAN TILLINGTON BUSINESS PARK HAS BEEN THE FOCUS BY THE ALLOCATION OF A MASSIVE ESTATE THAT CENTRES ON SAID BUSINESS PARK.</p> <p>5. THE 4 ACRES OF TILLINGTON BUSINESS PARK THROUGHOUT THIS PROCESS HAS BEEN WRONGLY ATTRIBUTED AS BROWNFIELD WHEN ONLY THE SOUTHERN PART THAT INCLUDES THE COMMERCIAL UNITS COULD BE CLASSED AS THAT. IT IS DELIBERATE TO INFLUENCE PUBLIC OPINION AND GAIN A HIGHER RANKING.</p> <p>6. THERE HAS BEEN NO CONSULTATION ON HOUSING, DENSITIES, ALLOCATIONS OR NUMBERS PER SITE, EVERYTHING HAVING BEEN DECIDED BEHIND CLOSED DOORS.</p> <p>7. THERE HAS BEEN NO CONSIDERATION MADE FOR THE LACK OF INFRASTRUCTURE. (Text removed *****)</p>		
48.1	<p>Page No.: 2 The paragraph beginning 'The Draft Burghill Parish Neighbourhood Development Plan' states: 'The views of parishioners have been taken into account'. We have no way of knowing if the views of parishioners have been taken into account because parishioners have not been informed of the options days' comments or involved in discussing how to use those comments, or included in deciding how to move on from there.</p>	<p>The Parish Council have carried out consultation in accordance with the Neighbourhood Planning Regulations. This has included a questionnaire and Options Days in October 2014. The Options Days were advertised on the Parish website, community magazine, posters and on a flyer delivered to every household.</p> <p>The Questionnaire results were analysed by an independent organisation, Gloucestershire Rural Community Council</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>Parishioners do not know why each site has been chosen or ignored and neither do the site submitters. The basis upon which decisions have been made has not been shared or discussed.</p> <p>Parishioners have not been properly included in changing or making settlement boundaries (as is actually stated on Page 25 Paragraph 3.34 of Draft Neighbourhood Plan).</p> <p>It is clear that the views of parishioners cannot have been taken into account, so please insert 'NOT' between 'have' and 'been', i.e.: 'The views of parishioners have NOT been taken into account',</p>	<p>(GRCC), and a report was presented to Burghill Parish Council.</p> <p>The results of the Option Days feedback were formulated into reports for each area.</p> <p>The Burghill NDP was formulated around the results of the community consultations and the requirement to be in general conformity with the Herefordshire Core Strategy. Following the Option Days consultations, the Steering Group concentrated their efforts on producing a draft plan that took into account the residents views wherever possible.</p> <p>The current NDP is a draft document on which comments are invited from the community.</p>	
48.2	<p>Page No.: 10 Paragraph No.: 2.12</p> <p>There is NOT a 'fairly compact housing group clustered near the highway cross at Whitmore'.</p> <p>If you stand at the crossroads and look in all directions you can just make out five houses; one is Pen-y-Ploc, one belongs to Court Farm, one is Whitmore Pool Cottage and two belong to a resident. You can't see any others. In fact, there are only eighteen houses within the hurriedly drawn and not consulted upon settlement boundary in the draft neighbourhood plan, and they are 'interspersed with rural gaps and open land' (see Page 10 Paragraph 2.13)</p> <p>To be pedantic, there is no cross, Tillington Rd. is only a class 'C' road not the M6, no normal English speaking person would call it anything other than a crossroads, this is supposed to be OUR neighbourhood plan, please use plain English.</p>	<p>No comments. The description of Tillington is from a plan view rather than street view.</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
48.3	<p>Page No.: 10 Paragraph No.: 2.13 Policy No.: n/a The dwellings of Tillington Common are more numerous, more visible, and more consolidated than at Tillington. There is a large cluster of 41 houses at Tillington Common extending west and north from Yew Tree House up to Stone Cottage and into Badnage Lane as well; and a further cluster of 9 houses near and opposite Redhouse Farm.</p> <p>If you go up onto the top of the Common and look down onto the LARGE HOUSING GROUP of Tillington Common, you actually see what is a substantial village settlement below, which was the one appraised by Herefordshire Council in 2009-2013 in its Rural Background Papers to be selected as a MAIN VILLAGE.</p> <p>The fact that Tillington Common is a substantial settlement is evidenced by the fact that South Herefordshire District Council did propose a settlement boundary for this consolidated settlement of more than 40 houses (proposed SHDC proposals map attached). The description in paragraph 2.13 is contrived to defend a wrong decision to put too much new housing in Tillington near Whitmore Cross, but none in Tillington Common.</p>	<p>At the time of the Examination in Public of the Core Strategy it was the view of the Burghill Parish Council and the community in the areas concerned that Tillington and Tillington Common should both be classified as open countryside.</p> <p>However, the final version of the adopted core Strategy included both Tillington and Burghill in Policy RA1 as housing growth areas. It follows that the designation of a settlement boundary for these areas would be appropriate.</p> <p>Tillington Common was not included in Table RA1 and as such remains a countryside location with no defined identifiers as a village in the normal sense. Moreover, it is considered to be an unsustainable location for new development due to lack of services and infrastructure.</p> <p>Therefore, development proposals within this area should be governed by the normal core strategy planning policy constraints for development in the countryside beyond a settlement boundary, as set out in Herefordshire Core Strategy Policy RA3. For the above reasons it is considered that the definition of a settlement boundary for the Tillington Common Area would neither be necessary</p>	No change
48.4	<p>Page No.: 13 Paragraph No.: 2.24 Most mere mortals who speak English say 'pavement' not 'footway'. Why be confusing? It is really annoying to read POMPOUS language of which the word 'footway' is just one example. We need PLAIN ENGLISH for clarity, we do not need pomposity. Throughout the NDP delete 'footway' and replace it with 'pavement'. You might delete 'pedestrian way' as well. Similarly, delete 'highway' throughout the NDP and replace it with 'road'. The Tillington Road is not the M6! This is supposed to be a Plan for 2011-2031, not 1811-</p>	<p>The Burghill NDP is a land use plan, to be used by Herefordshire Council to determine planning applications.</p> <p>Whilst the general public call the areas 'pavements' and 'roads', the technical terms are 'footways' and 'highways'.</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>1831. Alternatively, if whoever wrote this wishes to insist on using this outdated pompous language, leave 'footway' and 'highway' as they are, but change all instances of 'car' to 'horseless carriage', and all instances of 'bus' to 'omnibus'. By the way, there are NO pavements (or footways) in Tillington.</p>		
48.5	<p>Page No.: 15 Paragraph No.: 2.34 Burghill Parish Council should be determined to protect these habitats, and in doing so to protect parishioners from overdevelopment. If there is "a presumption against development" why is our NDP even mentioning "mitigation" and "substitute planting"? We don't have to give in to the developers and their agents, and should not be suggesting that we might. Delete the last 2 sentences of Page 15, Paragraph 2.34.</p>	<p>Whilst Habitats of Principal Importance are not a statutory designation, they are a material consideration in the determination of any future planning application.</p>	No change
48.6	<p>Page No.: 17 Paragraph No.: 3.7 This is BIASED and ignores the majority. It should say: "When asked what they viewed as an acceptable increase in the Parish a majority (64%) gave one of the first two answers, wanting a total growth in housing numbers of 10% or below."</p>	<p>Whilst the questionnaire results identified that the majority of respondents wanted housing growth of 10%, the Herefordshire Core Strategy identifies Burghill and Tillington as sustainable settlements which will be the main focus of proportionate housing development, with a figure of 18% growth proposed for the Hereford Housing Market Area (Policy RA1).</p> <p>For the Burghill NDP to progress, it is required to be in "general conformity" with the Herefordshire Core Strategy.</p>	
48.7	<p>Page No.: 25 Paragraph No.: 3.33 "In addition, opinions were sought on the settlement boundaries, whether these should be amended and if so which areas should or should not be included." AT NO TIME, INCLUDING AT THE OPTIONS DAYS, HAVE PARISHIONERS' OPINIONS BEEN SOUGHT REGARDING</p>	<p>The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development. Tillington Common is not included in either of the Tables in the Core Strategy (4.14 and 4.15) and is therefore designated as open countryside.</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>SETTLEMENT BOUNDARIES FOR TILLINGTON AND Tillington COMMON. THERE HAS BEEN NO CONSULTATION. Delete "opinions were sought" and replace with "opinions were NOT sought". There should be discussion groups and open and transparent meetings of the community, for parishioners to understand the significance of settlement boundaries, and full discussion of where they should or should not go. The settlement boundary for Tillington has been imposed with no consultation, and Tillington Common has been disregarded despite it being quite obviously a sizeable, larger, more established settlement than Tillington.</p>	<p>The proposed settlement boundary for Tillington is the existing built form and sites allocated in this Draft NDP.</p> <p>This draft NDP proposes a settlement boundary for Tillington in order to retain some control over future development.</p>	
48.8	<p>Page No.: 25 Paragraph No.: 3.34 Parishioners do not know if their opinions have informed the development of the NDP because the analysis of the Options Days comments has not been made public. We do not know how many or few people supported or objected to sites, or what comments were made, or where they came from. We, the parishioners, should have been informed about why sites were both chosen and rejected, and the feedback from the Options Days should have been provided for every site, including how many people supported or objected to it, a list of the comments made, and where in the Parish they came from. (Text removed *****) Why was there not more frequent and open explanation, discussion, and CONSULTATION so that parishioners could participate properly, and make informed judgements themselves? There has been over a year to have done this - stages in the process have just been skipped, and the community ignored. Consultation should have been done according to paragraph 047 of the National Planning Practice Guidance with regard to Neighbourhood Planning</p>	See response 48.1 above	No change

Ref No	Comments	PC Comments	Amendments to NDP
48.9	<p>Page No.: 26 Paragraph No.: 4.1 & Table Vision & Objectives</p> <p>In the questionnaire responses, "Over half (56%) of the 430 households who took part in the survey either disagree or strongly disagree that 18% growth in the parish would be an acceptable increase." And 64% considered that growth should be up to 10%. These were the first questions in the questionnaire and self-evidently the most important.</p> <p>The first objective should therefore be: "The appropriate level of housing growth in the parish should be up to 10%, consistent with the wishes of an overwhelming majority (64%) of households surveyed. "</p> <p>The objectives as listed do not reflect the emphases in the responses given by the community under the "Aims" section of the questionnaire. These objectives, which are a rewriting of those 'Aims' responses have not been consulted on. For example, "to support our local primary school" (number 4) may be a laudable objective, but it has been extracted from an "Aims" statement in the questionnaire "To support local facilities, such as the school, shop, pub, village hall, sport and leisure spaces, and reserve them for both present parishioners and future generations". The other facilities are still grouped together in the proposed Objectives (as objective number 5) but have been downgraded in comparison with the school. It is arguable that these other local assets are as important or more important to this community where more than half of the population (54% according to the 2011 Census) is over 45 years of age.</p> <p>Objective number 10 "To promote better internet provision" was not in the questionnaire "Aims" responses at all.</p> <p>Many of these 'objectives' relate to subjects over which neither the Parish Council nor the community has control</p>	<p>See response to 48.6 above</p> <p>The residents presented their views through the questionnaire process. The Vision and Objectives were presented to the public during the Options Days</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>(e.g. bus services, internet etc.) so it is questionable whether they should be in here, because they are not deliverable by the Parish Council.</p> <p>The actions are in many cases waffly and vague, and there are no indicators to measure achievement. Without that, it is quite possible that many of them will never happen, and therefore they are not relevant.</p> <p>These objectives have not been consulted on. This is important - it is not sufficient nor in the spirit of localism to draw them from statements in the questionnaire, and to create a list of objectives which are those of the Steering Group not the community, and change the priorities arbitrarily, because they will no longer be representative.</p>	<p>The actions are aspirational in order to achieve the Vision and Objectives of the NDP. Whilst not deliverable by the Parish Council they are a means of commencing dialogue with the service providers.</p>	
48.10	<p>Page No.: 29 Paragraph No.: 5.5</p> <p>The Policies have not been explained to, or sanctioned by, Parishioners.</p> <p>The Objectives have been plucked from various Questionnaire responses and from the 'Aims & Purposes' responses from the Questionnaire, and re-ordered with different emphases. They have NOT been consulted on with the community until this Draft Plan.</p> <p>This is FAR TOO LATE, and makes the Draft NDP appear as if it is a fait accompli of the Steering Group. There has been over a year during which time groups of interested parishioners could have discussed and formed each stated objective, its emphasis, and policy in order to create our own INCLUSIVE NDP.</p> <p>Therefore, neither the objectives nor the policies can represent the wishes of the community.</p>	<p>The Policies were drafted based on the consultation responses from the questionnaire and the Options Days in order to achieve the objectives.</p> <p>Invitations to parishioners to help with the NDP have been made at all public meetings/consultations held in the Parish with no response from the community.</p> <p>The current NDP is a draft document on which comments are invited from the community.</p> <p>See also response to 48.9</p>	No change
48.11	<p>Page No.: 30 Paragraph No.: 6.1.1</p> <p>The first objective should be:</p> <p>"To ensure that the level of housing growth in the parish for 2011-2031 should be up to 10%, consistent with the wishes of the overwhelming majority (64%) of households surveyed."</p>	See response to 48.6 above	No change

Ref No	Comments	PC Comments	Amendments to NDP
48.12	<p>Page No.: 31 Paragraph No.: 6.1.2</p> <p>The statement "villages should have a target of 18% growth" is factually incorrect because it is not qualified. Core Strategy Policy RA 1 states that:</p> <p>"The indicative housing growth targets in each of the rural HMAs will be used as a basis for the production of neighbourhood development plans in the county. Local evidence and environmental factors will determine the appropriate scale of development."</p> <p>Local evidence was researched and summarised to facilitate a more appropriate level of growth - 11%, more consistent with the 10% deemed appropriate by the Questionnaire responses, but the Parish Council has not pursued this adequately, ignoring the clearly expressed wishes of the community.</p> <p>The Parish Council should pursue a 11% housing target, as Herefordshire Council allows it to do, depending on local evidence which we already have. If it fails to do this, it is just inviting developers to build 50 more houses than are necessary, which is not what Parishioners want.</p>	<p>See response to 48.6 above</p> <p>The Herefordshire Core Strategy is now the adopted policy for the County. Whilst the 18% growth is an indicative figure across the Hereford HMA, a lower figure is only likely to be acceptable where there are significant constraints within a particular settlement and this can be evidenced.</p>	No change
48.13	<p>Page No.: 31 Paragraph No.: 6.1.5 Policy No.: n/a</p> <p>Windfalls - As drafted, the figure of 20 windfalls includes not just future windfall provisions but also known sites for 1 to 3 houses/conversions which were submitted to the Neighbourhood Plan in 2014 as available. It is wrong to include known sites as windfalls. The clues are in the adjective "known" and the noun "windfall". Known sites cannot be windfalls. The following is required:</p> <ul style="list-style-type: none"> • The known sites for 1 to 3 houses/conversions must be removed from the windfall provision, and included as allocated sites • The windfall provision will then be too low, and should be recalculated with the known sites excluded from it • The allocations for new house builds will then be too high, and should then be reduced 	<p>Potential sites of 1-3 dwellings have been included in this figure.</p> <p>Whilst sites are known about, it is uncertain as whether they will come forward. In order to allocate a site, it must be suitable, achievable and deliverable., it is therefore not appropriate to allocate the sites.</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
48.14	<p>Page No.: 31 Paragraph No.: 6.1.6</p> <p>From the Questionnaire we know that most parishioners wanted a housing increase of 10% or below over the Plan period.</p> <p>The commitment figure HAS ALREADY RISEN since this Plan was drafted (e.g. the Gospel Hall permission, and there are/will be others which will be able to be included before this Plan is finalised), and the commitment figure should be adjusted BEFORE the Plan is finalised for the referendum.</p> <p>By then, the 50 houses application at Lower Burlton may also have been approved, in which case it must be included too as a commitment, because it is within Burghill parish.</p> <p>The Parish Council is ignoring the wishes of the Parish for a lower housing increase of 10% by not including those sites in the NDP. This will reduce the number of new houses that we would still need to plan for.</p>	<p>The commitment figure is variable and the plan will be amended accordingly before submission.</p> <p>With regard to the 10% please refer to 48.6 above</p>	No change
48.15	<p>Page No.: 31 Paragraph No.: 6.1.7</p> <p>The Parish Council has failed the parishioners by not adequately challenging the gross error in the Core Strategy which named Tillington a main settlement when in fact it was TILLINGTON COMMON which had been assessed as a main settlement in the Rural Background Papers in 2009-2013.</p>	<p>The Parish Council represented these views during the Examination process for the Herefordshire Core Strategy. However, the Core Strategy has now been adopted with Burghill and Tillington being the named settlements as the focus for proportional growth.</p> <p>The NDP is not the vehicle for furthering the objections to the Core Strategy.</p>	No change
48.16	<p>Page No.: 31 Paragraph No.: 6.1.9</p> <p>The Questionnaire said: "H3 AFTER CONSULTATION HAS TAKEN PLACE WITH THE PARISH COMMUNITY should the NDP identify sites for housing within the Parish?"</p> <p>There has been NO CONSULTATION about the results of the Options Days comments, or discussion of the way forward for different parts of the Parish (e.g. in which localities development might take place in the case of Tillington/Tillington Common).</p>	See response to 48.1 above	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>We have waited over a year since the Options Days for this PROMISED consultation to take place. The Parish Council has no right to identify sites in the Neighbourhood Plan until "AFTER CONSULTATION HAS TAKEN PLACE". You are ignoring the wishes of the 84% who expressed agreement by not consulting them first.</p>		
48.17	<p>Page No.: 33 Paragraph No.: 6.1.16 In the Questionnaire, 64% of respondents said that 10% or less growth was appropriate, not 18%. Burghill Parish Council must support this majority by insisting on a lower housing target, and presenting a Plan to the examiner which represents the wishes of the majority of the Parish. Otherwise, why bother with a Questionnaire? Policy RA1 of the Core Strategy states explicitly that "Local evidence and environmental factors will determine the appropriate scale of development." The local evidence exists. 18% growth would be 123 new houses. 11% would be 75 new houses. Parishioners clearly do not support having 50 more houses than needed thrust upon them, and depend upon the Parish Council/Steering Group to represent their interests and wishes.</p>	See response to 48.6 above	No change
48.18	Comments similar to 48.3	See response to 48.3	No change
48.19	<p>Page No.: 34 Paragraph No.: 6.1.19 If sites are "already under discussion" and "planning applications have been made", then these sites cannot possibly be windfalls (the clue is in the name). The inclusion of these sites as windfalls in effect increases the number of new houses the Parish has to build, which parishioners do not want (see Questionnaire responses).</p>	Whilst sites are known about, it is uncertain as whether they will come forward. In order to allocate a site, it must be suitable, achievable and deliverable., it is therefore not appropriate to allocate the sites.	No change

Ref No	Comments	PC Comments	Amendments to NDP
48.20	<p>Page No.: 34 Paragraph No.: 6.1.21 I am aware that the Site Assessment Scoring done by the Steering Group was faulty because:</p> <ul style="list-style-type: none"> • Different numbers of Steering Group members and different members attended different assessment meetings, therefore the average from one session could not fairly be compared with the average from another session • there was no prior discussion nor agreement by the Group on how the individual assessments would be assembled therefore the rankings were naively simplistic averages. • individuals' assessments and comments were not minuted. • In addition, material planning considerations concerning the submitted sites were not adequately discussed. • The submitters of sites were not questioned about their intentions. • there is no evidence that late submission sites were assessed by the Steering Group <p>Where are the published results for all submitted sites, whether selected or rejected, with reasons?</p>	<p>The development potential of the sites has been assessed in line with present information and the normal constraints of land use planning. These constraints included: emerging planning policy; sustainability; character and appearance of any project and its impact on surroundings; access constraints; existing land uses; bio-diversity issues and protected species; land designations such as conservation areas; effect upon the living conditions of neighbours; re-use of existing buildings and the availability of sites for development. Each site was given a score of between 1 (most appropriate) and 4 (least appropriate) by members able to attend the sessions and others who provided written scores with reasons in their absence. These scores were then averaged and each site given a current rating number of between 1 and 4.</p> <p>The results will be in the submission NDP</p>	No change
48.21	<p>Page No.: 34 Paragraph No.: 6.1.23 Where are the Steering Group scores, and Options days' feedback for all submitted sites, including rejected sites and late submissions together with the assessment statements for all of them?</p> <p>There is a phrase in 6.1.23 "Additional information is inserted into the tables from the Options Days scores where the sum of the %'s both in favour and neutral is shown." And below the table in 6.1.30 it says "Options Days scores - High percentages denote more favourable sites."</p> <p>A neutral score is neither favourable nor unfavourable, and does not indicate 'more favourable". Therefore, the 'more</p>	<p>The submission NDP will include Appendix 7 which identifies all the scores for the sites. In addition, the Site Assessment report produced by independent consultants is available from the Parish Council and on the Burghill Parish Council website.</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>favourable' column is meaningless.</p> <p>In addition, the actual numbers responding (for each site) favourably/unfavourably/neutral/AND NO RESPONSE must be published because these percentages may just be for unrepresentative numbers of people. (Maybe only a handful of people expressed a view. Without full publication of the data we just do not know:)</p>		
48.22	<p>Page No.: 35 Paragraph No.: 6.1.24</p> <p>The statement that the "previously developed" site "Site 10 - Tillington Business Park - Brownfield" is brownfield is only partly true. The site proposed in the NDP is mostly on GREENFIELD land to the north of the units etc. on Tillington Business Park (which is the only part that can be described as 'brownfield'). The assertion that the whole of Site 10 as submitted in Spring 2014 is brownfield is wrong and merely an assertion. We still do not know why these 7 or 8 sites have been favoured for development over the other submitted sites. Please publish all the site assessments, including those rejected.</p>	See response to 23.1	No change
48.23	<p>Page No.: 35 Paragraph No.: 6.1.26</p> <p>The questionnaire said that 13% preferred sites of 1-3 houses per site, and 40% preferred sites of 4-7 houses per site. Therefore, over half preferred sites of up to 7 houses per site. Despite this, the allocated sites are between 10 and 12 houses per site, which only 33% preferred.</p> <p>In fact, the questionnaire did not ask about housing density AT ALL, so to claim "a modest housing density, in line with the aspirations of parishioners and which would also reflect the character and appearance of the parish" is not based on fact. YET AGAIN, THERE HAS BEEN NO CONSULTATION, this time about housing density.</p>	<p>Whilst the questionnaire returns favoured sites of 4-7 dwellings (40%) more than 8-10 dwellings (33%), the Herefordshire Core Strategy proposes development at an indicative rate of 30 dwellings per hectare.</p> <p>A criteria was included in the policies to ensure the density of development is in keeping with the surrounding area.</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
48.24	<p>Page No.: 35 Paragraph No.: 6.1.27 Policy No.: n/a</p> <p>There has been no consultation about a settlement boundary for Tillington Common (or Tillington for that matter). It is not true that "the Tillington Common area has a limited identifiable core." Tillington Common was the settlement originally identified in the Rural Background Papers as a settlement. Tillington Common did have an identifiable core when it was assessed by Herefordshire Council for the Rural Background Papers. Has that identifiable core now mysteriously disappeared? South Herefordshire District Council recognised Tillington Common as an established settlement, and drew a proposed settlement boundary around its very "identifiable", NOT "limited" core (see map attached). More houses have since been built within that proposed settlement boundary so that the "identifiable core" is today even more "identifiable" in comparison with Tillington which is a sporadic collection of hamlets. Delete "inappropriate". Replace with "appropriate". Delete "limited".</p>	See response to 48.3	No change
48.25	<p>Page No.: 35 Paragraph No.: 6.1.28</p> <p>"The housing here is well spread out with significant gaps between either individual groups of dwellings or single dwellings. The Parish Council considers the Tillington Common area is a countryside location with no defined identifiers as a village in the normal sense."</p> <p>This description defies reality. It is contrived to defend a wrong decision to put too much new housing in Tillington near Whitmore Cross, but none in Tillington Common. The "gaps" which are mentioned are within the gardens of properties, and therefore not in open countryside. And, as mentioned previously, in planning terms Tillington Common and Tillington are BOTH countryside locations because previously they have BOTH been defined under the Unitary Development Plan as under "Housing in the countryside outside settlements."</p>	See response to 48.3	No change

Ref No	Comments	PC Comments	Amendments to NDP
48.26	<p>Page No.: 36 Paragraph No.: 6.1.29 Both Tillington Common, and Tillington have NO mains sewage services, NO mains drainage services, and they are served by the SAME poor bus service. The Bell Inn is an isolated roadside rural pub which serves both settlements, and people from Burghill are rarely seen in it. The shop serves people from both Tillington and Tillington Common, few people from Burghill use it, and it is an accident of history that it just happens to be located near Whitmore Cross because of the premises there but it could disappear at any time whether or not more housing is built. Both Tillington and Tillington Common are 'unsustainable' location, and the Parish Council should be diligently insisting in the NDP that they both be regarded as RA3 countryside locations. However, if anything, Tillington Common is a larger and more defined settlement than Tillington, it is counter-intuitive that the Parish Council wishes to inflict excessive new housing on Tillington WITHOUT CONSULTATION but none at Tillington Common.</p>	See response to 48.3 and note 7.	No change
48.27	<p>Page No.: 36 Paragraph No.: 6.1.30 Comments as previous re preferred sites/site assessments, density and windfalls</p>	See responses to 48.21, 48.23 and 48.19 respectively	No change
48.28	<p>Page No.: 37 Paragraph No.: n/a Policy No.: B1 The density figure in (a) "not exceeding 25" is far too high but the density of new housing should as in B1 (g) reflect the scale and function of the settlement. Therefore, for (a) delete "and not exceeding 25 dwellings per hectare". . (Text removed *****)</p>	See response to 48.23	No change

Ref No	Comments	PC Comments	Amendments to NDP
48.29	<p>Page No.: 39 Paragraph No.: n/a Policy No.: B2 The paragraph (a) must be changed to read (a) The employment premises have been empty for 12 months or more and during that time actively and appropriately marketed without securing a viable alternative employment use The rest of the Policy does not make sense due to the use of the word "or" which makes (b) self-cancelling. Replace "or" with "AND" at end of (a).</p>	<p>First comment agreed Second comment not agreed. This is not consistent with the Herefordshire Core Strategy E2</p>	<p>Amend Policy B2 (a) to read: <i>"The employment premises have been empty for 12 months or more and during that time actively and appropriately marketed without securing a viable alternative employment use"</i></p>
48.30	<p>Page No.: 40 Paragraph No.: n/a Policy No.: B3 (c) is too vague. Please use the Core Strategy words from Policy RA6 Rural Economy: "(c) ensure that the development is of a scale which would be commensurate with its location and setting; (d) is too vague. Please use the Core Strategy words from Policy RA6 Rural Economy: "(d) do not cause unacceptable adverse impacts to the amenity of nearby residents by virtue of design and mass, noise and dust, lighting and smell;" (f) is too vague and not consistent with the Core Strategy. Please use the Core Strategy words from Policy RA6 Rural Economy: "(f) do not generate traffic movements that cannot safely be accommodated within the local road network" No regard has been taken of the possible impacts on water quality, which are incredibly important given the fact that the Parish is in the catchments of the Lugg and Wye, and particularly in the case of the Lugg the Parish has watercourses which are tributaries of the Lugg. Therefore, please ADD the following clause which is from Policy RA6</p>	<p>See response to 47.27</p>	<p>No change.</p>

Ref No	Comments	PC Comments	Amendments to NDP
	of the Core Strategy which addresses this: "(g) do not undermine the achievement of water quality targets in accordance with Core Strategy Policies S03 and S04." (g) existing therefore becomes (h)		
48.31	Page No.: 40 Paragraph No.: n/a Policy No.: B4 (b) is too vague "(b) The proposed use will not cause unacceptable disturbance to neighbours;" Please replace with the words from Core Strategy RA6: "(b) (The proposed use will not) cause unacceptable adverse impacts to the amenity of nearby residents by virtue of design and mass, noise and dust, lighting and smell;"	The wording in the NDP reflects aim of the wording in Policy RA6 and should remain.	No change.
48.32	Page No.: 44 Paragraph No.: 6.4.5 The answer to the statement "The result here may be confused by respondents not understanding the difference between public footpaths and roadside footways." is DO NOT CONFUSE PEOPLE. Use Plain English. Throughout the NDP delete 'footway' and insert 'pavement' which everybody understands.	See response to 48.4	No change
48.33	PageNo.:44 Policy No.: B7 This is supposed to be OUR NDP for a countryside location. This is not a city; we do not have "Zones". Throughout the NDP, delete "zone" and replace with "area" or "group". USE PLAIN ENGLISH.: Community Infrastructure Levy is for Capital Projects. Unfortunately, it cannot be used as in (c) "To Increase public and community transport, within, to and from the villages" unless the Parish Council is seriously considering purchasing a fleet of buses with it. This needs rewriting in consultation with groups of interested parishioners who actually use these services. In addition, it is naive to have a policy for public transport when the Parish Council has no control over the provision of public transport.	Comments noted and agreed Whilst C.I.L cannot be used for revenue projects, other funding/developer contribution may be used for this.	Amend Policy B7 to replace "zones" with "areas".

Ref No	Comments	PC Comments	Amendments to NDP
48.34	<p>Page No.: 47 & 48 Policy No.: B8</p> <p>(e) "It does not result in backland development. " This - "backland development" - is planning speak. The meaning is unclear to we ordinary inferior people. Plain English please.</p> <p>(e) "It does not result in backland development which has a detrimental impact on the character of the village". Delete "village", insert "Parish"</p> <p>Has Burghill Parish council forgotten that this is supposed to be a Plan for the whole Parish and not just for Burghill village?</p> <p>"(h) Good relationship to the street and incorporates an active frontage" We are in the countryside; we do not have streets.</p> <p>Delete "to the street". Replace with "to its surroundings". This - "active frontage" - is yet more planning speak inappropriate to this rural area.</p>	<p>Comments noted. Glossary to be included</p> <p>Agreed</p> <p>Amend to read "to its surroundings"</p>	<p>Glossary to be included.</p> <p>Amend B8(e) to delete "village" and replace with "parish".</p> <p>Amend B8(h) to delete "to the street" and replace with "to its surroundings"</p>
48.35	<p>Page No.: 50 Paragraph No.: 6.6.2</p> <p>"Burghill has a network of footpaths and open spaces, which link facilities around the village, provide means to reach open countryside and longer distance footpaths." That is very nice for Burghill. Tillington, on which you seek to foist disproportionate development, does not have these things and therefore taking these into account, is not a location for sustainable development.</p>	<p>Amend paragraph to read Burghill Parish</p>	<p>Amend Paragraph 6.6.2 to read "Burghill Parish has...."</p>
48.36	<p>Page No.: 50 Paragraph No.: 6.6.3 Policy No.: n/a</p> <p>"Burghill also has a range of community facilities that are widely used by the community, such as the school, village shop, Simpson Hall, golf club, the public house, church, "Pick your Own", Court Farm Leisure, Copse Leisure area and cricket club."</p> <p>After Burghill INSERT the word Parish</p>	<p>Amend paragraph to read Burghill Parish</p>	<p>Amend Paragraph 6.6.3 to read "Burghill Parish has...."</p>

Ref No	Comments	PC Comments	Amendments to NDP
48.37	<p>Page No.: 51 Paragraph No.: 6.6.11 This section is ambiguous. Para 6.6.9 defines "pubs and local shops" as social and community facilities. Para 6.6.11 discusses the possible unviability of local facilities. To be consistent with a clarified Policy B2 (fully reflecting Core Strategy policy E2) as discussed above, it should be time bound (vacant for 12 months or more, or whatever the community right to buy specifies) and the wording "appropriately marketed" ought to be included for the same reasons as I have discussed concerning Policy B2: i.e. "and where appropriate, it has been vacant for 12 months or more and appropriately marketed for community use without success."</p>	Amend as requested	Paragraph amended to insert the work "appropriately" .
48.38	<p>Page No.: 53 Paragraph No.: 6.6.15 Policy No.: B11 This Policy is confusing. Please rewrite/clarify. It discusses "re-use" then "change of use" and "other uses" so it is unclear whether, for example, it is enabling the village hall to be changed into a residential house or not.</p>	Not agreed. Policy is clear that any change of use should satisfy the criteria within the policy.	No change
48.39	<p>Page No.: 58 Policy No.: B14 The Policy includes a proposed Solar Farm Site at Winslow on Map 7. This really is a most inappropriate site because</p> <ul style="list-style-type: none"> • it is on top of a hill and visible for miles so it is not in conformity with criteria (c); • it is a scar on the landscape and affects the setting of the church and Conservation Area being visible from them, and also from near Concertina Cottage, so is not in conformity with criteria (d); • it would adversely affect the visual amenity of users of the Three Rivers Ride bridleway and the various footpaths to the south 	<p>The proposed site was put forward during the consultation process.</p> <p>The details will be assessed should an application for planning permission be submitted</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
48.40	Page No.: 59 Paragraph No.: 7.2 Policy No (Text removed *****)	No comments	Section will be amended to reflect current position
48.41	<p>Page No.: 60 Paragraph No.: 8.2 Policy No.: n/a</p> <p>After "Where the need for change is identified the Parish Council will work with ". INSERT "Parishioners and ""</p> <p>There has been an amazing lack of consultation with the community, and lack of engagement with the community in the development of the Draft Plan.</p> <p>So that the full sentence reads:</p> <p>"Where the need for change is identified the Parish Council will work with Parishioners and Herefordshire Council to produce updates and amendments where necessary. The Parish Council has no right unilaterally to amend the Plan, any "updates and amendments" should be consulted on.</p>	<p>When the Burghill NDP reaches the end of the process it will become part of the development plan for the area for the plan period until 2031.</p> <p>When the Core Strategy is reviewed it is expected that the Burghill NDP will form part of that process.</p>	No change
48.42	<p>Page No.: 68 & 69 Paragraph No.: n/a Policy No.: n/a</p> <p>The submitted sites map on these pages do not include the Tillington Fruit Farm sites along Crowmore Lane.</p> <p>The Minutes of the Burghill Parish Council Meeting 13 January state: "The site had been considered during the drafting of the Neighbourhood Development Plan ... "</p> <p>If it had been considered it must have been submitted, so it should be on a map. I was at the Parish Council Meeting where the agent for Farmcare stated that that there will be 7 or so conversions of Agricultural buildings to residential under Permitted Development Orders.</p> <p>THESE MUST ALL BE INCLUDED IN THE PLAN AS ALLOCATED CONVERSIONS. The consequence will of course be to reduce the number of new builds needed, which supports the wishes of the community for 10% or less growth as expressed in the Questionnaire.</p>	The sites at Tillington Fruit Farm are in open countryside and housing provision granted at those sites is "windfall" development.	No change

Ref No	Comments	PC Comments	Amendments to NDP
48.43	<p>Appendix 3 Design Guidance (</p> <p>1. "Location"</p> <p>a. I am very concerned about the two "should not materially harm" statements. One person's interpretation of "materially harm" is another person's "does not materially harm". There is the terrifying prospect of the Parish Council assessing Planning applications with their so-called 'expert' on hand, giving advice on decisions and becoming a de facto judge and jury on what is recommended, and for whom. Such recommendations then carry weight under the Neighbourhood Planning regime, and Herefordshire Council Officers will be encouraged to rubber-stamp them. The Parish Council itself needs to find a way of deciding these matters for itself, and not be so over-reliant on others.</p> <p>b. The second one, "should not. ...Materially harm the character or appearance of its surroundings" should include the following additional words "nor be over prominent on the landscape, for example by virtue of its height or elevation"</p> <p>2. "Infrastructure"</p> <p>There is something important completely omitted here. Surface Flooding is a known issue in this general area, with its heavy clay soils, the poor infiltration characteristics of these soils, and high water tables. As is well known, there are many rural sites which come forward in areas where there are neither mains sewers nor mains drainage. The impact of waste water and drainage has not been addressed for these. (Text removed *****), the following needs to be inserted: "For developments in areas which do not have mains sewage or mains drainage, waste water discharges should</p>	<p>No comment</p> <p>Herefordshire Council will remain the Local Planning Authority and will determine planning applications in accordance with the Core Strategy and the Burghill NDP when it is part of the Development Plan for the area.</p> <p>The Parish Council consider that this would make the guidance too specific.</p> <p>The Parish Council consider that this would make the guidance too specific.</p>	<p>No change.</p>

Ref No	Comments	PC Comments	Amendments to NDP
	<p>be to a package sewage treatment works in the first instance, alternatively (and only where appropriate) to a septic tank, in both cases discharging to soakaway (not to a watercourse, due to the need to recover or maintain good river water quality). Phosphates strippers must be fitted to all new package sewage treatment works/septic tank installations (again due to the need to recover or maintain good river water quality). Planning applications must provide independent evidence that water discharges will not cause additional surface water flooding which affects the amenity of other properties or prevents the proper function of their septic tanks; nor cause additional surface flooding on nearby highways.</p> <p>Developers may be required to contribute to works which prevent additional surface flooding, and in some cases where existing flooding is unacceptable, to remediate that too before their development can be allowed to proceed."</p> <p>3"Transport" This should be changed to "ALL of the dwellings on a development site shall be provided with lockable garages within the curtilage of the dwelling."</p> <p>4. "Layout and Size of Development" a. "Housing density shall be no more than 25 dwellings per hectare including all works required for access, public utilities, infrastructure and vehicle parking" That is ridiculous. This does not align with NDP Policy B1 (g). This is a rural area, not an urban one. Delete the reference to 25 dwellings per Hectare. Substitute as per B1 (g) "reflect the scale and function of the settlement" and then: "New Housing density shall be no more than 14 dwellings per hectare in Burghill; 9 dwellings per hectare in Tillington and Tillington Common; and 22 dwellings per</p>	<p>The Parish Council consider that this would make the guidance too specific.</p> <p>The density figure is included as a maximum. It is clear from Ordnance Survey maps that densities in the two settlements (Burghill and Tillington) fall far short of 25 dwellings per hectare, and future development in context with the surrounding area should reflect this.</p> <p>Too prescriptive contrary to National Policy</p>	

Ref No	Comments	PC Comments	Amendments to NDP
	<p>hectare in Lower Burlton including all works required for access, public utilities, infrastructure and vehicle parking"</p> <p>b. "Housing groups within development projects shall not exceed 10 dwellings." This is WRONG. Replace with the following, to align with the Questionnaire responses: "Housing groups within development projects shall not exceed 7 dwellings." 5. "Size of Dwelling" ~ "New dwellings should have a minimum internal floor area of 80 sq. m where possible. ~ Development sites shall comprise not more than 10% of 5 bedroom dwellings, not more than 60% of 3 or 4 bedroom dwellings and the remainder shall be 2 or 1 bedroom dwellings ~ At least 15% of dwellings should be single storey ground floor buildings" These criteria are just arbitrary. They may have been taken from the questionnaire, but it is naive to rely on that for this sort of information, because someone might have spent 20 minutes on the questionnaire then perhaps 5 seconds on this, and then it becomes "Design Guidance" if this is carried through like this. For dwelling sizes etc., There should have been full and proper consultation in the form of workshops to engage the community to establish what people really want, not the imposition of statements like this which have not been thought-through, have been inadequately consulted-on, and which will plague us forever. 6. "Site Specific Features" "Permitted development rights for outbuildings, extensions, additions and conservatories shall be withdrawn on sites for new housing"</p>	<p>Whilst the questionnaire returns favoured sites of 4-7 dwellings (40%) more than 8-10 dwellings (33%), the Herefordshire Core Strategy proposes development at an indicative rate of 30 dwellings per hectare. This would have resulted in 33 dwellings on Site 10, and 17 on Site 25.</p> <p>The Parish Council consider the inclusion of a minimum floor space for dwellings a necessity to ensure the dwellings that are constructed in the Parish are fit for purpose.</p> <p>The further criteria are included to guide the size of dwelling to that which is appropriate to the Parish.</p>	

Ref No	Comments	PC Comments	Amendments to NDP
	THIS IS TOO RESTRICTIVE. You seem to be seriously suggesting that people should not be able to put up a shed in the garden or erect a conservatory. How would you feel if you could not erect a shed in your own garden? Do you want people to store their tools and implements under bright blue tarpaulins or in bin bags in their gardens?		
48.44	<p>Map 4 Tillington proposed settlement boundary including Tillington Business Park This is disgraceful.</p> <ol style="list-style-type: none"> 1. The parish council has not properly pursued the exclusion of Tillington from the Herefordshire council village lists, it has been negligent by failing to do this 2. There has been no consultation on a settlement boundary for Tillington, someone has just drawn one to include their preference for development. 3. The Tillington Business Park has received undue prominence in This plan because someone has an agenda to develop the Greenfield land north of it come what may 4. The Tillington Business Park site was submitted including all the land north of it as 4 acres, following which that site including all the land north of it has been wrongly declared to be all brownfield, when only the most southern part might conceivably be so described 5. There has been no consultation on housing densities, nor housing numbers per site, nor the allocations 6. There has been no consideration of lack of infrastructure. 7. There has been a clinical, callous disregard for the rural nature of Tillington in this plan. (Text removed *****) 	<p>See 48.3</p> <p>See 48.7</p> <p>See 23.1</p> <p>See 23.1</p> <p>See 48.23</p> <p>See note 7</p> <p>See 48.23</p>	
48.45	<p>Map 6 Designated local green spaces page 66 The Planning Practice Guidance for the National Planning Policy Framework (NPPF) is clear - Local Green Space designation should not be used in a way that undermines the identification of development land in suitable locations.</p>	See 47.26	

Ref No	Comments	PC Comments	Amendments to NDP
	<p>In the draft Neighbourhood Plan, Policy B10 "protects" local Green Spaces. This includes "4. The green areas at Leasown and Bakers Furlong" and Map 6 on page 66 identifies this proposed green space.</p> <p>Note that at the northern tip of that supposed green space, there is a projection across the eastern end of the road Bakers Furlong where currently it terminates in a cul-de sac.</p> <p>I OBJECT to this projection because it blocks access to the Site 35 submitted by Farmcare as a possible site for housing (which is just to the east of Bakers Furlong and which would otherwise be able to use this as an access). Site 35 is an eminently sustainable development site adjacent to the main settlement of Burghill village.</p>		
48.46	<p>Page No.: 34 Paragraph No.: 6.1.23</p> <p>1. "The sites have been independently assessed by Kirkwells"</p> <p>I am not convinced of this. In order to do the job at all, they must have been briefed, they must have been given information about settlement boundaries (both existing, altered, and not yet existing) and they must have been shown where sites are. All of this information and more given to them by we know not who has informed their assessments.</p> <p>2. "The report is technical, based on professional planning opinion" (Background, page 2, paragraph 1.3 of the Kirkwells Site Assessment Report)</p> <p>a. There are mistakes in the Report about access to sites, bus services, size of site, and number of houses proposed. This means:</p> <ul style="list-style-type: none"> • Some sites have been scored wrongly, either because they are considered as not having access when they do, or having access when they have none. • Some sites have been scored wrongly (Portway and 	<p>The sites were independently assessed by Kirkwells, who visited the site and scored the sites consistently against a set of criteria.</p> <p>The most favourable sites were brought forward into the Burghill NDP.</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>Tillington Common), because they have been scored as "no bus route" when there is one (or several routes)</p> <ul style="list-style-type: none"> • Some sites have been discounted as being "isolated dwelling in the countryside" when in fact more than one house or conversion was submitted, and not in an isolated situation. • Some sites have been described as having capacity for hundreds of houses, when that was not what was submitted. For example, Farmcare/Wellcome Trust said at a well-attended Parish Council Meeting that they would do whatever the Parish wanted. The Chief Executive of Farmcare said in a letter dated 28 November 2014 to my husband (which he copied to the Parish Council Chairman) that Farmcare wished to engage with the community in supporting and producing the neighbourhood plan in consultation with the community, and acknowledge the feelings and response from the community. The Duchy of Cornwall also have said they would do whatever the Parish considers to be beneficial to it. If you put in a column, as Kirkwells have, that a site has a capacity for 96 or 123 houses, that will terrify us all, and is not what was intended by the site submitter. This is misleading. Why did Kirkwells (or indeed the Steering Group in the first instance) not talk with site submitters about their intentions in order to make better-informed site assessments? <p>The important 'Concept' consideration in Herefordshire Council's Guidance Note 21 ("Concept - is the basic idea of how the site may be developed appropriate or is there a better way of doing it?") has therefore been completely ignored, and suitable sites excluded unnecessarily.</p>		
48.47	<p>Page No.: 36 Paragraph No.: 6.1.30</p> <p>COLUMN HEADED "CONSULTANTS' RATING FIGURE" 1. Secretiveness and Opacity</p>	See comments on 47.1 about consultation	

Ref No	Comments	PC Comments	Amendments to NDP
	<p>• The consultants' Report was dated September 2015. It is quite wrong that the assessments within it, including assessments of sites not listed in the 6.1.30 Table as "preferred" sites, have not been available to parishioners until 4 weeks into the 6-week Regulation 14 consultation, because they are essential to inform the reader's understanding of the draft Plan.</p> <p>- • The Report has only been published due to requests from Savills and Herefordshire Council, not due to the need for parishioners to be informed. The Parish Council obviously does not consider that Parishioners should be informed or included.</p> <p>• Parishioners have not been notified of the publication of this Report. It has to be searched for, and found, in a section of the Burghill Parish Council's website which is not obvious. Most parishioners will not be aware that the Report exists.</p> <p>• Parishioners' views are supposed to have been "taken into account in preparing the Plan" (page 2 of the draft Neighbourhood Development Plan) and their comments are supposed to have been "considered". The making of a Neighbourhood Development Plan should be an "inclusive" and "open" process and the community "fully informed" and "actively involved" (see paragraph 047 of the National Planning Practice Guidance). Our Plan has been produced mainly in secret, and if this Report from Kirkwells has been withheld until the forced publication on February 1th 2016, one wonders how much more has been done 'on the quiet'.</p> <p>2. Kirkwells Allocation of Points</p> <p>• Points have been allocated according to whether the site is within or adjacent to a settlement boundary. In the case of Sites 10,22, and 25 the sites have been allocated points by Kirkwells as if there were an existing settlement boundary, even though the settlement boundary is</p>	<p>The Site Assessments undertaken by Kirkwells were in accordance with a specific set of criteria and draft settlement boundaries for Burghill and Tillington as they are both included in the Core Strategy as settlements to be the main focus of housing. The Lower Burlton area was</p>	

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	<p>"proposed" and parishioners HAVE NOT BEEN CONSULTED ABOUT IT (not even those resident in Tillington). Consequently, many offered-up sites were not assessed AT ALL because they were considered to be outside what is, in reality, a non-existent settlement boundary which someone has just imposed.</p> <p>~ The consultants have allocated points dependent on access. Site 10 has no access itself. The only possible access is through the "Business Park" which is locked and barred by a gate between early evening and early morning.</p> <ul style="list-style-type: none"> • The consultants have allocated points according to whether a site is greenfield or brownfield. Site 10 is greenfield. Surely no-one is suggesting building houses on the brownfield 'Business Park' (yet?) as that would involve loss of rural employment and not be in accord with Policy B2? • The consultants have allocated points according to "constraints". Now that we unimportant, irrelevant, and uninvolved parishioners have at last been allowed a glimpse of the consultants' Report we can see that "constraints" are not described or explained, so what are they? They should be specifically listed for each site. Also, it seems the same "constraints" may have been counted twice, as there are two columns, one marked "constraints" and one marked "suitability/constraints". • As the "Consultants' Rating Figure" for these supposed preferred sites are so questionable, what about the rest of the sites, which are not included here? If the points for those other sites were properly readjusted, some of them might prove to be preferred sites instead. More thoughtful and informed assessments might provide different results. • The consultants do not consider at all access to drainage or sewers in their points system. This is a serious omission 	<p>included as it is adjacent to the city boundary.</p> <p>Site 10 as submitted included the Business Park and as such had an existing access, and is also classified as part brownfield part greenfield.</p> <p>Sites that are in open countryside are not scored beyond being noted as such. This is in accordance with the guidance produced by Herefordshire Council</p> <p>Infrastructure will be provided by developers for future development.</p>	

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	<p>contrary to the Herefordshire Council Guidance Note 21. These assessments have NOT therefore been done in line with Guidance Note 21 as FALSELY CLAIMED in paragraph 6.1.23 of the draft Neighbourhood Development Plan. (Text removed *****)</p>		
49.1	Text as 48.1	Response as 48.1	No change
49.2	<p>Page 2 Para 2 Contrary to what is stated, the draft development plan has NOT been prepared in accordance with The Localism Act of 2011 NOR in accordance with Regulation 14 of Statutory Instrument No. 637 TOWN AND COUNTRY PLANNING, ENGLAND The Neighbourhood Planning (General) Regulations 2012. In addition, the Regulation 14 consultation DISCRIMINATES AGAINST THOSE WHO WORK (this Draft Plan is only available in hard copies for them on Saturdays, and few would be able to view it up to 16.00 on weekdays) and discriminates IN FAVOUR OF THOSE WHO DO NOT WORK who would be able to view it not just on Saturdays but also Monday to Fridays). Furthermore, if the latest (2011) Census data had been checked, this discrimination could have been foreseen (and/or avoided) because in the Output Areas most closely aligned with Burghill village, only 36% of 16-74 year olds work in full-time or self-employment; whereas outside Burghill village 56% of 16-74 year olds work in full-time or self-employment. Therefore, not only have people who work been discriminated against, the discrimination is more against those from outside Burghill village. This encourages a skewed response to the Regulation 14 consultation, in favour of residents from Burghill, and AGAINST RESIDENTS FROM OUTSIDE BURGHILL.</p>	<p>The Burghill NDP was available on the Parish Council website for the Regulation 14 consultation period. In addition to this there were hard copies available at specific locations which were open to the public during this period.</p> <p>See also response at 48.1</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
49.3	Page 2 Para 3. (Text removed *****)	Response as 48.1	No change
49.4	Page 2 Para 5 This states "Comments forms are available on the Burghill Parish websites". (Text removed *****) Comments as per 47.2	Response as 47.2	
49.5	Page 5 Para 1.3 The questionnaire was only distributed to the ca 680 properties in the Parish, plus approx. 40 "businesses". It was not distributed to the ca 1,600 individuals in the Parish nor the approx. 1,200 electorate so it is incorrect to say that its "aim was to reach right across Individuals", and therefore the claimed "picture (and evidence base) of the issues and concerns that should be addressed" is incomplete.	The Parish Council have carried out consultation from September 2013 to present. An awareness raising meeting was held in March 2014 which was publicised around the Parish. 720 questionnaires were distributed throughout the Parish with a response rate of 63%.	No change
49.6	Page 6 Para 1.9 (Text removed *****) The Habitats Regulations Assessment and Strategic Environmental Assessment have been completed by Herefordshire Council for release with this Regulation 14 Draft Plan.	The Draft Habitats Regulations Assessment and the Draft Environmental report were completed for the Regulation 14. However, the final Environmental Report and HRA will be completed for submission.	No change
49.7	Page 8 Para 2.5 As a matter of fact and degree, the statement "The village of Burghill is the main component of the developed area for housing within the parish" is correct. Why then, if it is the primary settlement, has it received so little housing allocated to it in this Draft Plan? It has been allocated 24 (Pyefinch as a result of planning permission granted) plus 12 (site east of Redstone) which is a total of 36 on existing dwelling numbers of about 255, so just 14% growth. On the other hand, Tillington has had a settlement boundary drawn round it by someone (without proper consultation or community engagement) where there is proposed to be 24	As 47.1 This is a statement of the existing character of the Parish. See comment to 44 above	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>new dwellings on existing dwelling numbers of 18 within that proposed settlement boundary, so 133% growth. This is totally disproportionate and unfair.</p> <p>The Parish Church of St Mary's is not just "a fine example of well-maintained traditional stone built church architecture standing in an elevated position in the southern portion of the main group and a splendid centre piece of the Conservation Area", it is a rare Grade II* Listed Building and its setting and that of the Conservation Area must be protected.</p>		
49.8	Page 10 Para 2.12 Text similar to 48.2	See response to 48.2	No change
49.9	Page 10 Para 2.13 Text same as 48.3	See response to 48.3	No change
49.10	<p>Page 13 Para 2.21</p> <p>The statement concerning Tillington Business Park "To the rear of the buildings there is land which is used in conjunction with the business zone for open commercial storage." is untrue, it cannot be true.</p> <p>This site is described as "Site 10 - Tillington Business Park — Brownfield" in paragraph</p> <p>But here, below, are 3 images from historical aerial photography courtesy of Google Earth, taken in 1999, 2006, and 2009. The proposed Site 10 is superimposed on each (outlined in red). It is obvious that from north of the point marked "X" on those images, that THE LAND IS NOT BROWNFIELD, IT IS GREENFIELD.</p> <p>In addition, the Planning Permission for the dwelling to the west of the commercial premises is for residential use, (with condition for limiting occupation only to persons employed in the associated commercial premises, or in the management of those premises, or their dependants).</p>	See response to 47.6	No change

Ref No	Comments	PC Comments	Amendments to NDP
49.11	<p>Page 15 Para 2.32</p> <p>Unfortunately, only scant regard has been given to the interface with the river catchments — perhaps the seriousness of this is not understood. The River Lugg is a tributary of the River Wye, both are within the River Wye Special Area of Conservation (SAC) up to the Lugg at Bodenham, and both are Sites of Special Scientific Interest (SSSIs). The important point to make is that the south and west of the Parish fall into the Wye catchment and the north and east of the Parish fall into the Lugg catchment. The Lugg is this year exceeding its phosphates target by three times. Housing built off-sewer in the north and east of the Parish will add to the failure to achieve favourable river quality status by the Lugg.</p> <p>This reality is being disregarded by the supposedly responsible bodies (Environment Agency, Natural England, Herefordshire Council) but I hope that in its rush to build excessive numbers of new rather than converted housing that the Burghill Parish Council might take some cognisance of this fact and act responsibly, respecting local environmental factors which the Core Strategy permits it to do (although I appreciate that the Parish Council may not have been properly informed about this). The brook at the Haven is a tributary of the Lugg (the brook is only a few hundred metres north of a proposed development site at Tillington in the Lugg catchment), so although "there are no Sites of Special Scientific Interest (SSSI) within the parish", the phosphates from proposed housing development outfalls will find their way to the nearby Lugg SSSI/Wye SAC very easily</p>	<p>Proposed housing sites put forward were assessed through the Site Assessment process. The most favourable were brought forward into the NDP as housing allocations.</p> <p>The plan area falls within the sub catchment of the River Wye (including Lugg) Special Area of Conservation (SAC). This is protected by Herefordshire Core Strategy Policies SS6 and LD2</p> <p>A strategy to alleviate any flooding/surface water drainage and foul drainage will have to be submitted with any planning application for the site. This could result in environmental benefits to the existing residents.</p>	No change
49.12	<p>Para 15 Page 2.34</p> <p>Why is it necessary to state in the Draft Plan regarding Habitats of Principal Importance: "However, these land designations are not regulatory, so they do not impose an embargo on development. With the right type of</p>	See response to 48.5	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>mitigation, substitute planting, land management or species protection to ensure no net loss of biodiversity within the county, development could still be permitted." Presumably someone is intending to manipulate a site containing a Habitat of Principal Importance into a development site in due course and is making sure that they can again bamboozle the Parish Council into including future development on sites with high wildlife potential which most people who cared would wish to be protected. The Parish Council can under the Localism Act choose to protect and conserve Biodiversity, and not enshrine its vandalism into this Draft Plan.</p>		
49.13	<p>Page 16 Para 3.3 Repeat of 49.5</p>	<p>See response to 49.5</p>	<p>No change</p>
49.14	<p>Page 16 Para 3.4 It is a false and misleading statement to claim that it was a "response rate of about 63% from residents". The questionnaire was distributed to households, not individual residents, plus business. Therefore, the response from residents cannot be determined.</p>	<p>Comment noted and agreed.</p>	<p>Para 3.4 change "residents" to "households"</p>
49.15	<p>Page 16 Para 3.6 The questionnaire returns indicated a majority disagreed that 18% growth in the parish would be an acceptable increase, and that 64% (nearly "two-thirds") of households felt that 5-10% was more appropriate. Burghill Parish Council is failing to take account of this belief by questionnaire respondents that the proposed 18% growth is excessive, by not pursuing a cogently argued case which is evidence that the growth for this Parish should be 11% not 18%. It therefore risks being negligent by not reflecting nor pursuing the overwhelming views of its parishioners.</p>	<p>See response to 48.6</p>	

Ref No	Comments	PC Comments	Amendments to NDP
49.16	<p>Page 19 Para 3.12</p> <p>This misrepresents questionnaire returns. The data has presumably deliberately been omitted. In fact, 13% preferred sites of 1-3 houses per site, and 40% preferred sites of 4-7 houses per site. Therefore, over half preferred sites of up to 7 houses per site. Despite this, the allocated sites are between 10 and 12 houses per site, which only 33% preferred. If you are going to bother to do a questionnaire, at least take account of the wishes expressed.</p>	See response to 47.9	No change
49.17	<p>Page 20 Para 3.18</p> <p>There is mention in this paragraph of the wish to protect certain buildings, places or views. As a former Steering Group member I recall attending a HER workshop on 3 July 2014 organised by Herefordshire Council where a presenter from English Heritage explained that views and buildings (e.g. characteristic black and white houses) could be defined in Neighbourhood Plans to define 'local distinctiveness' and also provide planning guidance for planning applications. I briefed the Steering Group on this. Regrettably this subject has been IGNORED in the formation of this Draft Plan which is a dreadful omission. There has been 18 months to do this. There is over-reliance on the Questionnaire. There has been plenty of time to consult with the community about what they might wish to protect. IT IS CALLED COMMUNITY CONSULTATION AND ENGAGEMENT which is noticeably absent from the evolution of the Draft Plan.</p>	The Burghill NDP does not have to cover everything. The Parish Council considers that existing legislation, national policy and local policy provides sufficient protection to heritage assets.	No change
49.18	<p>Page 22 Para 3.22</p> <p>If the roads and footways are so poor, why has this been ignored, and excessive development allocated at Tillington, where there are NO footways? One can only conclude that the 46% who thought that the footways were average or good reside in Burghill (where proposed allocated housing represents only 14% growth).</p>	See Note 7	No change

Ref No	Comments	PC Comments	Amendments to NDP
49.19	<p>Page 25 Para 3.33</p> <p>"In addition, opinions were sought on the settlement boundaries, whether these should be amended and if so which areas should or should not be included."</p> <p>In the case of Tillington and Tillington Common, this statement is a fantasy, because what the Options Day sheet actually said was:</p> <p>"You also wanted settlement boundaries drawn for Tillington and Tillington Common. We are not doing that just yet. ...</p> <p>A copy of that Options Day sheet is appended as evidence. My wife raised this as recently as 19 November 2015 with two members of the Steering Group who both initially said that settlement boundaries for Tillington and Tillington Common were consulted on at the Options Days, but then acknowledged that they had not been. So why is this misleading assertion still in this Draft Plan which was supposedly produced after that date?</p> <p>The Settlement Boundary for Tillington was drawn later WITHOUT COMMUNITY CONSULTATION, and one for Tillington Common was not drawn at all, again WITHOUT COMMUNITY CONSULTATION.</p>	See response to 48.7	No change
49.20	<p>Page 25 Para 3.34</p> <p>The 5161 pieces of information analysed and recorded from the Options Days sounds very impressive but it has never been fed back to parishioners, reflecting the patronising attitude by the Steering Group to 'consultation'. The only "feedback" from the Options Days is in this Draft Neighbourhood Plan in the table on page 36 and it consists of just SIX meaningless percentages of "Options Days scores — High percentages denote more favourable sites." (whatever that means). That is 0.1% of the 5161 pieces of information, but the other 99.9% is unfortunately omitted.</p> <p>If "The analysis of the opinions expressed regarding</p>	See response to 48.8 and 47.13	No change

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	Settlement Boundaries was not so comprehensive and could not be used to make an informed judgement on their appropriateness." then why have there not been further consultations and community engagement in the intervening 14 months to deal with this? Someone has just been drawing lines round communities without actually consulting them and engaging with them, in contravention of the National Planning Policy Guidance.		
49.21	Page 26 Para 4.1 and table. Same text as 48.9	See response to 48.9	No change
49.22	Para 29 Para 5.5 The Policies in the Burghill Neighbourhood Development Plan may "have been developed to achieve the aim and objectives in Section 4." but as commented above under Para 4.1 & Table the objectives as presented do not appear to have been consulted on (there has been no feedback from the Options Days on this, nor subsequent consultation) so therefore neither the objectives nor the policies can represent the wishes of the community.	See response to 48.10	No change
49.23	Page 31 Para 6.1.2 Same text as 48.12	See response to 48.12	No change
49.24	Page 31 Para 6.1.5 There is no explanation of how the windfall provision has been calculated. It just mentions 'a figure of 20 for windfalls over the plan period". Herefordshire Council itself acknowledges in para 4.8.9 of the Core Strategy that the bulk of development in rural areas has come from windfall development. I note that the Core Strategy forecast proportion of windfalls still to come over the plan period is actually 850 of the 5,300 total rural target, i.e. 16%. I am therefore not surprised to see from the Burghill Neighbourhood Development Plan figures that the "figure of 20 for windfalls over the plan period" is also 16% (20 +	See response to 48.19 and 47.18	No change

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	<p>123), obviously picked apparently to aligned with the Core Strategy.</p> <p>But the calculation for the Burghill Neighbourhood Development Plan has been wrongly made, and consequently (ignoring the fact that the Core Strategy assumption is dubious because it under-provides for windfalls anyway) there is an underprovision for windfalls in the Burghill Neighbourhood Development Plan.</p> <p>Refer to my comments related to para 6.1.19 on page 34 where I will explain this.</p>		
49.25	<p>Page 33 Para 6.1.16</p> <p>To the best of my knowledge, Herefordshire Council has never said that it has specifically rejected Burghill Parish Council's submission concerning 11% growth instead of 18%.</p> <p>Several pages of text extending this point in relation to Core Strategy Examination</p>	<p>The Herefordshire Core Strategy is now the adopted policy for the County. Whilst the 18% growth is an indicative figure across the Hereford HMA, a lower figure is only likely to be acceptable where there are significant constraints within a particular settlement and this can be evidenced.</p> <p>There are no specific issues identifiable with Burghill or Tillington</p>	No change
49.26	<p>Page 33 Para 6.1.17</p> <p>The statement "Figure 4.14 of the Core Strategy continues to identify both Burghill and Tillington as growth areas. The PC has previously agreed that growth should be confined to Tillington and not Tillington Common which is perceived to be an unsustainable countryside location for new development, as confirmed by previous planning decisions." Is misleading and is unfair to the residents of Tillington because:</p> <ol style="list-style-type: none"> 1. it was Tillington Common which was appraised as a settlement in the 2009/10 and the 2013 Rural Background Papers, not Tillington, and then Herefordshire Council just removed the word Common, which is why "Tillington" is in the Figure 4.14 list (previously titled 4.20), not because it has been justified to be in there, 2. Indeed, in an email to me dated September 18 	See response to 48.18 and 47.17	No change

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	<p>2014, the Chairman of the Steering Group said (and I have highlighted the relevant parts): 'As I said at the meeting, our claim against the soundness of the Draft Core Strategy is that Burghill, settlement within our NDP zone. The remainder of the- NDP zone is therefore countryside.' 3. the Parish Council put forward a representation in June 2014 (mostly mine) cogently arguing that both Tillington and Tillington Common should be removed from the 'main growth' list, but then did not pursue it at the time of the Main Modifications. 4. In February 2015 the Parish Council put forward a 'Statement of Common Ground' to Herefordshire Council (not having consulted with residents of Tillington or Tillington Common) saying that: "If the Inspector is not minded to accept the representations made by Burghill PC on this matter then the name "Tillington" should be defined by the addition of the words in brackets of: (Not Tillington Common). The reason for this is that HC planning application decisions and Inspector decisions have always considered Tillington Common to be a countryside location.'</p> <p>Several pages of text re-iterating these points</p>		
49.27	<p>Page 34 Para 6.1.19 The definition of Windfalls according to the Core Strategy (and National Planning Policy Framework) Glossary is: 'Sites which have not been specifically identified as available in the Local Plan process' However, this Draft Plan has counted sites which were submitted to the Neighbourhood Plan process, but not allocated in this Draft Plan, as "windfalls". This is WRONG, because they are known about, owners have declared that they are available, so they are NOT windfalls. There were 10 dwellings included in an earlier leaked Draft</p>	See response to 48.19 and 47.18	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>of the Neighbourhood Plan which were conversions of buildings in the countryside. In any case they would be subject to the Town and Country Planning (General Permitted Development) (England) Order 2015, and therefore would just be subject to Prior Approval. These should be included in the Draft Plan as allocated dwellings, not as windfalls. They are KNOWN ABOUT. In the case of the buildings at Hospital Farm, there were up to 6 possible dwellings there on a site submitted to the Neighbourhood Plan by Herefordshire Council and in the "Revised Smallholdings Policy 2015 - Updated January 2016" it is stated "As part of the disposal process, the council will consider potential redevelopment of surplus farm houses and farm buildings</p> <p>This immediately reduces the numbers of new builds needed by 10. But there are others which could be included as well - see my comments under para 6.1.30. Paragraph 4.8*9 of the Core Strategy states: "Historically it is evident that much rural housing has come forward on small sites, often for individual dwellings, being allowed through the application of planning policy rather than the allocation of housing sites. Additionally, significant numbers of new housing continues to be delivered through the conversion of rural buildings, many being redundant agricultural buildings on farmsteads. Paragraph 48 of NPPF indicates that an allowance may be made for windfall if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source.'</p> <p>As mentioned earlier, there were deep concerns by other Parish Councils that Herefordshire Council had under-provided for windfall development at the Core Strategy strategic level. The consequence is of course that there will be an excessive number of new builds in the rural areas generally, resulting in a large overshoot of any</p>		

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	<p>'indicative' targets.</p> <p>There is evidence that this will be the case in Burghill Parish/ too. In the past year, there have been 7 applications for rural conversions which are either prior approvals or change of use to residential which have or almost certainly will be given planning permission, over and above extant permissions already netted off the gross 'target' for Burghill Parish. That is 7 windfalls in one year. The Plan period has 15 years to run meaning that at this rate, there would be 105 dwellings provided by windfall conversions.</p> <p>The planning completions and commitments netted off the Plan 'target' from 20112014 (1st April) were 19. There was another, won on Appeal in 2014. Since then there are the 7 recent rural conversions mentioned in the previous paragraph. That totals 27 windfalls in 5 years which equals 5.4 per year. The Core Strategy provides for a windfall trajectory of 850 over the last 17 years of Its period, on a rural Target of 5,300</p> <p>i.e. windfalls are an (under-provided) 16% of that. Burghill Parish has had windfalls at a rate of 5.4 per year, so for the same next 17 years of its Plan period, that would equate to $17 \times 5.4 = 92$ windfalls. That is the compelling evidence that such sites have consistently become available in the Burghill Parish local area and will continue to provide a reliable source. Using the Core Strategy Trajectory derived percentage of 16% is inappropriate and mistaken for Burghill Parish, it is TOO LOW.</p> <p>The "deduction for 20 windfalls" includes 10 submitted sites which were known about, and which should not have been included as windfalls, but counted as allocations. That leaves a provision in the current Draft Plan for 'real' windfalls which is a ridiculously low 10. But I have just demonstrated in the previous paragraph that it should, or could, be over 90!</p>		

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	The plan must reconsider the included element for windfalls and make the number realistic. At the same time, there are 10 dwellings which should be removed from the existing windfall deduction, and netted off as proper allocations. Burghill Parish does not need to have the excessive numbers of new housing which this Draft Plan provides for, because if we do, then the Parish will vastly overshoot its targets.		
49.28	Page 34 Para 6.1.21 Text as 48.20	See response to 48.20	No change
49.29	Page 34 Para 6.1.23 Text as 48.21	See response to 48.21	No change
49.30	Page 35 Para 6.1.25 See 47.2	See response to 30,44, 47.6 and 47.20	No change
49.31	Page 35 Para 6.1.26 Text as 48.23	See response to 15.2, 28, 47.21 and 48.23	No change
49.32	Page 35 Para 6.1.27 Text similar to 47.22	See response to 47.22	No change
49.33	Page 35 Para 6.1.28 This is a description which equally fits Tillington between Crowmore Lane and the Cricket Club. However, in the case of Tillington Common it is untrue. The "gaps" which are mentioned are within the curtilages of the clusters of properties mentioned in my comments concerning the erroneous Paragraph 6.1.27, particularly the 41 dwellings. As for it being "a countryside location with no defined identifiers as a village in the normal sense" that is nonsense. That is written because someone does not want it to be considered for development. Tillington Common is a nucleated settlement which is centred around the old Stonehouse Farm Heath Farm near the Badnage Lane/C1095 Tillington Road Junction (near the post box and bus turning point), and which developed mainly south eastwards towards the old Rose Farm both along the north and south side of Tillington Road and parallel to that on the parallel track to the north. Of anywhere in Tillington, the settlement of Tillington Common is more definable as a village settlement than anywhere else. Which is why Herefordshire Council used it in the Rural Background	See response to 47.23 and 48.3	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>Papers (erroneously, for different reasons as described in the Spring 2014 Representation) to be a settlement for development (excerpt below): (Text removed *****) And, as mentioned previously, in planning terms Tillington Common and Tillington are BOTH countryside locations because previously they have BOTH been defined under the Unitary Development Plan as under "Policy H7 - Housing in the countryside outside settlements". How many times is it necessary to make this point? (Text removed *****)</p>		
49.34	<p>Page 36 Para 6.1.29 Both Tillington Common, and the area of Tillington bounded by Whitmore Cross/Crowmore Lane and the Cricket Club have NO mains sewage services, NO mains drainage services, and they are served by the SAME bus service. The Bell Inn is an isolated roadside rural pub which serves both settlements, and people from Burghill are rarely seen in it because they frequent the Burghill Golf Club or elsewhere. The shop serves people from both Tillington and Tillington Common, and it is an accident of history that it just happens to be located near Whitmore Cross because of the premises there but it could disappear at any time whether or not more housing is built. Both Tillington and Tillington Common are 'unsustainable' locations. Putting housing estates in them may enrich landowners and their agents but it won't make these places any more sustainable.</p>	See response to 48.3 and Note 7	No change
49.35	<p>Page 36 Para 6.1.30 I do not for a moment suggest that the density should be anywhere near that, but for Tillington the above HIGH density (not "modest") of 16 to 20 per Hectare is double to three times existing densities. That is unacceptable because quite clearly it does not reflect the character and appearance of Tillington.</p>	See response to 22, 47.25, 48.21, 48.23 and 48.19	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>It is mystifying why these densities vary so much. At Tillington for example 16/17/20 dwellings per Hectare. Completely bizarre, inconsistent, illogical, no explanation. Clearly Tillington is proposed to have disproportionately high new housing densities thrust upon it (16 to 20 dwellings per Hectare compared with the existing 7 dwellings per Hectare). On the other hand, Burghill, that favoured village, has escaped with a much more modest 12 dwellings per Hectare for the imaginary Redstone Site 21 (see below) and 14 dwellings per Hectare for the Pyefinch* site already given Planning Permission, which compares with the existing average 10.5 dwellings per Hectare for Burghill village. This is blatantly unfair. (Text removed *****)</p> <p>Paragraph 55 of the National Planning Policy Framework states:</p> <p>"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby."</p> <p>The placement of housing at this concentration at Whitmore Cross (24 allocated houses within a settlement boundary containing 18 existing houses, i.e. +133%) is totally disproportionate with a CALLOUS DISREGARD for the existing settlement characteristics. This does not align with Para 4.8.15 of the Core Strategy "Within these settlements carefully considered development which is proportionate to the size of the community and its needs will be permitted "</p> <p>It is INCONSISTENT and DOES NOT ALIGN with NPPF para 55 because development in this location does not support services in a village nearby (i.e. Burghill). If anything, the main thrust of development should be in or adjacent to</p>		

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	<p>Burghill, which has always been the main settlement in the Parish, but with the Pyefinch site and the proposed Redstone site Burghill village will only receive 14% growth, unlike Tillington where it would be that ridiculous, disproportionate 133%. That is One Hundred and Thirty-Three per cent (more than double), not Thirty-Three percent.</p> <p>It is notable that Tillington has neither Mains Sewage nor Mains Drainage nor Pavements (Footways in old-fashioned parlance), yet 24 of the proposed new houses have been targeted at Tillington, while Lower Burlton has been targeted with 23 new houses, and Burghill (with mains sewage & drainage & pavements) has been targeted with only 36 new houses (12 at Redstone plus 24 at Pyefinch. I say "only" because relative to its size, Burghill has clearly been 'protected' by the partiality of the Steering Group and Parish Council while the other locations have not. Taking each site in turn (but not 2D, 2B and White Roses, I am sure that people from Lower Burlton will comment on them): (Text removed *****)</p>		
49.36	<p>Page 37 Policy B1 Even in the light of my suggestion above, there still needs to be a Policy to ensure that whatever development there is, is sensitive. The density figure in (a) is too general, it needs to be qualified. "in context with the immediate surrounding area" is insufficient. This must be changed to be "not exceeding the average housing density of the existing properties in the settlement boundaries excluding allocated sites". This is easy to calculate.</p>	<p>Examiners have been taking out specific densities from NDPs and amending the wording to reflect the character of the surrounding area, which is as the policy presently states.</p>	No change
49.37	<p>Page 37 Para 6.1.31 The existing traveller's site to the west of Manor Fields was a Change of Use from Agricultural to a 2 family Gypsy site permitted in 2006. The permission was for the benefit of</p>	<p>The Steering Group and Parish Council consider that there is sufficient control in the allocation/determination of travellers sites within the Strategic Policies of the Herefordshire Core Strategy</p>	No change

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	<p>named individuals taking into account special circumstances and it specifically stated that on cessation of their occupation the land shall revert to agricultural use." The statement supporting the retention of the existing traveller's site by Burghill Parish Council should be qualified with these words: "... recognising that on cessation of the occupation by the named individuals in the Planning Permission the land shall revert to agricultural use as per the original condition of the Planning Permission.'</p> <p>Again, you are being overtaken by events. Planning Application P 151110/F for 4 gypsies and travellers' caravans on the former Three Shires Nurseries is being considered by the Planning Committee on 16 March 2016. The Officer's Report to Planning Committee recommends that planning permission be granted.</p> <p>It is hard to see that there will be reasons for the Planning Committee to turn it down. It would be prudent to be ready to include these 4 gypsies and travellers pitches in the NP should this be approved by the Committee.</p> <p>And if you revisit the Draft Plan to include these traveller sites, there is no good reason why you should not revisit it to reassign housing allocated sites on the basis I have suggested in my comments on Para 6.1.30.</p>		
49.38	Page 39 Policy B2 Text similar to 48.29	See response to 48.29	No change
49.39	Page 40 Policy B3 Text Similar to 47.27 and 48.30	See response to 47.27 and 48.30	
49.40	Page 40 Policy B4 Text same as 48.31	See response to 7.27 and 48.31	
49.41	Page 44 Para 6.4.5 Text similar to 48.32	See response to 48.32	No change
49.42	Page 44 Policy B7 Part of text included in 48.33	See response to 48.33	No change

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49.43	Page 47&48 Policy B8 Text similar to 48.34	See response to 48.34	No change
49.44	Page 48 Para 6.5.9 "The Parish Council and the residents of the Parish consider it important to protect the character and setting of Burghill, the other housing groups within the parish and the surrounding landscape. " (Text removed *****) This is Burghill-centric. Both Tillington and Lower Burlton are having housing foisted on them by people who do not wish Burghill to bear its proportionate share of development. For the purpose of dumping housing on them, Tillington is a "settlement", and I do not know what Lower Burlton is. But for the purpose of landscape character, they are mere "housing groups" (Text removed *****)	The sentence was written bearing in mind that Burghill is the larger settlement with other housing groups within the Parish.	No change
49.45	Page 49 Policy B9 Here we go again. "(b) Development proposals should seek to preserve and where possible enhance the character of the village" The village. Singular. This was written for Burghill village.	See response to 47.28	
49.46	Page 50 Para 6.6.2 Text same as 48.35	See response to 48.35	
49.47	Page 50 Para 6.6.3 Text same as 48.36	See response to 48.36	
49.48	Page 51 Para 6.6.11 Text same as 48.37 (Further Text removed *****)	See response to 48.37	
49.49	Page 53 Para 6.6.15 Text same as 48.38	See response to 48.38	
49.50	Page 58 Policy B14 The Policy includes a proposed Solar Farm Site at Winslow on Map 7. Then there are proposed Policy criteria. The Policy criteria	The Parish Council consider that the proposed policy aligns with the relevant policies of the Herefordshire Core Strategy.	No change.

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	<p>are broadly satisfactory. But they do not fully reflect or align with Core Strategy Policies, which contains the overarching policies for Herefordshire.</p> <p>In particular criteria (d) has obviously deliberately been written in a narrow way to ensure that the site at Winslow would be permitted. As written, it states:</p> <p>"(d) there is no detrimental impact on any neighbouring land uses, including Listed Building or Conservation Area; "land uses" is deliberately too narrow. For example, someone wishing to ensure that a solar farm on this proposed site would gain permission — for example, someone who desired a change of use on it for ulterior motives — could argue that the Listed Building and Conservation Area would not be not "neighbouring" the proposed solar site, although it would in fact detrimentally affect their setting.</p> <p>Therefore, the following needs to be done:</p> <p>Clause (d) should be struck out and the following clauses substituted for it, and the word 'neighbouring' should not be included:</p> <p style="padding-left: 40px;">"the proposal does not adversely affect residential amenity"</p> <p>[consistent with CS Policy SD2 Renewable and low carbon energy generation]</p> <p style="padding-left: 40px;">"the proposal does not adversely impact upon international or national designated natural and heritage assets, whether formally designated or not, including Listed Buildings or Conservation Areas and their settings, [consistent with CS Policy SD2 Renewable and low carbon energy generation and CS Policy LD4 Historic environment and heritage assets and CS Policy E4 Tourism]</p> <p>There should be an additional clause:</p> <p>'the proposal does not adversely affect the visual amenity of, and should have special regard for, cycling and walking routes and trails</p>		

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	<p>[consistent with CS Policy E4 Tourism and BNP paras 3.26 & 3.27 which seek to encourage tourism]</p> <p>Note: with regard to the required additional clause above, Three Rivers Ride bridleway and path goes right past this proposed site, and approaching from Burghill Church, the solar site — an alien, discordant structure in a countryside location on the top of a hill — will be a visible blot on the landscape, undermining the visual amenity of this trail.</p> <p>It is notable that at distances up to 1 km from the site, the site is also visible from the southwest (from Burghill), and from the south and east (from the Bridleway: Church to St. Donats and Footpath: Church to Lion Dairy, both Public Rights of Way).</p> <p>In contrast, it is not visible from the north, north-east and north-west and west including from properties near St Donat's. They would not see the site, but walkers and properties within the Burghill Conservation area are likely to see it.</p> <p>The proposed Solar Site in this Draft Plan is not suitable. While at a superficial level the idea of a solar "farm" might be appealing, the reality is that the proposed site is on the top of a hill, it slopes from North to South and from Northwest to Southeast, and therefore would impinge on the character of the landscape, the heritage assets at Burghill, the visual amenity of the countryside, and possibly the residential amenity of nearby properties to the south.</p> <p>There is no better way to illustrate this than to overlay these features — Heritage Assets (Listed Buildings & Conservation Area), Three Rivers Ride Trail and Public Footpaths — IN THEIR SETTING, superimposed onto the beautiful aerial photograph of Burghill which is on the front page of Burghill Parish Council's website: Text removed *****)</p>		

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49.51	<p>Page 60 Para 8.2 The lack of consultation with the community, and lack of engagement with the community in the development of the Draft Plan have been quite astonishing. And this paragraph perpetuates that attitude. The Parish Council needs to read and understand what its role should be in the context of the National Planning Policy Guidance with respect to consultation. It might be in its interest to familiarise itself with the Gunning principles, only last year confirmed by the Supreme Court.</p> <p>This para 8.2 states "Where the need for change is identified the Parish Council will work with Herefordshire Council to produce updates and amendments where necessary." This is appalling, and just illustrates the attitude which has dominated plan-making in Burghill Parish. It is NOT for the Parish Council "to produce updates and amendments where necessary", that is for the community to do as part of what should be the open and transparent Neighbourhood Planning Process.</p> <p>The Parish Council has no right to fiddle with the Plan, any "updates and amendments" should be consulted on.</p>	<p>See 48.1 with regard to response on Consultation. When the Burghill NDP reaches the end of the process it will become part of the development plan for the area for the plan period until 2031.</p> <p>When the Core Strategy is reviewed it is expected that the Burghill NDP will form part of that process.</p> <p>Currently there is no process in place for any review of an NDP without going through the whole process from the beginning</p>	No change.
49.52	Page 68 & 69 Text similar to 48.42	See response to 48.42	No change
49.53	Page 70 Appendix 3 Text similar to 48.43	See response to 48.43	No change
49.54	Page 64 Map 4 Text similar to 48.44	See response to 48.44	No change
49.55	Pages 53, 54 & 66 Para 6.6.15 B10 Map 6 Text similar to 48.45	See response to 32 and 47.26	No change
49.56	Page 34 Para 6.1.23 This is a second further objection following the accidental discovery of a "Site Assessment Report" buried on the Burghill Parish Council website which was only put onto	See response to 48.46 and 48.47	No change

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	<p>that website on 17 February 2016, FOUR WEEKS AFTER this Regulation consultation was supposed to have started. Para 6.1.23 claims that "sites have been independently assessed by Kirkwells in line with Guidance Note 21 issued by Herefordshire Council." This is not wholly true. That Guidance, suggests that:</p> <p>a. the site selection process should be carried out in an open and transparent way, including consultation with the community and the production of a full evidence base to support and justify the conclusions reached. But in contrast, the process has not been open and transparent; the community consultation has been virtually non-existent; the 'full evidence base' has not been published; and the belatedly-published Site Assessment Report is the nearest it gets to 'evidence', and it is certainly not 'full'.</p> <p>b. Connection and availability of utilities such as water supply and drainage are supposed to be important considerations. But in contrast, drainage and sewage have not been considered in the Report nor in the Draft Plan. For a place like Tillington which is without mains drainage and sewage, compared with Burghill which is connected, this is a dreadful omission.</p> <p>the concept of a possible site should be assessed the basic idea of how the site may be developed appropriately, and consideration of better ways of doing it. This has not been done properly.</p> <p>But in contrast, the concept of particular sites has not been assessed adequately. Where large sites have been submitted, for example by the Duchy around Burghill, or by Farmcare (ex Co-op) around Tillington and Burghill, the option only to develop smaller parts of these sites, thereby avoiding constraints and also obtaining a more acceptable scale like the groups of up to 7 houses which were the</p>		

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	<p>most favoured in questionnaire responses, has not been considered, and the sites have just been rejected out of hand.</p> <p>Timescales for Development (0-5 years, 6-10 years, 11-15 years, 16-20 years) should be considered.</p> <p>But in contrast, this has not happened at all. The way it has been done, without timescales, implies that there is going to be a free-for-all on the selected sites (many of which the community has not had a proper say in), and development could start any time soon. Is this omission deliberate, or just due to incompetence?</p>		
49.57	<p>Page 34 Para 6.1.23</p> <p>Restrictive covenants should be considered.</p> <p>But in contrast, restrictive covenants have not been considered at all.</p> <p>Not mentioned in the Guidance, but a blindingly obvious consideration to people who actually live in Tillington but who have not been adequately consulted with, is the fact that Tillington has no pavements.</p>	<p>Restrictive Covenants are governed within other legislation, and are not a planning consideration.</p>	<p>No change</p>
49.58	<p>This is a further objection following the accidental discovery of a "Site Assessment Report" buried on the Burghill Parish Council website, and on enquiry to the Parish Clerk, it was established that it was only put onto that website on 17 February 2016, FOUR WEEKS AFTER this Regulation consultation was supposed to have started.</p> <p>Para 6.1.30 contains a Table which includes a column 3 which is headed "Consultants' Rating figure". I take issue with the whole basis for rating sites because the Site Assessment Report (now belatedly published, but not publicised) has flaws and therefore cannot properly inform:</p> <p>1. The Assessment Report scores constraints for the sites assessed, but does not positively identify each</p>	<p>See response to 48.46 and 48.47 and 47.8. All comments have been responded to elsewhere within this response log.</p>	<p>No change</p>

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	<p>constraint scored, and it also has 2 sets of constraints assessments, so it is unclear whether constraints have been counted twice.</p> <p>2. The Report calculates 'dwelling capacity' for assessed sites, citing a figure of 30 dwellings per Hectare in Herefordshire Council Core Strategy Policy SS2. However, that policy also says that the figure is countywide and "this may be less in sensitive areas". In Tillington the existing housing density is on average only about a quarter of that, and in Burghill about a third of that.</p> <p>3. Over 40 sites were submitted to the Neighbourhood Plan, but many have not been assessed at all. This seems to be because someone (not the community during consultation because people have not been properly involved) has decided that some sites are "in the countryside" and therefore they should not bother to have them assessed at all.</p> <p>4. Former Farm buildings have only in some cases been assessed, but then even where they scored well, they have been left out of the draft Plan. They are being treated as though they are future 'windfalls' in the draft Plan which is crazy because (a) conversions must surely be preferable to new builds in rural areas (b) they cannot be windfalls if they were submitted to the Plan and are known about (c) they depress the numbers included for true future windfalls, (d) by not including most conversions, and preferentially including new build housing, the growth target will inevitably be overshot. Some more housing, yes. Excessive new housing, no.</p> <p>5. Then, for Tillington, someone (not the community because it has not been consulted) has decided on a Settlement Boundary and just drawn one around 18 properties vaguely near Whitmore Cross, then allocated 24 extra houses on that person's chosen sites. That is SEVEN</p>		

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	<p>TIMES the so-called 18% "proportionate" "indicative" growth target. The Site Assessment Report has then scored sites at Tillington on whether they are "within the proposed settlement boundary" which someone has undemocratically. determined Obviously, sites outside their proposed settlement boundary score less well.</p> <p>6. At Lower Burlton in the south of the Parish, the large sites submitted have been assessed on the basis that their total areas were developed, and developing smaller, less constrained and more acceptable parts of them has not been considered. So they have been rejected out of hand. When the larger sites are scored against more appropriate, smaller housing groups, the assessment scores improve significantly because constraints are avoided. (Really, the residents in Hospital Houses should have been consulted on all this. They probably do not realise that this should be their Plan too, nor that the people who 'voted' for development at Lower Burlton would probably have been mainly from Burghill, because as usual, the meeting place is the Simpson Hall.)</p> <p>7. Again at Lower Burlton, the buildings at Hospital Farm (which Herefordshire Council rightly or wrongly wants to dispose of) have been assessed with a fairly favourable score but have not been included in the Draft Plan. That would be 6 conversions which would avoid building 6 new houses somewhere in the Parish.</p> <p>8. At Lower Burlton there was a Site 2C which has some apple trees on it. The assessment says "Orchard — Possible Contamination". Site 2C was rejected but it is well known locally that some properties have septic tanks there, and with a high water table they overflow and contaminate the ground. Unfortunately, the association of 'possible contamination" with "orchards" has been copied over to all orchard sites in the Parish in this Assessment Report, and it is unclear whether that is erroneous</p>	<p>Based on comments from Environmental Health officers, orchards and former orchards have the potential for land contamination due to spraying of fertilisers etc. associated with their former use.</p>	

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	<p>(because the 'contamination' only really relates to that particular site, or if there is other 'contamination' on all orchard sites (for example fertiliser, which could be anywhere and in any case would dissipate naturally). The net result is that many sites containing some commercial orchard have been marked down for no good reason.</p> <p>9. Around Burghill (just like at Lower Burlton) the large sites submitted have also been assessed on the basis that their total areas would be developed, and developing smaller, less constrained and more acceptable parts of them has not been considered. So they have also been rejected out of hand. When the larger sites are scored against more appropriate, smaller housing groups, the assessment scores improve significantly because constraints are avoided. Because the Duchy and Farmcare both submitted fairly large sites, it means that for Burghill development on genuine developable sites (other than Pyefinch which now has Planning Permission in advance of the Draft Plan) has been rejected. Crazy! It is the main settlement in the Parish. There could easily be sensitive, small development (up to 7 houses) on sites tightly adjacent to Burghill's existing settlement boundary, on sites submitted by Farmcare east of Bakers Furlong, and by the Duchy north of the Copse, and again by the Duchy just south of Haymeadow/Lower Orchards.</p> <p>10. In addition, the assessment for the Farmcare Site east of Bakers Furlong says "existing estate road not capable of serving the site". Actually, it capable. The problem is that someone is trying to block access to that site because in the draft Plan they have sneakily extended an area of "green space" north across the end of a cul-de-sac at Bakers Furlong, thereby preventing what otherwise would be sustainable development.</p> <p>11. At Tillington, as already mentioned, someone (not the community, because that has not been consulted on this)</p>		

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	<p>has decided on where a Settlement Boundary will be drawn. It includes 24 houses proposed to be built on 3 sites.</p> <p>a. One site is what is described as "Site 10 Tillington Business Park". But it is not 'Tillington Business Park', it is a greenfield site to the north of it. The problem is that the consultants have scored (or been told to score) the site based on both Tillington Business Park and the site proposed for housing. So this is all obfuscated, and there are at least 3 misleading factors:</p> <p>firstly, the part to the north has been assessed to have access. It doesn't, the access is actually the 'Business Park' access, so inhabitants of the new proposed housing would have to go through the Business Park, the entrance/access to which is barred by heavy locked steel gates from 6pm to early morning, so that access seems rather improbable (unless of course the real agenda is for the 'Business Park' is to be demolished, although that surely cannot be, because the Draft Neighbourhood Plan claims that it is to be 'protected for employment use.)</p> <p>secondly, the part to the north has been assessed to be in 'proximity to the proposed settlement boundary. It is (surprise, surprise) within that proposed settlement boundary which has been PREDETERMINED WITHOUT COMMUNITY CONSULTATION. so it scored higher on an unfair and false basis because it is within someone else's imposed settlement boundary.</p> <p>thirdly, Site 10 has been assessed to be "on a bus route". That is a crafty piece of obfuscation, because it is the 'employment use' part of the site which is on a bus route, not the part to the north where the housing is proposed. By the assessment report's own definitions, the part to the north where the housing is proposed should have been assessed as "close to a bus route". Again its score has</p>		

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	<p>been fiddled upwards by the way the site has been presented. The consequence is that Site 10's assessment scores have been boosted. It becomes one of the worst sites when properly scored, on its own.</p> <p>b. Another site is the one behind The Bell. The whole site has been assessed by the consultants as scoring the best in the area. However, in the Draft Plan only 4 houses have been allocated on it, and the small site actually allocated is a strange shape which indicates that it has been allocated more to provide an access for the adjacent site behind the 'Business Park' rather than because it</p>		