

2017

# Wyeside NDP 2011 – 2031: Consultation Statement



Wyeside Group  
Parish Council  
October 2017

## Contents

1	Introduction.....	4
2	Chronology.....	6
2.1	Initial Invitation to the Wyese Group Community .....	6
2.2	Formal Designation of the Wyese Group.....	6
2.3	Public Involvement .....	8
2.4	Request for Wyese Community Members to Join the Steering Committee.....	8
2.5	“Planning for Real” and the Core Infrastructure Levy (CIL).....	9
2.6	The Younger Generation.....	11
2.7	Wyese Group of Parish Councils’ Role .....	11
2.8	Prioritisation of Comments Received from Public Events.....	11
2.9	Design of the Questionnaire.....	12
2.10	NDP Vision Statement .....	13
2.11	Questionnaire Sign-off, Circulation and Analysis .....	13
2.12	Draft Neighbourhood Development Plan (NDP).....	13
2.13	Regulation 14 Comments Register and Public Meeting .....	15
3	Public Meetings/Open Days – Concerns/Issues.....	16
3.1	Affordable Housing and Employment .....	16
3.2	Environment and Size of Housing Developments .....	16
3.3	Facilities and Services.....	16
4	Questionnaire Responses/Issues.....	17
4.1	Employment.....	17
4.2	Housing .....	17
	Affordable Housing.....	17
4.3	Environment.....	17
4.4	Facilities .....	17
4.5	Transport and Safety .....	17
4.6	Key Issues .....	17
5	Regulation 14 Summary of Comments and Changes.....	19
5.1	Bredwardine Parish Church and its Surroundings .....	19
5.2	RIBA Best Practice Village Design .....	19
5.3	Environment and Heritage .....	19
	Historic England .....	19
	Natural England .....	20
	Environment Agency .....	20
	Dŵr Cymru Welsh Water (DCWW).....	20
5.4	Spatial Strategy – Expansion of Village Centres Only .....	21
5.5	Affordable Housing.....	21
5.6	Tourism .....	22

# Wyeside NDP 2011 – 2031: Consultation Statement

---

5.7 Detailed Review of Comments and Responses/Actions ..... 22

**Appendix 1: Open Days – Public Comments and NDP Responses/Actions.....23**

**Appendix 2: Regulation 14 Consultation with Stakeholders, Comments and NDP Responses/Actions.....66**

**Appendix 3: Register of Correspondence for Regulation 14 Consultation.....101**

**Appendix 4: Regulation 16 Consultation Correspondence March 2017 and Progression to Examination.....138**

**Appendix 5: Examination Correspondence and Representations, concluding with the withdrawal of the Wyeside Neighbourhood Plan by the Wyeside Group of Parish Councils.....140**

**Wyeside Neighbourhood Development Plan 2011-2031 October 2017** – provided under separate cover.

**Wyeside NDP 2011-2031: Basic Condition Statement October 2017** – provided under separate cover.

**Wyeside NDP 2011-2031: Consultation Addendum 1: Questionnaire, Analysis of Responses October 2017** – provided under separate cover.

**Wyeside NDP 2011-2031: Environmental Report October 2017** – provided under separate cover.

**Wyeside NDP 2011-2031: Habitat Regulations Assessment Addendum Report October 2017** – provided under separate cover.

## 1 Introduction

This Consultation Statement has been prepared in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Paragraph 15 (2)<sup>1</sup> which defines a “consultation statement” as a document which:

- Contains details of the persons and organisations that were consulted about the proposed neighbourhood development plan;
- Explains how they have been consulted;
- Summarises the main issues and concerns raised by the persons and organisations consulted; and
- Describes how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Development Plan (NDP).

The consultation process has included public meetings, Open Days at local events such as fetes with the opportunity to submit comments, and an extensive questionnaire, which was delivered to every household. Fliers were distributed to every household in the parish on two occasions and regular use was made of the parish magazines, which are also delivered to every household, for frequent updates. Regular use was also made of the Bredwardine and Brobury community website for these updates, as well as providing feedback to residents from the consultation process.

The remainder of this Consultation Statement is structured as follows:

**Section 2 – Chronology** – The various stages in the consultation process, public meetings, open days, design of the questionnaire and development of the NDP with references to all the events and information that it comprised in chronological order.

**Section 3 – Public Meetings/Open Days - Summary of Comments** – A summary of comments and issues raised in public meetings and open days. Comment by comment NDP responses and actions are set out on page 23, Appendix 1: Open Days – Public Comments and NDP Responses/Actions below. Unfortunately, the scope of the NDP, which is about land use, does not enable transport, a number of facilities and services concerns and issues to be addressed. However, they have been recorded in the comments register and raised with the Wyeside Group of parishes.

**Section 4 – A Summary of Issues Arising from the Questionnaire** – This summarises the main points and issues arising from the responses to the questionnaire. The draft NDP published on 16 May 2016 for Regulation 14 represents the Steering Committee’s response and actions with regard to these concerns/issues, insofar as the scope of the NDP allows. A comprehensive analysis of the questionnaire responses is set out in NDP 2011-2031: Consultation Addendum 1: Questionnaire, Analysis of Responses – provided under separate cover.

**Section 5 – A Summary of Comments from Regulation 14 Stakeholders** – This summarises the main points arising from stakeholders during the Regulation 14 Consultation process that commenced 16 May 2016 and completed 6 weeks later on 24 June 2016. The NDP Steering Committee detailed responses, actions and changes to the draft NDP, as a consequence of these comments are set out on page 66, Appendix 2: Stakeholder Comments from Regulation 14 Consultation Process and NDP Responses/Actions.

**Appendix 1: Open Days – Public Comments and NDP Responses/Actions** – This section starting on page 23, sets out in tabular format all of the comments received from the public meetings and Open Days, and the Steering Committee responses and actions leading up to development of the draft NDP.

**Appendix 2: Stakeholder Comments from Regulation 14 Consultation Process and NDP Responses/Actions** – This section starting on page 66, sets out chronologically, the comments from stakeholders, and the Steering Committee responses and actions preparatory to submitting the draft NDP for independent examination. The September 2016 draft NDP complies with the Steering Committee responses and actions in this section.

**The September draft Wyeside NDP 2011-2031 and the NDP 2011-2031: Basic Condition Statement** submitted for independent examination are provided under separate covers.

**NDP 2011-2031: Consultation Addendum 1: Questionnaire, Analysis of Responses** – This section sets out the questionnaire analysis and conclusions, as a basis for formulating and developing the draft NDP for review by the community and for consultation with various stakeholders in compliance with Regulation 14. Addendum 1 is provided under separate cover.

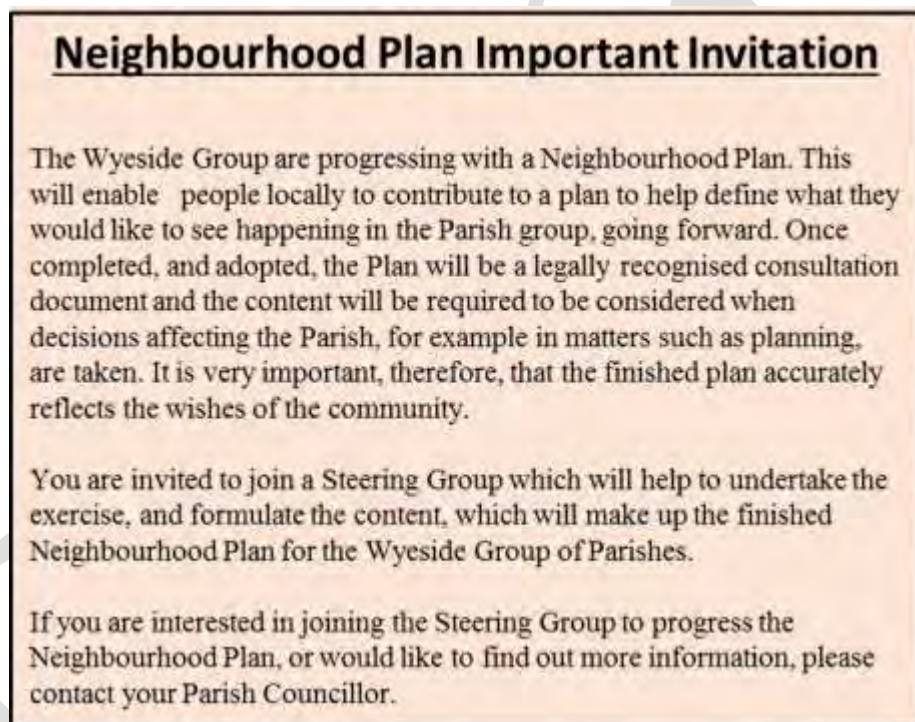
Following successful completion of the independent examination these documents will be published and circulated within the Wyeside community, preparatory to the referendum.

## 2 Chronology

The Wyeside Group of Parishes of Blakemere, Bredwardine, Moccas, Preston-on-Wye and Tyberton 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) explaining the available options for the development of a NDP.

### 2.1 Initial Invitation to the Wyeside Group Community

In February 2013 the Wyeside Group of parishes decided to form a steering group, made up of both parish council members and other interested parishioners, to commence the preparation of a NDP, and applied to Herefordshire Council for designation as a neighbourhood area. A notice to this effect, set out in Figure 1 below, was published in church magazines and on public notice boards:



**Figure 1 – Initial Invitation to the Wyeside Group Community**

This initial meeting was designed to foster interest in the Plan, identify those that would be prepared to assist in development of the NDP and note any initial concerns/comments. Concerns/comments arising were included in the public events “Open Days” register of comments generated from the “Planning for Real” activities that took place during the summer of 2014 in each of the five parishes. The full set of comments received from all of the public events and meetings and responses/actions are set out in Appendix 1: Open Days – Public Comments and NDP Responses/Actions.

### 2.2 Formal Designation of the Wyeside Group

The Wyeside Group area was formally designated by Herefordshire Council in April 2013 and is set out in Figure 2 – The Five Parishes within “Wyeside” showing the parish boundaries, overleaf.



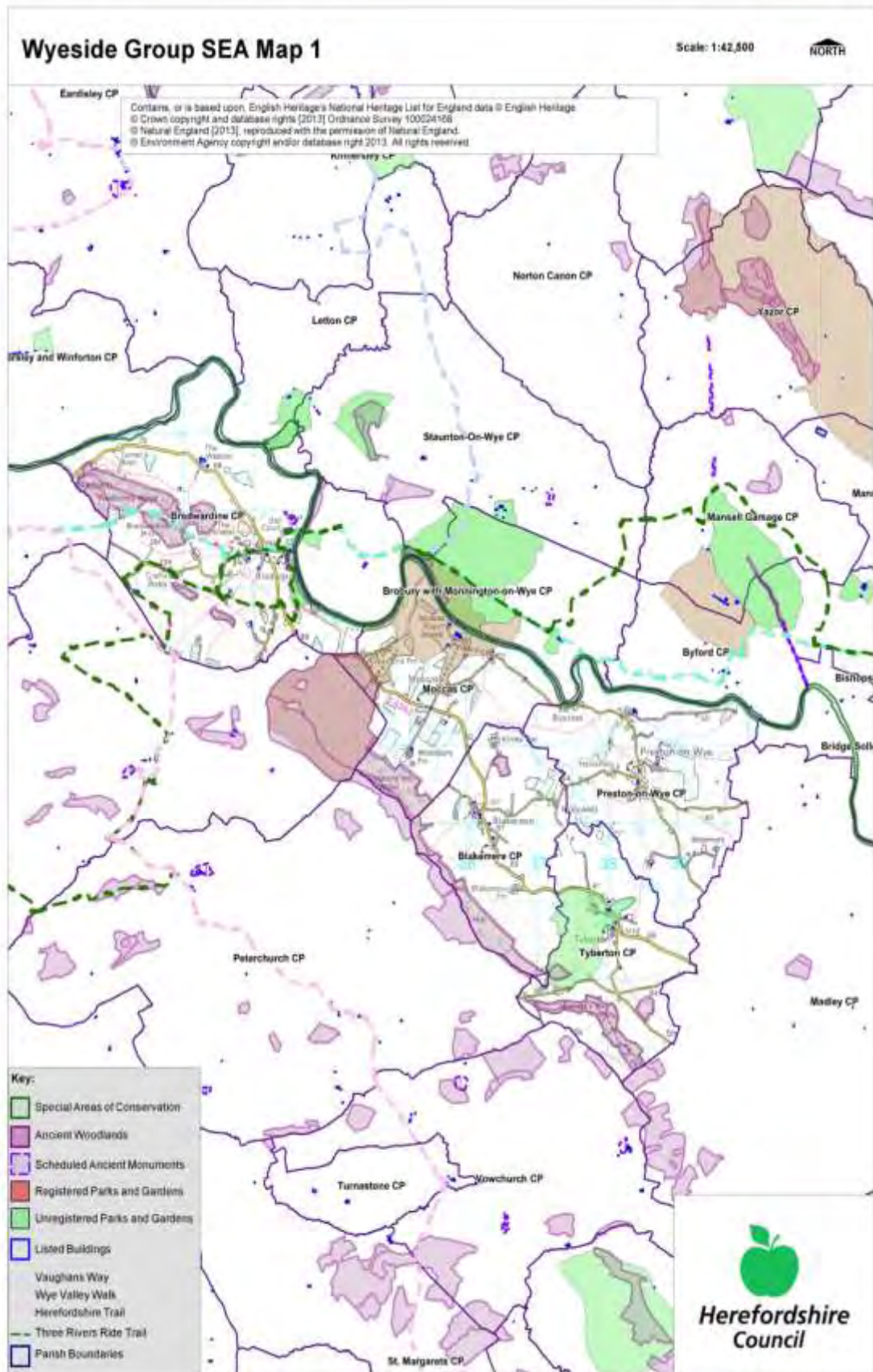


Figure 2 – The Five Parishes within “Wyeside”

## 2.3 Public Involvement

In July 2013 an invitation to attend a public meeting set out in Figure 3 below, was published in church magazines and on public notice boards in the five parishes:

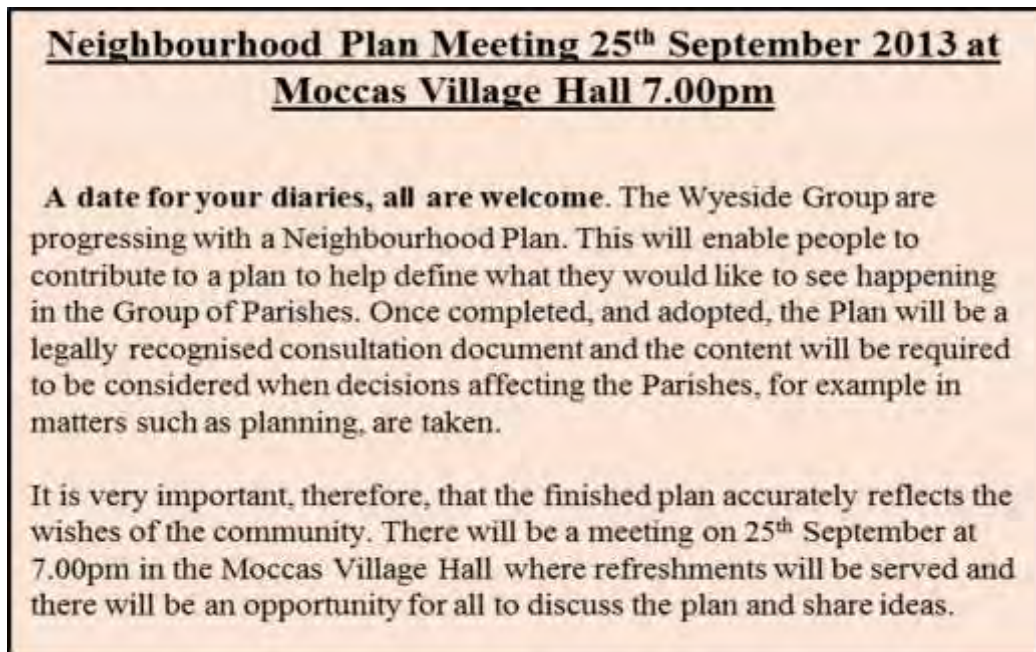


Figure 3 – Initial Public Meeting

## 2.4 Request for Wyese Community Members to Join the Steering Committee

In December 2013 a further invitation, set out in Figure 4 below, was published inviting members of the public to become involved in setting up a steering committee:

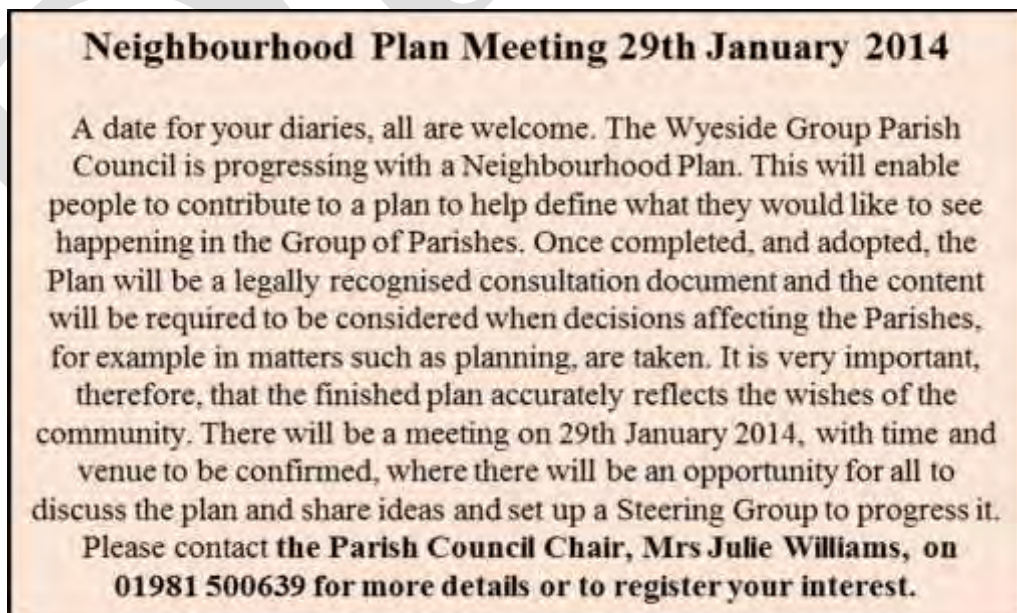


Figure 4 – Invitation to get involved in the Steering Committee

This was followed by a further notice set out in Figure 5 overleaf, with venue and time details below:



**YOUR VILLAGE NEEDS YOU!**

**NEIGHBOURHOOD PLAN**

**Wyeseide Parish Council is starting the process of creating a Neighbourhood Plan which will shape the future of our community for the next 20 years.**

**A Neighbourhood Plan gives the local community influence in the planning process putting our views on a par with the local authority in planning land development, new housing and related issues such as rural employment and renewable energy schemes.**

**We need volunteers from the village to get involved by joining the steering committee that will look for the final plan to fairly reflect the views of the community.**

**An initial meeting is being held on Wednesday 29th January in Moccas Village hall at 7.30pm**

**If you are interested in getting involved in this important project please come along.**

**If you would like further information please speak to councillors**

**Owen Whittall 500250 or Annie Clipson 500634**

**Figure 5 – Venue and time of meeting for volunteers to join the Steering Committee**

A primary concern was that the Steering Committee should be representative of all areas within the five parishes. At the two initial meetings with the general public there was an open invitation for anyone who was interested to get involved, and representation was actively encouraged. This was followed by further invitations at Open Days for any interested persons to get involved.

## **2.5 “Planning for Real” and the Core Infrastructure Levy (CIL)**

At the NDP Steering Committee meeting on 9 April 2014 a draft “Planning for Real” information sheet (flyer) was tabled and evaluated. It was decided to add more detail with contact names and details for each parish, and remove any reference to the Core Infrastructure Levy (CIL) payments. It was considered that the target of c. 39 houses for all five parishes over 20 years, was unlikely to be enough to enable Wyeseide to meet the minimum requirements of 10 houses per development site for award of a CIL payment.

This anticipated small size of development sites in Wyeseide, typical within rural communities, and the consequential inability to attract CIL funding, to address the lack of facilities across the five parishes, was considered to be a primary concern. Provision of reasonable leisure facilities was also considered to be a necessary prerequisite for

# Wyeside NDP 2011 – 2031: Consultation Statement

attracting young families into the area to address the age imbalance towards older age groups, and achieve a sustainable rural way of life.

It was also agreed at this meeting to pilot the “Planning for Real” methodology, and on 8 June 2014 The “Planning for Real” methodology using maps, flags and comment sheets was piloted at the Blakemere Fete. The lessons learned, were signed-off in NDP Steering Committee Meeting 11 June 2014. The flyer used for subsequent public events is set out in Figure 6 below.

**Information for You – Wyeside Neighbourhood Plan**

Since April 2012, local communities have been able to produce Neighbourhood Plans for their local area, putting in place planning policies for the future development and growth of their neighbourhood. A neighbourhood plan is a chance to say how the future development in terms of housing, transport, facilities and services, leisure and tourism, work and education and the environment should proceed in your neighbourhood, until 2031.

The Wyeside Neighbourhood Plan for Blakemere, Bredwardine, Moccas, Preston-on-Wye and Tyberton is to be produced in consultation with the residents of these areas. A Steering Group has been set up with local volunteers to facilitate and produce the Wyeside Parishes Neighbourhood Development Plan based on your input. A programme for a series of meetings, consultations and drop-in “Planning for Real” workshops is set out overleaf where you can raise points of interest. These will be included in a questionnaire for issue to each resident over 12 years of age. Questionnaire responses will be collated in a draft plan and independently reviewed for completeness. Subsequently, a referendum will be undertaken of the plan in the five communities.

A “yes” vote in support of the plan from in excess of 50% of people that vote will be required for the plan to be accepted.

Neighbourhood Development Plans can contain a variety of issues and policies which are most relevant to your parish. Your plan should be responsive to the needs and aspirations of your community, and are not required to be budgeted for the plan to be approved. They can include:

- Identification of sites for housing, including affordable housing;
- Provision of a settlement boundary;
- Provision for businesses to set up or expand in the parish;
- Provision of cycle ways and footpaths;
- Identification of sites for community use, e.g. schools, village halls, health centre, leisure facilities;
- Protection and creation of open space, green amenity areas, nature reserves, play areas;
- Protection of important local buildings and other historical assets;
- Promotion of renewable energy schemes and projects;
- Restrictions on the types of development or change of use;

**Q:** Why should I participate?

**A:** A neighbourhood plan is an opportunity to have a say in the future of where you live and work. Once approved it will become a statutory plan carrying equal weight to the Herefordshire Local Plan - Core Strategy and will be used in making decisions on planning applications in your area.

**Q:** Does this mean that a developer can build in the Wyeside parishes without recourse to the needs and aspirations of the community?

**A:** No. The Neighbourhood Plan is there to ensure that any developments support the sustainability of rural communities, their needs and aspirations and are consistent with maintaining the natural beauty of the countryside.

**Note:** The level of housing development is anticipated to be 12% of current stock over the period 2016-2031, which is roughly in line with historical growth rates. This amounts to around 35-40 new properties across the five Wyeside parishes.

**Current Schedule Milestones**

Drop in workshops:		
Moccas Fete	-	28 June 2014
Preston-on-Wye Fete	-	5 July 2014
Tyberton Barbecue	-	18 July 2014
Bredwardine Fete	-	2 August 2014
Issue Questionnaire	-	September/October 2014
Contact details for further information are:		
Blakemere	-	Ray Dudman 01981 500413
Brewardine	-	Andrew Head 01981 501024 ahlmgroad@gmail.com
Moccas	-	Martin Winrow 01981 501113 mwgmh@waitrose.com
Preston-on-Wye	-	John Dale 07773 010872 dockerdale@googlemail.com
Tyberton	-	Julie Williams 01981 500639 tyberton.court@virgin.net

**Figure 6 – “Planning for Real” Flyer and Programme of Open Days**

# Wyeside NDP 2011 – 2031: Consultation Statement

---

The “Planning for Real” flyer notice set out in Figure 6 above was published in the church magazines and on public notice boards.

## 2.6 The Younger Generation

At the NDP Steering Committee meeting held on 6 August 2014 concerns were raised regarding the lack of comments from the younger generation and the importance of having a representative age spread for the comments data.

Whilst it was recognised that this probably reflected the preponderance of older people within Wyeside, it was agreed that a “Planning for Real” team would attend the Young Farmers Club (YFC) barbecue event at Moccas on 26 August, to get a better understanding of the younger generation’s views. Their comments were included in the register of comments, and are set out in Appendix 1: Open Days – Public Comments and NDP Responses/Actions.

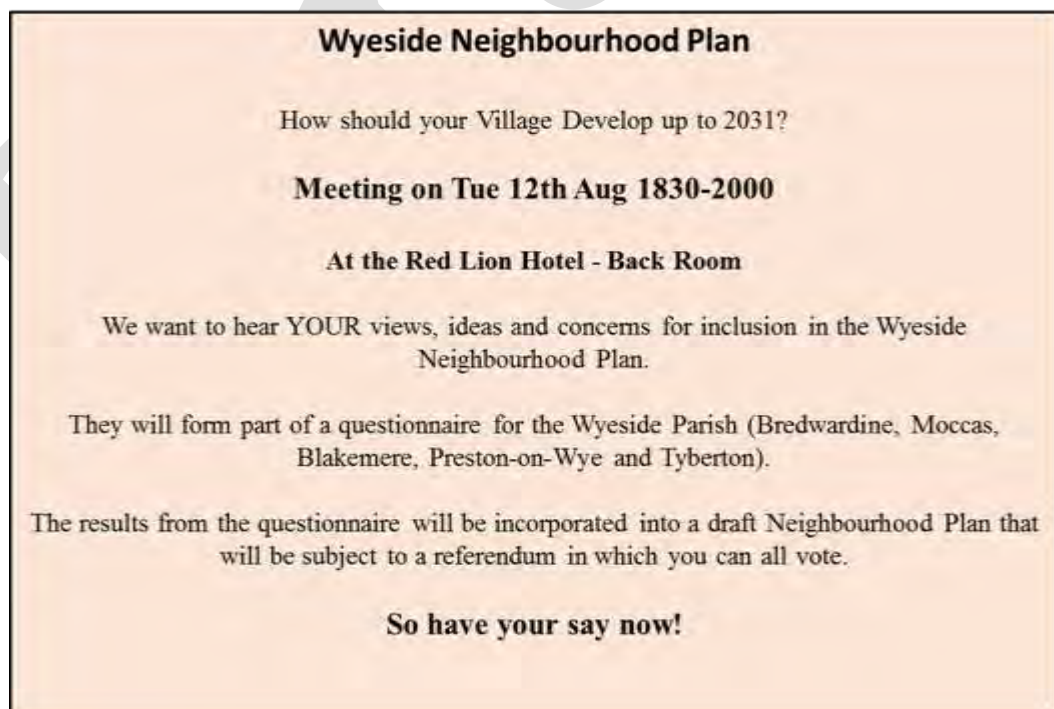
## 2.7 Wyeside Group of Parish Councils’ Role

A number of Steering Committee members were also parish councillors and progress reports were presented at every Wyeside Group parish councils’ meeting from commencement of the NDP process.

All of these parish meetings were, and are, open to the public. In addition, at each meeting there is a 10-minute session for members of the public to present a matter of their choice to the parish councils for discussion.

## 2.8 Prioritisation of Comments Received from Public Events

Following on from the Open Days two public meetings were held to discuss prioritisation of the comments. The first in the Red Lion Hotel, held on the 12 August 2014, is set out in Figure 7, below.



**Wyeside Neighbourhood Plan**

How should your Village Develop up to 2031?

**Meeting on Tue 12th Aug 1830-2000**

**At the Red Lion Hotel - Back Room**

We want to hear YOUR views, ideas and concerns for inclusion in the Wyeside Neighbourhood Plan.

They will form part of a questionnaire for the Wyeside Parish (Bredwardine, Moccas, Blakemere, Preston-on-Wye and Tyberton).

The results from the questionnaire will be incorporated into a draft Neighbourhood Plan that will be subject to a referendum in which you can all vote.

**So have your say now!**

**Figure 7 – Notice Board - Prioritisation Meeting at the Red Lion Hotel**

The second meeting was held in Moccas Village Hall on 10 September, and is set out in figures 8 and 9, overleaf.



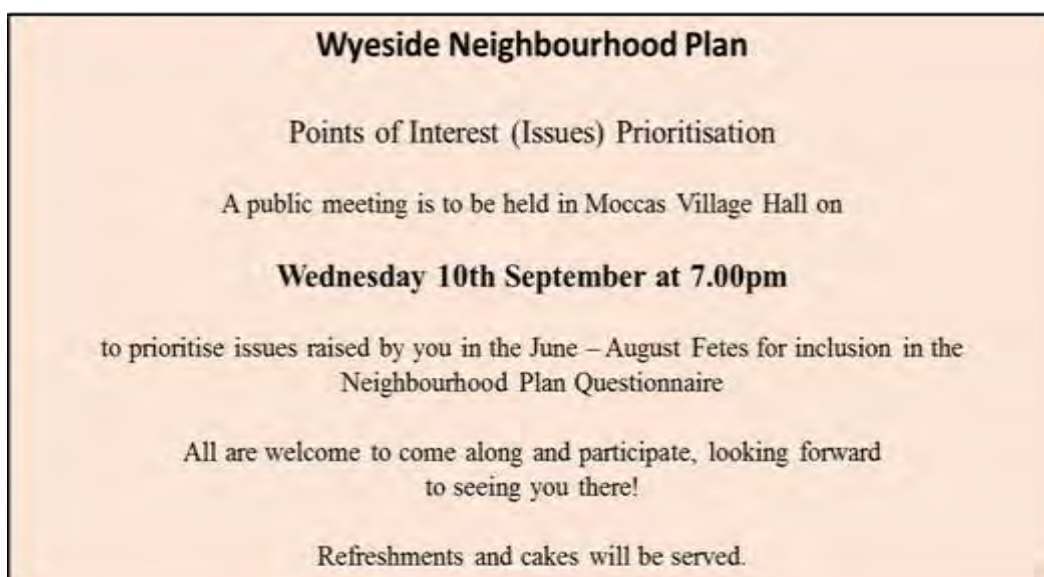


Figure 8 – Notice Board - Points of Interest Prioritisation, Moccas Village Hall

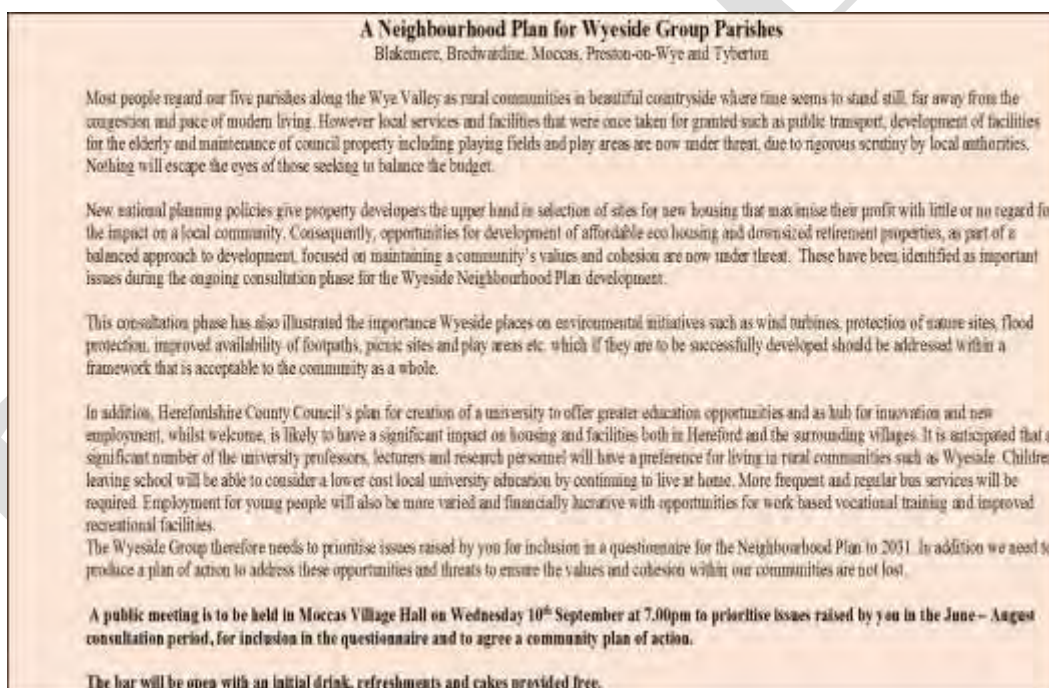


Figure 9 – Church Magazines - Points of Interest Prioritisation, Moccas Village Hall

## 2.9 Design of the Questionnaire

In the 27 August NDP Steering Committee meeting it was agreed that the questionnaire would be designed in-house without recourse to external consultants. The comments arising from the Open Days and prioritised in the meetings of 12 August and 10 September 2014, preparatory to design of the questionnaire, are set out in Appendix 1: Open Days – Public Comments and NDP Responses/Actions, and summarised in Section 3 – Open Days - Public Comments, below.



## 2.10 NDP Vision Statement

The draft vision statement tabled in the NDP Steering Committee Meeting held on 30 September 2014 was adopted for inclusion in the plan.

## 2.11 Questionnaire Sign-off, Circulation and Analysis

The 14 October 2014 Steering Committee meeting agreed final changes to the questionnaire design and publicity notices were placed in the next editions of the Link and Pump church magazines for the deadline of Wednesday 15 October 2014.

The 29 October 2014 Steering Committee meeting finalised the design of the questionnaire for distribution to the Wyeside community. Raffle tickets were also incorporated into the questionnaire format and prizes set out below, as an incentive, offered from a draw of completed responses:

Adult Prizes	1 <sup>st</sup> £100	2 <sup>nd</sup> £50	3 <sup>rd</sup> £25
Youth Prizes	1 <sup>st</sup> £50	2 <sup>nd</sup> £20	3 <sup>rd</sup> £10.

The circulation of questionnaires, including a brief explanatory note was hand delivered to every household within Wyeside, commencing Monday 3 November 2014, and were all collected by Friday 28 November 2014. The response rate exceeded 70%.

The analysis of questionnaire responses was completed early February 2015 and signed-off by the Steering Committee meeting, 11 February 2015.

The questionnaire analysis of responses is set out under separate cover in NDP 2011-2031: Consultation Addendum 1: Questionnaire, Analysis of Responses.

## 2.12 Draft Neighbourhood Development Plan (NDP)

Work on the draft NDP commenced end February 2015 and by the Steering Committee Meeting held on 27 January 2016 a draft version of the plan was considered to be sufficiently robust to not require review by independent planning consultants, subject to final comments from members of the Steering Committee. This version was taken forward preparatory to commencing the Regulation 14 Consultation process.

A copy of the draft NDP was issued to Hereford County (HC) NDP Planning Department for review and development of the Strategic Environment Assessment (SEA) and Habitat Regulations Assessment (HRA), preparatory to the 17 February Steering Committee Meeting.

The draft NDP for Regulation 14 Consultation was set up and configured on the Bredwardine and Brobury Website by the end March 2016 preparatory to commencing the Regulation 14 consultation process.

Final HRA and SEA documents were received from HC together with a recommended list of stakeholders to be contacted by 12 April 2016. The HRA required additional policy safeguards to restrict development close to the River Wye at Bredwardine. The plan was updated to reflect this requirement and the website was also updated.

The revised website page, a newsletter in the church magazines, and on public notice boards, for the Regulation 14 Consultation process was published, end April 2016, and is set out in Figure 10 overleaf.

**Wyeside Neighbourhood Plan**

Dear Parishioner,

This newsletter is to keep you updated with progress on the Wyeside Parishes (Blakemere, Bredwardine, Moccas, Preston-On-Wye and Tyberton) Neighbourhood Plan...and progress there most certainly has been! After a couple of years of public events, questionnaires and analyses and seemingly endless meetings, the draft plan is ready for public scrutiny and for you to make constructive comments. Have we got some of our 'facts' wrong? Have we missed anything of importance out (within the remit of the plan?) Even the odd spelling correction?

The Neighbourhood Plan is the result of your responses to the questionnaire returns from last summer. They have been very carefully analysed (you can see the analysis in the appendices of the plan) and interpreted within the vision statement of the steering committee:

*To ensure that the special characteristics of the villages within the five Parishes that residents know and love, including their rural feel, historic buildings and relationship with the surrounding countryside, are enhanced and protected.*

- To promote and encourage small businesses and employment for local people.*
- To recognise that modest change can be desirable when there is positive planning to support managed development of a type that is both sustainable and of an appropriate scale.*

The six-week public consultation period on the Draft Wyeside Group Parish Council Neighbourhood Plan will start on 16<sup>th</sup> May. **The document can be viewed** at and downloaded from <http://www.bredwardine-brobury.org.uk> as a .pdf file. Full colour paper copies will also be available for perusal in each of the village halls, in each village's church and at the Red Lion and Yew Tree pubs.

Black & white paper copies of the plan can be requested from Martin Winrow: 01981 501113 or email: [mwgmh@waitrose.com](mailto:mwgmh@waitrose.com)

Should you wish to question, comment on, feedback on or suggest improvements to the draft then please send them by email, to [jh.darbyshire@hotmail.com](mailto:jh.darbyshire@hotmail.com)

Alternatively, you can leave comments wherever full colour paper copies of the plan are on view.

The draft plan has also been sent to a number of bodies (e.g. the Environment Agency) for their comments and input.

As well as all these comments and suggestions, another major part of the public scrutiny process will be a **public meeting on Thursday 9<sup>th</sup> June at Moccas Village Hall**; 7.00pm for a 7.30pm start. This meeting is open for all Wyeside residents and the Steering Committee will try to answer any question you may have about the plan. There will be a presentation and refreshments will be served. Changes to the draft plan may well be made due to your feedback and will be updated online. **Finally, there will be a council-run, election-style day of voting** on whether or not to officially adopt the plan. If the majority of residents who turn out to vote wish to adopt the plan then it will be submitted to Herefordshire County Council for final approval and so let it become part of the planning laws for this area.

Please get involved: have a read through the document (you don't necessarily have to read every single page); send comments if you think they will help improve the plan; come to the public meeting and VOTE when the time comes (we will let you know 'when' closer to the event...HCC decides the exact day.)

Yours faithfully,

The Wyeside Parishes Neighbourhood Plan Steering Committee

**Figure 10 – Request to Wyeside residents to review the draft plan and comment**

Copies of the draft NDP, HRA and SEA documents were circulated to stakeholders via the Herefordshire County Council NDP Planning Team 15 May 2016.

### 2.13 **Regulation 14 Comments Register and Public Meeting**

Comments received from residents and stakeholders by email, and during the public meeting 9 June 2016 (attended by over 40 residents) were recorded in the Regulation 14 comments register and are summarised in, Section 5 – Regulation 14 Summary of Comments and Changes. All of the comments, responses and changes are set out chronologically in Appendix 2: Regulation 14 - Public Consultation with Stakeholders, Comments and NDP Responses/Actions.

Draft

## 3 Public Meetings/Open Days – Concerns/Issues

Some 300 comments were recorded in the comments register from the various public meetings and open days, during the summer of 2014 from a total estimated Wyeside population of c.550 people.

Note: The 393 individual responses to the questionnaire was estimated as representing c. 70% of the population, from which we can derive a total population of c.550 people.

The same core members of the Steering Committee were involved in all of the “Planning for Real” team open days at which the majority of these comments were collected, and were able to weed out the majority of comments being made by the same individuals at different events. However, some duplications would have been unavoidable. Even allowing for this within the analysis of comments it was clear that the same concerns were repeated over and over again by different people across all five parishes. These concerns are:

### 3.1 Affordable Housing and Employment

A significant proportion of the comments received, around 12%, were concerned with the need for affordable housing for local people, and to attract young families to address the imbalance of older people within the Wyeside communities. This requirement together with improvements in employment opportunities was seen as a necessary pre-requisite to ensure long-term sustainability of Wyeside’s rural way of life.

### 3.2 Environment and Size of Housing Developments

Residents value the rural landscape in which we live and want to see it protected for future generations. Therefore, housing developments must be sympathetic to maintaining the appearance and feel of local villages and the rural environment. Small scale developments were preferred to ensure they do not damage the cohesion of local communities.

### 3.3 Facilities and Services

The majority of comments were concerned with the lack of facilities and services and the risk for older local people of being unable to stay in the communities in which they have lived all their lives, due to a lack of local facilities and limited transport.

This is only a summary of the main issues arising from the public meetings and open days. To assess fully the implications of all of the issues raised it was considered necessary to respond to each of the c.300 comments in the register.

These comments are detailed on page 23, Appendix 1: Open Days – Public Comments and NDP Responses/Actions, below. Some valuable conclusions were drawn from the data and used for prioritisation of requirements in the design of the questionnaire.



## 4 Questionnaire Responses/Issues

The questionnaire was designed and structured to incorporate the subject matter from views expressed by residents in the public events and open days and enable analysis and conclusions to be formulated for input to the draft NDP. The questionnaire questions, responses and analysis is set out in, NDP 2011-2031: Consultation Addendum 1: Questionnaire, Analysis of Responses which is provided under separate cover.

A summary of comments and key issues is set out below:

### 4.1 Employment

Development of small businesses in the area would be welcomed to ensure the future vitality of the villages but larger developments are not considered suitable as Wyeside roads can't support the required volumes of the traffic and are probably too far from main roads and towns for them to be viable.

Residents are keen to see any new businesses set up in Wyeside that relate to agriculture and food production but do not rule out any others. Interestingly tourism was not seen as important as traditional employment opportunities, although Herefordshire earns more revenue from tourism than agriculture.

### 4.2 Housing

Most residents recognise the need for growth and change but want it to be slow and limited in nature, with small developments spread out over the 20 years of the plan, totalling about the 12% expansion proposed in the council core strategy.

There is a desire that new buildings should maintain the character and feel of the existing villages while recognising use of innovative, ecologically friendly building materials should not be ruled out.

#### Affordable Housing

There is a strong preference for local people to get priority for affordable housing, but it is recognised that there are severe economic and procedural obstructions to this occurring.

### 4.3 Environment

The majority of residents wish to preserve the rural character of our unique environment with an emphasis on protection of the environment, the historic buildings and monuments and the beautiful landscape that we enjoy.

### 4.4 Facilities

Residents recognised that our facilities are often poor and in some cases non-existent. Some improvement in facilities would be appreciated, whilst appreciating the economic constraints of providing and sustaining them.

### 4.5 Transport and Safety

Continued availability of current public transport services is a primary concern. In addition, the narrow, winding road network is considered to be a major constraint on further development and a concern for the safety of pedestrians, cyclists and other road users.

### 4.6 Key Issues

The key issues raised:

- What sizes of house should be built to facilitate young people getting their first house in Wyeside and making their life here?

## Wyeseide NDP 2011 – 2031: Consultation Statement

---

- How can “local people” afford their first house in Wyeseide so that they can continue to live here?
- How can we preserve our public transport in the current economic climate? Do we need creative ideas for alternatives to the classic bus service we have today?
- How can we support the introduction of innovative building materials whilst preserving the look and feel of a rural village?
- How do we encourage young people and families to move here to ensure a vibrant sustainable future for the area, as well as for those wishing to retire to our beautiful area?
- What types of housing or facilities are needed to achieve this, and how would facilities be funded?
- What services and facilities are needed to support our current ageing population who wish to stay within this area?
- What policies should go into the plan to address these issues and how can facilities be funded?

DRAFT

## 5 Regulation 14 Summary of Comments and Changes

A summary of comments and changes are set out below, in chronological order.

### 5.1 Bredwardine Parish Church and its Surroundings

Bredwardine with Brobury Parochial Church Council (the PCC) requested that Policy WH01 – New Housing Development, is amended to specifically exclude development in the orchards on either side of Church Lane this being the orchard referred to as ‘opposite the Red Lion’ and the orchard bordered by Church Lane, the River Wye and the road running from the Red Lion to Bredwardine Bridge.

In addition, the PCC also requested that there is specific protection of the iconic views of Bredwardine Bridge and the River Wye from the footpath running from the church to the bridge.

#### **Policy WH01 – New Housing Development**

**Deleted policy statement:** For the avoidance of doubt, where land on the opposite side of the road from a building designated as the centre of a village is a green space (no houses having been built in that location) no housing development will be allowed in that area. By way of example, this means no development will be allowed in the orchard opposite the Red Lion Hotel in the Bredwardine village centre, east of the B4352, or the green spaces between the orchard and the west bank of the river Wye;

**Additional policy statements:** Notwithstanding the requirement for development to take place contiguous to village centres, development is specifically excluded in the Bredwardine orchards on either side of Church Lane. This being the orchard ‘opposite the Red Lion’ village centre, and the orchard bordered by Church Lane, the River Wye and the road running from the Red Lion to Bredwardine Bridge.

In addition, the iconic views of Bredwardine Bridge and the River Wye from the footpath running through the orchard from the church to the bridge are protected from any form of development.

### 5.2 RIBA Best Practice Village Design

A Wyese resident attended the Royal Institute of British Architects (RIBA) 2016 exhibition in London and provided the Steering Committee team with information from the event.

RIBA recommends adoption of a “best practice” design approach using organic clusters of houses off new access lanes, with linked pathways to the rest of the village, to enable residents to maintain and develop communities within an environment that is physically connected.

Such an approach is feasible within the Wyese NDP policy of development contiguous to a village centre and has been adopted within the updated NDP. It replaces consideration of formal “cul-de-sacs”, slip roads and limited ribbon development for housing development sites of three houses or more.

### 5.3 Environment and Heritage

#### **Historic England**

We are supportive of both the content of the NDP document and the vision and objectives set out in it. The emphasis on the conservation of local distinctiveness and the protection of locally significant buildings and landscape character including archaeological remains and important views is to be applauded.

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.

## **Natural England**

“Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England does not have any specific comments on this draft neighbourhood plan.

## **Environment Agency**

It is important Rural Parishes at the NDP level offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period.

As stated within the Wyese plan the area of the five parishes is impacted by fluvial flooding from the River Wye (SAC) and its tributaries. We welcome Environmental Objective 7 and its associated Policy WE01 (Environmental Restrictions on Development).

Whilst we welcome reference to flood risk within the plan we would not, in the absence of specific sites allocated within areas of flooding, offer a bespoke comment at this time. You are advised to utilise the Environment Agency guidance and pro-forma once specific development sites are being considered, which should assist you moving forward with your Plan.

## **Dŵr Cymru Welsh Water (DCWW)**

Given that the Wyese Neighbourhood Plan (NP) has been prepared in accordance with the Adopted Herefordshire Local Plan Core Strategy, DCWW are supportive of the aims, objectives and policies set out.

We note that there is no specific reference to the capabilities of the public sewerage system or wastewater treatment works (WwTW) to accept the foul flows from the amount of new development proposed, other than the wording under (Section 6.5 of the April 2016 plan, Section 5.6 of the current September 2016 plan).

As such, we feel that the addition of the following policy (in line with Policy SD4 of the Core Strategy) would provide the assurance that new development will only be permitted where the capacity of the public sewerage network and/or WwTW allows.

Public sewerage network and wastewater treatment works (WwTW) New Policy –

“Development that may result in the capacity of the public sewerage network and/or the wastewater treatment works (WwTW) at Bredwardine, Moccas and Preston-on-Wye 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 improvements themselves via the provisions of the Water Industry Act (1991) and/or section 106 of the Town and Country Planning Act (1990).
- Outside of the three above listed settlements, there are no issues in providing a supply of clean water, though dependant on the location of development some level of off-site mains may be required. However, there is no public sewerage or wastewater



# Wyese NDP 2011 – 2031: Consultation Statement

---

treatment facilities. As such, any new housing growth in these locations will be required to utilise alternative drainage methods, under the provisions of Policy SD 4 of the Adopted Core Strategy.

Consequently, a new environment objective has been included in the plan:

Environment Objective 7 - Development that may result in the capacity of the public sewerage network and/or the wastewater treatment works (WwTW) becoming overloaded will not be permitted.

And a new policy added:

Policy WE05 – Development that may result in the capacity of the public sewerage network and/or the wastewater treatment works becoming overloaded at Bredwardine, Moccas and Preston-on-Wye 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 improvements themselves via the provisions of the Water Industry Act (1991) and/or section 106 of the Town and Country Planning Act (1990).
- Outside of the three settlements listed above, there are no issues in providing a supply of clean water, although dependant on the location of development some level of off-site mains may be required. However, there is no public sewerage or wastewater treatment facilities. As such, any new housing growth in these locations will be required to utilise alternative drainage methods, under the provisions of Policy SD 4 of the Adopted Core Strategy.

## 5.4 Spatial Strategy – Expansion of Village Centres Only

Wyese has adopted a criteria base approach with development contiguous to Village Centres. Some concerns were raised as to whether this approach would provide sufficient potential sites to meet development targets. In particular, having only one centre for the village of Moccas was considered to be too limiting. Consequently, for the purposes of housing developments, the village hall, and the village cross which includes Woodbury Lane, has been added to provide two village centres for the village of Moccas.

Careful on site analysis of each of the five villages has confirmed that the criteria based approach with development contiguous to Village Centres, offers significantly more development options than is required to meet growth requirements.

In addition, WH01 “contiguous to the village centre(s); i.e. using a spatial area of land, or field adjacent to a village centre, so as to not result in free standing, individual or groups of dwellings, which are obviously separate from village centres;” supports the variable spacing between houses within and across the settlements that are a key feature of the Wyese villages.

Settlement boundaries were rejected because they introduce increases in housing density over time, which could destroy the look and feel of the five villages, and would also be controversial to implement due to the scattered nature of housing in each of villages.

## 5.5 Affordable Housing

Herefordshire Council expressed a concern that limiting the number of houses to small development plots of five or less will make it difficult to obtain affordable housing contributions under national planning policy, which indicates that only sites of ten or

more dwellings must provide affordable housing. It will also make it less viable for developers to provide other contributions (s106) that could benefit the community.

Evidence from questionnaire responses substantiated the small development site sizes and is summarised in the plan at Appendix 4 - The Maximum Size (Number of Houses) of any one Development Site Acceptable by each Village. In addition, these sizes reflect historical supply and demand figures.

However, the need for affordable housing is a primary concern in Wyeside, so development site size preferences have been raised to ten houses or more for the two larger villages of Bredwardine and Preston-on-Wye, whilst maintaining the scale and feel of the village centres.

Consequently, Policy WH01 bullet 4, has been modified to comply with National Planning Policy Framework (NPPF) requirements for development sites of ten houses or more in the two larger villages to encourage development of affordable housing and receive contributions from developers for infrastructure. WH02 has also been updated to include affordable housing on development sites of ten dwellings or more. As it has been accepted that the requirement to provide affordable housing with small development plots is too restrictive.

### 5.6 **Tourism**

Following Herefordshire Council advice, promotion of cycling as a recreational tourism activity has been added, with possible routes identified, and supported by a new business objective in Section 6 – Facilities and Services:

Facilities Objective 5 – Promote Wyeside as a Tourist Attraction”

### 5.7 **Detailed Review of Comments and Responses/Actions**

This is only a summary of the main issues arising from the Regulation 14 Consultation process. A complete list of all comments, NDP responses and actions taken to update the plan following the consultation are set out in chronological order on page 66, Appendix 2 – Regulation 14 – Public Consultation with Stakeholders, Comments and NDP Responses/Actions.

**APPENDIX 1: OPEN DAYS – PUBLIC COMMENTS AND NDP RESPONSES/ACTIONS**

Draft

## Wyeside NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Affordable Housing but also flexibility for local people and businesses to build homes in places that allow family and workers to live in the community where they have grown up or work		Section 3 – Employment and Demographics, Section 4 – Housing (Affordable)	Included in plan	Policy WB01 – New Business Opportunities, WB02 – Retail Development, WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing.
Agrees with local development		Section 4 – Housing	Supports the plan	None
Housing – relaxed when told target number of houses c.39 across the five parishes up to 2031 – if the plan is adopted.		Section 4 – Housing (Size)	Supports the plan	None
Need to encourage young families with suitable homes and facilities – i.e. play area	Lack of youngsters for the future of the village	Section 4 – Housing/ Section 6 – Facilities and Services	Housing needs have been addressed in plan. Improvement in facilities outside scope of plan unless individual housing developments exceed 10 houses.	WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing
Not against development with local backing		Section 4 – Housing	Supports plan	None
No more Housing	Refused to give a reason	Section 4 – Housing	A “no” to more housing does not comply with National Planning Policy.	None
Affordable housing needs to be placed where there is public transport available otherwise it defeats the object		Section 6 – Facilities and Services and Section 4 – Housing (Affordable)	Public transport availability is outside the scope of the plan	Issue raised with the Wyeside Parish Councils
Build houses where the utilities are – sewage/water etc.		Section 5 – Environment and Heritage	There is a requirement to ensure that adequate or new sewage and water facilities exist before a new development can go ahead	Included in Policy WE01 Environment Restrictions on Development, Part 4
If more affordable housing is built, it should only be done if there is a realistic prospect of		Section 3 – Employment and Demographics and	Development of local business opportunities	Policy WB01 – New Business Opportunities,



## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
more jobs in the area (without commuting to Hereford)		Section 4 – Housing (affordable)	included in plan. Commuting to Hereford is not specifically excluded as there maybe circumstances where this would be acceptable.	WB02 – Retail Development, and WH03 – Affordable Housing.
Need better infrastructure if Bredwardine village is to absorb more houses. This should include improvements to the Bus service and a speed limit in the village.		Section 6 – Facilities and Services	A speed limit of 40mph is already in place in Bredwardine. Public Transport is outside the scope of the plan	Issue raised with Bredwardine Parish Council
No more Housing (Preston-on-Wye)	Village has no bus on regular basis & no infrastructure apart from excellent public house	Section 6 – Facilities and Services	There are 2 bus services a day going to Hereford from Preston-on-Wye	The plan is focused on land use and has no powers over availability of transport. Concern passed to Wyese parish council.
No new housing (Low cost) No use to younger people as no work nearby	There is not enough local demand for low cost housing we already have.	Section 3 – Employment and Demographics	This statement is not supported by other Public Event responses	Employment opportunities are encouraged within the plan and the importance of broadband availability identified.
Why build only in the village centre?	This makes for a split community when newcomers move in.	Section 4 - Housing (Location)	We are seeking to create critical mass within village centres to enable sustainability. Fragmented development encourages car travel and lack of contact. It is also contrary to Herefordshire core strategy and protection of green spaces.	Policy WH01 – New Housing Development explains how this will be implemented

## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Consideration to the whole village (parish area) as a whole not just the small central village area.		Section 4 - Housing (Location)	We are seeking to create critical mass within village centres to enable sustainability. Fragmented development encourages car travel and lack of contact. It is also contrary to Herefordshire core strategy and protection of green spaces.	Policy WH01 – New Housing Development explains how this will be implemented
Infill of houses please & affordable Housing		Section 4 - Housing (Affordable/Location)	Development is limited to village centres. The plan has been modified following consultation with the community to support infill for more than two house developments. Affordable housing encouraged.	Policy WH01 – New Housing Development explains how this will be implemented, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, and WH03 – Affordable Housing address these concerns.
New buildings should be near the main road (B4352)		Section 4 - Housing (Location)	The plan is criteria based and consequently supports development in many locations including village centres of four parishes near or on the B4352.	Policy WH01 – New Housing Development explains how this will be implemented
Outer village should not be taken as farmers just building everywhere		Section 4 - Housing (Location)	Housing developments are to be limited to village centres except where local employment and housing is needed within a farm community.	Policy WH01 – New Housing Development Policy WH05 – Housing in Open Countryside, explains how this will be implemented
“Affordable homes” are not affordable in the context of young rural people	Wages too low. But young farmers will still stay!! Help needed	Section 4 - Housing (Affordable)	The plan includes for rental of houses in addition to	WH02 – Ensuring an Appropriate Range of

## Wyeside NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
			housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
“Affordable homes” are not affordable to the average person in the area		Section 4 - Housing (Affordable)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
“Affordable Housing” is not affordable within the current definition (80% market price)	Only solution seems to be self-build	Section 4 - Housing (Affordable)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Affordable Housing for young people		Section 4 - Housing (Affordable)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.

## Wyeside NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
			for young farmers, reference policy WH05.	
Affordable Housing needed	Want to stay in area. Difficult to find a house	Section 4 - Housing (Affordable)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Affordable Housing needed in Wyeside parish		Section 4 - Housing (Affordable)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Affordable Housing to us is different to what high flying people would see as affordable		Section 4 - Housing (Affordable)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Housing for first time buyers needed in Moccas (and whole of Wyeside?)		Section 4 - Housing (Affordable)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in



# Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
			local workers. Special arrangements are also made for young farmers, reference policy WH05.	Open Countryside, address these concerns.
Housing for first time buyers needed in Tyberton		Section 4 - Housing (Affordable)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Housing for first time buyers wanted in Bredwardine		Section 4 - Housing (Affordable)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Housing for young people moving out from parents needed in Moccas		Section 4 - Housing (Affordable)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Lucky to get a house by age 40		Section 4 - Housing (Affordable)	The plan includes for rental of houses in addition to housing classed as affordable, although	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable

## Wyeside NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
			unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	Housing WH05 – Housing in Open Countryside, address these concerns.
Moccas needs houses for first time buyers		Section 4 - Housing (Affordable)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
More affordable Housing needed	Help Local people remain in the area	Section 4 - Housing (Affordable)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
People ‘retiring’ to the area are raising house prices and keeping locals out. Not sure how to rectify this.		Section 4 - Housing (Affordable)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Want houses for Local people	Don’t want to be dominated by incomers	Section 4 - Housing (Affordable/Priority)	The plan includes for rental of houses in addition to	WH02 – Ensuring an Appropriate Range of

## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
			housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Affordable Housing for people who have always been in the area.		Section 4 - Housing (Affordable/Priority)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Housing priority to Local people in Moccas		Section 4 - Housing (Affordable/Priority)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Housing priority to local people needed in Preston-on-Wye		Section 4 - Housing (Affordable/Priority)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.

## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Housing priority to local people needed in Wyese parish		Section 4 - Housing (Affordable/Priority)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Long term families which have been in the area should have some priority compared to people that just move in or intending on moving in		Section 4 - Housing (Affordable/Priority)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
My daughter had to leave Preston-on-Wye due to shortage of houses	Now buying in Clehonger but would love to move back to Preston	Section 4 - Housing (Affordable)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Prioritise local people for affordable Housing Thru all generations		Section 4 - Housing (Affordable)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.



## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
			for young farmers, reference policy WH05.	
Housing Association bungalows – for young families not treated as retirement homes		Section 4 - Housing (Affordable)	The plan includes for rental of houses in addition to housing classed as affordable, although unfortunately, these may be outside the means of many local workers. Special arrangements are also made for young farmers, reference policy WH05.	WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Extra time in town needed on buses. Service to continue indefinitely (from Preston-on-Wye)		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Extremely valuable service (Bus?) May it continue indefinitely		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Keep bus services		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Keeping a bus service going at least once a week with enough time in Hereford for shopping		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Maintain bus service 10:00 twice per week	Low vision, cannot drive Hospital visits £20 taxi fare each way	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
More frequent bus service wanted through Moccas	How can we attract young families to area without this facility?	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
More regular bus service to allow for times when own transport is unavailable as this does not always coincide with the present service		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council

## Wyeside NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Protect twice weekly bus service through Blakemere, Moccas, Preston-on-Wye		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Public transport to both Hay-on-Wye and Hereford is important to keep young people in the area		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
There are many elderly people or disabled unable to drive. Bus service is essential for their independence. We only get 2 buses weekly which stay in Hereford 2 hours		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Tyberton – More frequent bus service	Access to city for family members	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Against wind turbines but not against other sustainable energy;	Comments raised by many attendees	Section 5 - Environment and Heritage	Wyeside wind speeds too low to support wind farms. Borderline acceptable for single small wind turbines, which is encouraged	Included in Policy WE04 – Renewable Energy
All Poly Tunnels to include solar panels to offset visual blight		Section 5 - Environment & Heritage	Solar panel initiatives are encouraged in the plan.	Included in Policy WE04 – Renewable Energy
All sustainable environment development is 'inevitable'		Section 3 – Employment and Demographics, Section 4 - Housing and Section 5 - Environmental and Heritage	Sustainable and environmentally friendly housing development is a primary requirement of the plan	Supporting policies are mainly in Section 5 of the plan but also occur within Sections 3 and 4, as appropriate.
Check if Ground Heat schemes are possible in this area. If so encourage.		Section 5 - Environment and Heritage	Not specifically mentioned in the plan	Policy WE04 – Renewable Energy encourages all approaches.
In favour of sustainable environment – including wind turbines	Want to see area working together for young people and their future.	Section 5 - Environment and Heritage	Wyeside wind speeds too low to support wind farms. Borderline acceptable for single small wind turbines, which is encouraged	Included in Policies WE01, WE02, WE03 and WE04 – Renewable Energy

## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Investigate ground source heat opportunities in whole of Wyese parish		Section 5 - Environment and Heritage	Not specifically mentioned in the plan	Policy WE04 – Renewable Energy encourages all relevant approaches.
Make provision for electric cars in Moccas – best site would be the village hall car park	There are no charging points locally	Section 5 - Environment and Heritage	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Support renewable energy. Wind turbines in proportion to the landscape (smaller ones if available) Water Mills, Solar power, tidal schemes such as Severn Barrage		Section 5 - Environment and Heritage	Water mills and tidal schemes are not specifically mentioned in the plan	Policy WE04 – Renewable Energy encourages all relevant approaches.
I disagree (with No wind turbines comment above) – we need more sustainable energy owned/managed by local community	As a community we need to be more sustainable energy-wise	Section 5 - Environment and Heritage	Wyese wind speeds too low to support wind farms. Borderline acceptable for single small wind turbines, which is encouraged. Solar farms are encouraged where they meet environmental requirements	Policy WE04 – Renewable Energy encourages all relevant approaches.
Like the idea of wind turbines	Can take with you if you move. (Presumably this person referring to smaller models that are available?)	Section 5 - Environment and Heritage	Wyese wind speeds too low to support wind farms. Borderline acceptable for single small wind turbines, which is encouraged	Policy WE04 – Renewable Energy encourages all relevant approaches.
Lots of small scale wind turbines rather than a few big ones should be encouraged		Section 5 - Environment and Heritage	Wyese wind speeds too low to support wind farms. Borderline acceptable for single small wind turbines, which is encouraged	Policy WE04 – Renewable Energy encourages all relevant approaches.
No Wind Turbines	Unightly. Better options available. Noisy to those living nearby. (Have previously lived near one.)	Section 5 - Environment and Heritage	Wyese wind speeds too low to support wind farms. Borderline acceptable for single small wind turbines, which is encouraged	Policy WE04 – Renewable Energy encourages all relevant approaches.

## Wyeside NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
No wind turbines anywhere in Wyeside	No reason supplied	Section 5 - Environment and Heritage	Wyeside wind speeds too low to support wind farms. Borderline acceptable for single small wind turbines, which is encouraged	Policy WE04 – Renewable Energy encourages all relevant approaches.
Site for Wind energy suggested on Dorstone Hill above Westonhill Wood	(This area is in Dorstone Parish so needs to be passed to them)	Section 5 - Environment and Heritage	Outside the Wyeside parishes boundaries	None
Wind energy site wanted in Moccas (and whole of Wyeside?) (No specific site identified)		Section 5 - Environment and Heritage	Wyeside wind speeds too low to support wind farms. Borderline acceptable for single small wind turbines, which is encouraged	Policy WE04 – Renewable Energy encourages all relevant approaches.
Wind energy site wanted on Woodbury hill	This is area is predominantly in the parish of Dorstone.	Section 5 - Environment and Heritage	Wyeside wind speeds too low to support wind farms. Borderline acceptable for single small wind turbines, which is encouraged. This area is predominantly outside the Wyeside parishes boundaries.	None
Wind turbines ( of a community nature better)	Energy sustainability	Section 5 - Environment and Heritage	Wyeside wind speeds too low to support wind farms. Borderline acceptable for single small wind turbines, which is encouraged.	Policy WE04 – Renewable Energy encourages all relevant approaches.
Wind turbines community scheme on Bredwardine hill – What size?	Locate within Bredwardine parish. Number of possible sites?	Section 5 - Environment and Heritage	Wyeside wind speeds too low to support wind farms. Borderline acceptable for single small wind turbines, which is encouraged.	Policy WE04 – Renewable Energy encourages all relevant approaches.
Woodbury Hill – green parkland. – Ideal site for windmills	Community owned sustainable energy	Section 5 - Environment and Heritage	Not within Wyeside parishes boundaries. Wyeside wind speeds too low to support	Policy WE04 – Renewable Energy encourages all relevant approaches.



## Wyeside NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
			wind farms. Borderline acceptable for single small wind turbines, which is encouraged.	
Create areas of natural/wild planting in Wyeside parish (No specific sites identified)		Section 5 - Environment and Heritage	Natural and wild planting is encouraged in the plan.	Policy WE02 – Landscape Design Principles and Policy WE03 - Protecting Local Green Spaces and Important Views
Create areas of natural/wild planting on Woodbury hill	This is technically in Dorstone Parish.	Section 5 - Environment and Heritage	Not within Wyeside parishes boundaries.	None
Don't want to spoil the environment so be careful (with developments)		Section 5 - Environment and Heritage	Plan provides protection for the environment and encourages enhancements	Policies WE01, WE02, WE03 and WE04 specifically.
Historic Sites and Megalith stones not currently recorded	These need to be protected	Section 4 – Housing and Section 5 - Environment and Heritage	Housing developments limited to village centres to encourage sustainable communities. Historic sites outside of village centres will not be subject to development.	Policy WH01 – New Housing Development, constrains development to village centres. Policy WE03 Protects Local Green Spaces and Important Views
I cannot see any benefits from allowing farmland to flood unless specific wetland environments want to be created.		Section 5 - Environment and Heritage	The Wye Valley fluvial flood plains (which are also used for farming) are protected under Special Area of conservation (SAC) regulations and by Natural England.	Policy WE01 – Environmental Restrictions on Development, complies with these requirements.
Land owners should be assisted to maintain environmental features or create new ones.		Section 5 - Environment and Heritage	Budgetary issue outside the scope of the plan	None
Meadows have been lost all over the country. Can we make sure that Preston-on-Wye has some areas managed for wild flowers		Section 5 - Environment and Heritage	Encouraged	Policy WE02 – Landscapes Design Principles

## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Nature area/reserve to be created (Tag placed in field next to Moccas Village hall)		Section 5 - Environment and Heritage	Budgetary/ownership issue outside of the scope of the plan.	None
Nature area/reserve to be created by Bredwardine bridge		Section 4 - Housing and Section 5 - Environment and Heritage	Green space alongside Bredwardine Bridge is protected from any development.	Policy WH01 – New Housing Development
Nature area/reserve to be created in Moccas (No specific site identified)		Section 5 - Environment and Heritage	Budgetary/ownership issue outside of the scope of the plan.	None
Nature trail to be created in Moccas Deer park around the Lawn pool	Three requests	Section 5 - Environment and Heritage	Budgetary/ownership issue outside of the scope of the plan.	None
No Poly tunnels in Moccas	They are ugly	Section 5 - Environment and Heritage	Will need to be supported by a majority of the community	None
Orchards, old ones, to be protected		Section 5 - Environment and Heritage	Housing developments limited to village centres to encourage sustainable communities.	Policy WH01 – New Housing Development, constrains development to village centres. Policy WE03 Protects Local Green Spaces and Important Views
Pond at bend below Moccas church to be enhanced		Section 5 - Environment and Heritage	Budgetary/ownership issue outside of the scope of the plan.	None
Pond to be enhanced at Moccas Hall (Junction with road to Church)		Section 5 - Environment and Heritage	Budgetary/ownership issue outside of the scope of the plan.	None
Protect ancient orchard on south side of Hacton Lane opposite Lower House in Preston	Many old varieties of Apple grown here.	Section 5 - Environment and Heritage	Housing developments limited to village centres to encourage sustainable communities.	Policy WH01 – New Housing Development, constrains development to village centres. Policy WE03 Protects Local Green Spaces and Important Views
Protect ancient trees in orchard in Moccas, North-West of Moccas cross		Section 5 - Environment and Heritage	Housing developments limited to village centres to	Policy WH01 – New Housing Development, constrains

## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
			encourage sustainable communities.	development to village centres. Policy WE03 Protecting Local Green Spaces and Important Views
Protect Hedgerows		Section 5 - Environment and Heritage	Included in plan	Policy WE03 - Protecting Local Green Spaces and Important Views
Protection orders needed on all very old trees		Section 5 - Environment and Heritage	Included in plan	Policy WE03 - Protecting Local Green Spaces and Important Views
Rare species (Great Crested Newts and other Newt species) at Old house Bredwardine so any developments here would have to respect this.		Section 5 - Environment and Heritage	Already protected under national planning regulations, however housing developments in the plan are limited to village centres to encourage sustainable communities.	Policy WH01 – New Housing Development - constrains development to village centres. Policy - WE03 Protects Local Green Spaces and Important Views
Trees to be kept in the whole of Moccas		Section 5 - Environment and Heritage, Section 4 - Housing	Protection included in the plan	Policy WE03 - Protects Local Green Spaces and Important Views. Policy WH01 – New Housing Development also provides for retention of trees
Wildflower meadow wanted here (Tag placed in existing orchard opposite Deer Park Close currently used to graze sheep)		Section 5 - Environment and Heritage	Budgetary/ownership issue outside of the scope of the plan	None
Wildlife area at Merbach needs to be improved	This area is in Dorstone Parish	Section 5 - Environment and Heritage	Outside the boundaries of Wyese parishes	None
Wildlife area to be improved (Tag placed in field next to Moccas Village hall)		Section 5 - Environment and Heritage	Budgetary/ownership issue outside of the scope of the plan	None
Wildlife area to be improved round pond below Moccas church		Section 5 - Environment and Heritage	Budgetary/ownership issue outside of the scope of the plan	None

## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Community garden with seating	For people to sit and chat	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Create an amenity space in field behind war memorial at Bredwardine		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Create an outdoor fitness trail in field behind war memorial at Bredwardine		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Facilities for boating down the river (e.g. Bredwardine to Preston-on-Wye)	Tourist development for employment	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Health and Safety issues have prevented lake use for local community (Wood field for residents)		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Include activities for older children in field behind war memorial at Bredwardine		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Internet/cyber café wanted in Moccas		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Keep Community facilities including Moccas Cricket Pitch		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Mountain bike trail wanted in Blakemere Hill Wood		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Need to form/keep local clubs/associations – attractive to all ages (Rifle club – recently retired member)	Social basis for local people	Section 6 – Facilities and Services	Community self-help issue	None
New amenity space vital in Bredwardine. Perhaps in field behind War memorial. Perhaps new village hall in same area.	Nothing exists at the moment. Village hall could be enhanced & will soon need a new lease	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council

## Wyeside NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Children's play facilities and fitness trail in same area.				
Picnic area wanted beside footpath at Bredwardine bridge	This will formalise what is already happening and damaging grazing/hay field	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Picnic site by river	River is SSSI/SAC, Health and Safety issues. Formalized area would be good	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Play area and nature reserve next Moccas Village hall (Relates to tags noted above)	Moccas is lacking in facilities for children, as in there is nothing!	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Play area. There is a local play worker to supervise and run sessions	Will make Moccas a more attractive place to live	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Play place for younger children and activity area for older children in Bredwardine	A community place for children to socialize. None available at the moment.	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Playground and Playing field wanted	Keep children from playing on the road	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Protect Moccas Village Green at Moccas Cross		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Provide play space for younger children in field behind war memorial at Bredwardine		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Provide recycling facilities (Tag placed near Moccas Village hall – area was crowded with tags!)		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Recreational facilities wanted near the river Wye	For family use	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council



## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Upgrade Tennis courts in Preston-on-Wye: Line repainted, Re-surfaced, New net, toilet needed.		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Want to revitalise Bredwardine village and bring in younger families. This will require adequate facilities to attract them.		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Woodbury hill is currently being put back to open parkland	Need to open spaces for all adjoining the Deer Park	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Young child play area, nature area, additional seating, youth activities at Moccas Village hall. Wildlife area near hall (These relate to the tags noted above)	I have a young child	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Youth activity clubs/provision needed here (Tag placed in field next to Moccas Village hall)		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Youth Club wanted		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Most important thing for bringing in small business is a decent internet connection		Section 3 – Employment and Demographics (Broadband)	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
To encourage young families to the area we need very fast broadband (fibre optic) for internet connection. Without it people will be reluctant to settle here		Section 3 – Employment and Demographics (Broadband)	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
A Social Club/Nursing Home for the elderly		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Care home for the old people		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council

## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Alter church (No site stated but could be Tyberton or Blakemere?)	No community hall in village	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Blakemere Church (part of) to become a Community Centre (Already in progress)	No Village Hall	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Community centre wanted in field behind Bredwardine War Memorial		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Community centres needed		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Cycle racks at Village Halls		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Don't agree with conversion of Blakemere church.		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Facility to tie up dogs at Village Halls		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Improve parking by creating more bays (Tag placed near Moccas Village hall)		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
New village hall in field behind war memorial at Bredwardine		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Re-ordering of Blakemere church to cater for community meeting etc. (Tag placed on trackway going SW from village green?)	No Village Hall	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Seating area wanted here (Tag placed near Moccas Village hall)		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council

## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Use churches as Community Centre for all ages	Keep children from playing on the road	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
A local shop in Moccas	Will make Moccas a more attractive place to live	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Keep local pubs going	Provide social life and employment in the villages	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Local shop to supply locals and tourists. Could be part time or volunteer		Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Need local facilities, post office and stores	Facilities only accessible by car	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Support of local pub	Retain facilities	Section 6 - Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
A few roads and fields will flood	Can be a problem in winter	Section 5 - Environment and Heritage	Parish Council issue	Issue raised with Parish Council
Flooding from Lower Blakemere Farm to Tyberton (Should be to Preston)		Section 5 - Environment and Heritage	Parish Council issue	Issue raised with Parish Council
Flooding issue on road at Lilla Pool between Moccas and Bredwardine	Flooded about 10cm deep last winter	Section 5 - Environment and Heritage	Parish Council issue	Issue raised with Parish Council
Flooding issues between Newcourt Farm and The Mill at Preston-on-Wye		Section 5 - Environment and Heritage	Parish Council issue	Issue raised with Parish Council
Flooding issues here prevent development (Tag placed in Moccas field between Highbury and orchard cottages)	Field floods every winter due low point in ground and water table rising in subsoil	Section 5 - Environment and Heritage	Parish Council issue	Issue raised with Parish Council
Flooding issues on Moccas to Preston road just before the road meets the river at Bycross, coming from Moccas		Section 5 - Environment and Heritage	Parish Council issue	Issue raised with Parish Council

## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Flooding on road and in field opposite track to Kinley Farm on road from Blakemere to Moccas		Section 5 - Environment and Heritage	Parish Council issue	Issue raised with Parish Council
Flooding risk in fields north of road from Lower Moccas Farm to Bycross.		Section 5 - Environment and Heritage	Parish Council issue	Issue raised with Parish Council
Flooding. We need to make sure that one road in and out of the village (Preston-on-Wye) is made flood proof even if we have to accept flooding on the others		Section 5 - Environment and Heritage	Parish Council issue	Issue raised with Parish Council
Allotments required here (Tag placed near Moccas village hall)		Section 5 - Environment and Heritage	Parish Council issue	Issue raised with Parish Council
Allotments required in field SE of sharp bend in road approaching Rose cottages in Moccas	Twice	Section 5 - Environment and Heritage	Parish Council issue	Issue raised with Parish Council
Allotments wanted behind Moccas Forge		Section 5 - Environment and Heritage	Parish Council issue	Issue raised with Parish Council
Community Composting	Travelling to Hereford ridiculous	Section 5 - Environment and Heritage	Parish Council issue	Issue raised with Parish Council
Community Composting wanted at Moccas Hall		Section 5 - Environment & Heritage	Parish Council issue	Issue raised with Parish Council
Community composting wanted in field SE of sharp bend in road approaching Rose cottages in Moccas		Section 5 - Environment and Heritage	Parish Council issue	Issue raised with Parish Council
Community orchard to be created (Tag placed in existing orchard beside Brick Kiln wood)	Concerned that orchard is preserved when the existing user (Colin) gives up. (I understand it is already owned by a trust so need to talk to them) Two comments	Section 5 - Environment and Heritage	Parish Council issue	Issue raised with Parish Council
Community vegetable garden wanted in field SE of sharp bend in road approaching Rose cottages in Moccas	Two comments	Section 5 - Environment and Heritage	Parish Council issue	Issue raised with Parish Council
Compost place in Preston (or around) for grass cuttings	So not have to drive to Hereford to compost our grass cuttings – Waste of energy	Section 5 - Environment and Heritage	Parish Council issue	Issue raised with Parish Council
NHS Remote monitoring facilities	To limit travel and stays at hospitals, reduce NHS costs	Section 6 – Facilities and Services	Parish Council issue	Issue raised with Parish Council

## Wyeside NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Affordable Housing but also flexibility for local people and businesses to build homes in places that allow family and workers to live in the community where they have grown up or work		Section 3 – Employment and Demographics, Section 4 – Housing (Affordable)	Included in plan	Policy WB01 – New Business Opportunities, WB02 – Retail Development, WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing.
Agrees with local development		Section 4 – Housing	Supports the plan	None
Housing – relaxed when told target number of houses c.39 across the five parishes up to 2031 – if the plan is adopted.		Section 4 – Housing (Size)	Supports the plan	None
Need to encourage young families with suitable homes and facilities – i.e. play area	Lack of youngsters for the future of the village	Section 4 – Housing/ Section 6 – Facilities and Services	Housing needs have been addressed in plan. Improvement in facilities outside scope of plan unless individual housing developments exceed 10 houses.	WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing
Not against development with local backing		Section 4 – Housing	Supports plan	None
No more Housing	Refused to give a reason	Section 4 – Housing	A “no” to more housing does not comply with National Planning Policy.	None
Affordable housing needs to be placed where there is public transport available otherwise it defeats the object		Section 6 – Facilities and Services and Section 4 – Housing (Affordable)	Public transport availability is outside the scope of the plan	Issue raised with the Wyeside Parish Councils
Build houses where the utilities are – sewage/water etc.		Section 5 – Environment and Heritage	There is a requirement to ensure that adequate or new sewage and water facilities exist before a new development can go ahead	Included in Policy WE01 Environment Restrictions on Development, Part 4



## Wyeside NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
If more affordable housing is built, it should only be done if there is a realistic prospect of more jobs in the area (without commuting to Hereford)		Section 3 – Employment and Demographics and Section 4 – Housing	Development of local business opportunities included in plan. Commuting to Hereford is not specifically excluded as there maybe circumstances where this would be acceptable.	Policy WB01 – New Business Opportunities, WB02 – Retail Development, and WH03 – Affordable Housing.
Need better infrastructure if Bredwardine village is to absorb more houses. This should include improvements to the Bus service and a speed limit in the village.		Section 6 – Facilities and Services	A speed limit of 40mph is already in place. Public Transport is outside the scope of the plan	Issue raised with Bredwardine Parish Council
No more Housing (Preston-on-Wye)	Village has no bus on regular basis & no infrastructure apart from excellent public house	Section 6 – Facilities and Services	There are 2 bus services a day going to Hereford from Preston-on-Wye	The plan is focused on land use and has no powers over availability of transport. Concern passed to Wyeside parish council.
No new housing (Low cost) No use to younger people as no work nearby	There is not enough local demand for low cost housing we already have.	Section 3 – Employment and Demographics	This statement is not supported by other Public Event responses	Employment opportunities are encouraged within the plan and the importance of broadband availability identified.
Why build only in the village centre?	This makes for a split community when newcomers move in.	Section 4 - Housing (Location)	We are seeking to create critical mass within village centres to enable sustainability. Fragmented development encourages car travel and lack of contact. It is also contrary to Herefordshire core strategy and protection of green spaces.	Policy WH01 – New Housing Development explains how this will be implemented

## Wyeside NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Consideration to the whole village (parish area) as a whole not just the small central village area.		Section 4 - Housing (Location)	We are seeking to create critical mass within village centres to enable sustainability. Fragmented development encourages car travel and lack of contact. It is also contrary to Herefordshire core strategy and protection of green spaces.	Policy WH01 – New Housing Development explains how this will be implemented
Infill of houses please & affordable Housing		Section 4 - Housing (Affordable/Location)	Development is limited to village centres. The plan has been modified following consultation with the community to support infill for more than two house developments. Affordable housing encouraged.	Policy WH01 – New Housing Development explains how this will be implemented, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, and WH03 – Affordable Housing address these concerns.
New buildings should be near the main road (B4352)		Section 4 - Housing (Location)	The plan is criteria based and consequently supports development in many locations including village centres of four parishes near or on the B4352.	Policy WH01 – New Housing Development explains how this will be implemented
Outer village should not be taken as farmers just building everywhere		Section 4 - Housing (Location)	Housing developments are to be limited to village centres except where local employment and housing is needed within a farm community.	Policy WH01 – New Housing Development Policy WH05 – Housing in Open Countryside, explains how this will be implemented
No development on wetland	58 birds on patch of land	Section 4 - Housing (Restriction)	Restrictions included in the plan to limit housing	Policy WH01 – New Housing Development, and WE01 –

## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
			developments to village centres to support community sustainability and protect green spaces, supported by environmental restrictions on development.	Environmental Restrictions on Development.
Affordable Housing needed here (Tag placed halfway between “The Elms” and next building towards Preston on road coming from Moccas)		Section 4 - Housing (Affordable/Location)	Plan is criteria based which means that numerous sites can be developed close to village centres, but there are no specific sites allocated, reference policy WH01. Affordable homes and rental are also included.	Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Affordable Housing required here (Tag placed in field SE of sharp bend in road approaching Rose cottages in Moccas)		Section 4 - Housing (Affordable/Location)	Plan is criteria based which means that numerous sites can be developed close to village centres, but there are no specific sites allocated, reference policy WH01. Affordable homes and rental are also included.	Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Build Eco homes in field between Moccas church and the access road in (in the cup formed by “u” bend in road)		Section 4 - Housing (Location)	Plan is criteria based which means that numerous sites can be developed close to village centres, but there are no specific sites allocated.	Policy WH01 – New Housing Development.
Development possible near to Woodfield?		Section 4 - Housing (Location)	Plan is criteria based which means that numerous sites can be developed close to village centres, but there are no specific sites allocated.	Policy WH01 – New Housing Development.

## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
House build option for Bredwardine in Claypits field for 2 houses		Section 4 - Housing (Size/Location)	Plan is criteria based which means that numerous sites can be developed close to village centres, but there are no specific sites allocated.	Policy WH01 – New Housing Development.
Housing for families needed (Tag placed in field NE of Moccas cross)		Section 4 - Housing (Location)	Plan is criteria based which means that numerous sites can be developed close to village centres, but there are no specific sites allocated, reference policy WH01. Affordable homes and rental are also included.	Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Live/work units wanted at or by Moccas court		Section 4 - Housing (Location)	Plan is criteria based which means that numerous sites can be developed close to village centres, but there are no specific sites allocated, reference policy WH01. Affordable homes and rental are also included.	Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Potential Housing side in field west of Bredwardine between existing houses and Mildew Lodge		Section 4 - Housing (Location)	Plan is criteria based which means that numerous sites can be developed close to village centres, but there are no specific sites allocated.	Policy WH01 – New Housing Development.
Potential Housing site (Tag placed in vacant lot opposite Greystoke in Moccas)		Section 4 - Housing (Location)	Plan is criteria based which means that numerous sites can be developed close to village centres, but there are no specific sites allocated.	Policy WH01 – New Housing Development.
Want about 4 houses in Moccas in field north east of Peak Cottage. Scattered developments after that around the village		Section 4 - Housing (Size/Location)	Plan is criteria based which means that numerous sites can be developed close to	Policy WH01 – New Housing Development.

## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
			village centres, but there are no specific sites allocated.	
Avoid major developments	(No reason noted)	Section 4 - Housing (Site Size)	The size of individual developments is required to be of a scale that matches the size of village centres	Policy WH01 – New Housing Development.
Build more houses in moderation		Section 4 - Housing (Site Size)	The size of individual developments is required to be of a scale that matches the size of village centres	Policy WH01 – New Housing Development.
Don't want huge blocks of houses.	Preserve existing character of village and give time for new people to integrate with existing villagers	Section 4 - Housing (Site Size)	The size of individual developments is required to be of a scale that matches the size of village centres	Policy WH01 – New Housing Development.
Growth of Bredwardine welcomed but should be individual builds or very small developments spread around the village.		Section 4 - Housing (Site Size)	The size of individual developments is required to be of a scale that matches the size of village centres	Policy WH01 – New Housing Development.
Housing – Keep to a minimum, in style		Section 4 - Housing (Style)	New house styles are required to fit in with those surrounding it.	Policy WHD01 – New Building Design.
Not over expanding the village as having a huge village lowers the community		Section 4 - Housing (Site Size)	The size of individual developments is required to be of a scale that matches the size of village centres	Policy WH01 – New Housing Development.
Small developments only		Section 4 - Housing (Site Size)	The size of individual developments is required to be of a scale that matches the size of village centres	Policy WH01 – New Housing Development.
Housing developments are good. Should be tucked in with other houses	Good for the Community	Section 4 - Housing (Site Size)	The size of individual developments is required to be of a scale that matches the size of village centres	Policy WH01 – New Housing Development.
Some houses needed in small groups		Section 4 - Housing (Size)	The size of individual developments is required to be of a scale that matches the size of village centres	Policy WH01 – New Housing Development.



## Wyeseide NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
All possible means for reducing energy in any new builds and upgrades	We are energy short – better environments, that reduces costs.	Section 4 - Housing (Environment)	Environmentally friendly designs are encouraged in addition to building regulations.	Policy WHD01 – New Building Design.
Better insulation on all new houses	Energy sustainability	Section 4 - Housing (Environment)	Environmentally friendly designs are encouraged in addition to building regulations.	Policy WHD01 – New Building Design.
Country looking houses wanted		Section 4 - Housing (Style)	New house styles are required to fit in with those surrounding it.	Policy WHD01 – New Building Design.
Energy efficient Housing needed in Wyeseide parish		Section 4 - Housing (Environment)	Environmentally friendly designs are encouraged in addition to building regulations.	Policy WHD01 – New Building Design.
Ensure green roofs on buildings in Wyeseide parish	Two occurrences	Section 4 - Housing (Environment)	Environmentally friendly designs are encouraged in addition to building regulations.	Policy WHD01 – New Building Design.
Good all round Housing design required in Wyeseide parish		Section 4 - Housing (Style/Environment)	New house styles are required to fit in with those surrounding it.	Policy WHD01 – New Building Design.
Green roofs, good insulation, Solar panels (Electric & hot water), Water butts & Grey water reuse on all new properties and all major refurbishments of existing properties, unless they affect architectural heritage of very old properties.	Better energy sustainability	Section 4 - Housing (Environment)	Environmentally friendly designs are encouraged in addition to building regulations.	Policy WHD01 – New Building Design.
Housing – It has to match the style of the villages. Tyberton = Red Brick		Section 4 - Housing (Style)	New house styles are required to fit in with those surrounding it.	Policy WHD01 – New Building Design.
In Moccas it would be nice to have 4 or 5 houses built in one area than a few others dotted around.		Section 4 - Housing (Size)	The size of individual developments is required to be of a scale that matches the size of village centres	Policy WH01 – New Housing Development.
Incorporate rain water recycling (tag placed at Vine cottage near Moccas Village hall)		Section 4 - Housing (Environment)	Environmentally friendly designs are encouraged in	Policy WHD01 – New Building Design.

## Wyeside NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
			addition to building regulations.	
Incorporate renewable energy sources in new developments in whole Wyeside parish	Two comments	Section 4 - Housing (Environment)	Environmentally friendly designs are encouraged in addition to building regulations.	Policy WHD01 – New Building Design.
New houses to be Eco homes, including Water butts & Grey Water reuse		Section 4 - Housing (Environment)	Environmentally friendly designs are encouraged in addition to building regulations.	Policy WHD01 – New Building Design.
Not modern houses, country homes		Section 4 - Housing (Style)	New house styles are required to fit in with those surrounding it.	Policy WHD01 – New Building Design.
Orient houses so they gain maximum light and heat from sun in Wyeside parish		Section 4 - Housing (Environment)	Environmentally friendly designs are encouraged in addition to building regulations.	Policy WHD01 – New Building Design.
Photo Voltaic cells on all new houses	Energy sustainability	Section 4 - Housing (Environment)	Environmentally friendly designs are encouraged in addition to building regulations.	Policy WHD01 – New Building Design.
Rainwater harvesting & Biomass boilers on all new buildings		Section 4 - Housing (Environment)	Environmentally friendly designs are encouraged in addition to building regulations.	Policy WHD01 – New Building Design.
Want each new house being energy creating		Section 4 - Housing (Environment)	Environmentally friendly designs are encouraged in addition to building regulations.	Policy WHD01 – New Building Design.
Approve of Live/work units. Ones that generate noise should be built where they do not affect existing houses.		Section 3 – Employment and Demographics and Section 4 - Housing	Included in plan, noise restricted.	Policy WB01- New Business Opportunities, WB02 – Retail Development
ECO homes, high quality downsizing bungalows	For people wanting to downsize and still live in the area	Section 4 - Housing (Environment)	Environmentally friendly designs are encouraged in addition to building regulations.	Policy WHD01 – New Building Design. WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses.

# Wyeside NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Just more housing for buyer in Tyberton		Section 4 – Housing	Encouraged in plan with many options for building properties in each of the five villages.	Policy WH01 – New Housing Development.
Live work units needed in Moccas (and whole of Wyeside?)		Section 3 – Employment and Demographics and Section 4 - Housing	Encouraged in plan.	Section 3, Policy WB01- New Business Opportunities, WB02 – Retail Development. Section 4, Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
More family housing wanted		Section 4 - Housing (Affordable)	Encouraged in the plan.	Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Need for live/work units, affordable homes for local younger generation. Down-sizing homes & up-sizing houses needed.	Provide work and homes for the working age population that will keep a shop/pub & community spirit	Section 3 – Employment and Demographics and Section 4 – Housing (Affordable)	Encouraged in plan.	Section 3, Policy WB01- New Business Opportunities, WB02 – Retail Development. Section 4, Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of

## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
				Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Need retirement Housing, e.g. high quality bungalows, for those still independent wishing to downsize		Section 4 - Housing	Encouraged in the plan	Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses
Retirement homes for people to move from larger houses & stay in the area.	Up to 3 families would like to downsize and stay in the Bredwardine area.	Section 4 - Housing	Encouraged in plan	Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses
Retirement homes wanted in Bredwardine		Section 4 - Housing	Encouraged in plan	Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses
Shared Equity Housing wanted in Bredwardine		Section 4 - Housing (Affordable)	Encouraged in plan	Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses
Site for older peoples and disable peoples housing with space for a support worker wanted (No specific site identified)	Older peoples housing mainly sold off	Section 4 - Housing (Disabled)	All house types and size supported by plan where a need exists	Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses
Small no of houses – private renting for older residents	Aging population causing greater need	Section 4 - Housing (Rental)	All types of tenure supported by plan	Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses

## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Want retirement homes for the independent but aging population to move off the hill for mobility and downsize as well		Section 4 - Housing (Retirement)	All house types and size supported by plan where a need exists	Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses
Want sites for self-build in Moccas (No specific locations identified)		Section 4 - Housing (self-build)	Plan does not differentiate between developers and self-build, so both are supported.	
Would like Housing where people can work and encourage families		Section 3 – Employment and Demographics and Section 4 – Housing	All house types and size supported by plan where a need exists.	Section 3, Policy WB01- New Business Opportunities, WB02 – Retail Development. Section 4, Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Need social housing in Bredwardine		Section 4 - Housing (Social)	All house types and size supported by plan where a need exists.	Policy WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing
All footpaths in the parish (and those in Dorstone parish) need to be cleared and/or improved to promote more tourism		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Bridle path wanted on existing track between Cross End farm and Moccas Church (Possibly also on other existing trackways in same area?)		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council



## Wyeside NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Can't put stock where there is a public footpath as people take dogs in. (Still a problem even if they are on a lead.) Either ban dogs if stock present or close the paths.		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Duchy land grant to build footpath around lower Tyberton lake never done		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Footpath from Tyberton to Preston better if a little drained – through to Preston pub for more community		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Footpath needed in Moccas (No specific site mentioned, but probably relates to request for footpath along river Wye above)		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Footpath needed in Woodbury hill wood/kites wood	(There is already a footpath on the Dorstone side of the hill, but I think they want to convert the existing trackway through the wood to a path as well? I think they want to link up with the amenity area being created further along the hill towards Dorstone to give better access to people from the Wyeside parishes side of the hill, linking up the path already coming up the hill from Blakemere?) Twice	Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Footpath needed Moccas Deer park starting around the Lawn pool		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Footpaths by river Wye	Tourist development for employment	Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Footpaths important		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council

## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Footpaths need to be intelligently used – more adjustable		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Law is an ass on the route of footpaths. Lot of interest in paths and those no longer public (from younger and older folk)		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
More footpaths in Moccas		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
More footpaths need opening up		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
More riverside access for whole of Wyese		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
More riverside access from Bredwardine bridge wanted		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
New footpath along river Wye to be created starting at the road bend below Lower Moccas Farm, by Moccas hall lodge		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
New footpath to run alongside the river Wye (Relates to Tag below Lower Moccas farm)	It seems unreasonable that local community has no access	Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Permissive footpaths through orchards in Moccas are great! Would be good if could have permissive footpath through Moccas Deer Park to Moccas court to get to Bredwardine	Safety issue – trying to walk places with small children on B road	Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Want access to the Deer Park		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Want all dogs kept on a lead OR No dogs on footpaths		Section 6 – Facilities and Services	This is outside the scope of the plan	Noted

## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Want more access to Moccas Park		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Fed up with amount of uncoordinated work done for Blakemere Parish Plan		Section 6 – Facilities and Services	Hopefully this plan will address these concerns	Issue raised with Parish Council
Better parking near churches for big events such as Weddings, Christenings & Funerals needed	Avoid dangerous parking on the verges	Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Bredwardine to Tyberton road should be improved		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Bridge Sollers to Madley road needs to be upgraded	Too much traffic	Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Bridges need maintaining and improving.		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Continue pavements to provide safe access from Mildew Lodge		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Improve road from Bridge Sollers to Madley – No weight limit on bridges	Local infrastructure important, including Bredwardine bridge, for farmers other traders crossing the Wye	Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Keep roads in better repair for cyclists		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Keep the full weight limit over Bredwardine bridge. (No limit for trade purposes)		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Maintain better roads Moccas/Bridge Sollers/Madley.		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council

## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Make Bridge Sollers roads wider		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Make road from Madley to Bredwardine straighter		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Need better roads	To enable growth	Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Need roads & drains well maintained and drains improved.		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Need snow clearing and gritting services to be maintained		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Residents to maintain verges on public roads		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Roads neglected - Route to doctors collapsing		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Roads neglected - Tyberton causeway		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Roads should have “proper” repairs rather than just filling in potholes		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Speed limit 30 mph within Bredwardine village (believed to be under consideration)	Safety	Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Speed restrictions on B4532 between Bredwardine and Moccas and beyond.	Very fast lorries are very dangerous. Especially at night some vehicles are well of over 60mph	Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council

## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Traffic management design measures needed at Bredwardine crossroads		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Traffic management design measures wanted through Moccas between Rowsford coppice and Cross end farm		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Traffic management design wanted near The Standards farmhouse towards Moccas		Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Want better access to the bus stop in Bredwardine	No pavements, road is narrow and traffic, especially during rush hour when the ‘workers bus’ is due, goes very fast with little consideration for pedestrians	Section 6 – Facilities and Services	Plan facilitates additional facilities but budget for such is outside scope	Issue raised with Parish Council
Campsite expansion/improvements wanted (Tag placed ¾ way along track from Park lodge to Moccas Court)	(I am not aware of existing campsite there)	Section 3 – Employment and Demographics and Section 6 – Facilities and Services	Encouraged in plan	Policy WB01- New Business Opportunities, WB02 – Retail Development.
Tourism good		Section 3 – Employment and Demographics and Section 6 – Facilities and Services	Encouraged in plan	Policy WB01- New Business Opportunities, WB02 – Retail Development.
Long term farming community families is key to the whole village network		Section 3 – Employment and Demographics, Section 4 – Housing.	Encouraged in plan	Section 3, Policy WB01- New Business Opportunities, WB02 – Retail Development. Section 4, Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.

## Wyeside NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Agree with quarrying		Section 3 – Employment and Demographics	New business is encouraged in the plan.	Section 3, Policy WB01- New Business Opportunities
Farming is important to the environment and economy. Farming needs to be profitable so farmers should be able to diversify/expand, including poultry houses, digesters, solar, some windmills but not a full wind farm.		Section 3 – Employment and Demographics, Section 4 – Housing.	Farming is encouraged in the plan	Section 3, Policy WB01- New Business Opportunities, WB02 – Retail Development. Section 4, Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Insufficient (teaching) jobs		Section 3 – Employment and Demographics, Section 4 – Housing.	Demand for teachers tends to be based on population size. In so far as the plan encourages people to come, work and live in Wyeside it addresses this concern.	Section 3, Policy WB01- New Business Opportunities.
Keep youngsters here with Job Opportunities		Section 3 – Employment and Demographics, Section 4 – Housing.	Plan encourages work opportunities.	Section 4, Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Need local businesses to provide work for existing and new residents		Section 3 – Employment and Demographics, Section 4 – Housing.	Plan encourages work opportunities.	Section 3, Policy WB01- New Business Opportunities, WB02 – Retail Development.
Need shops, pubs to stay open. New businesses and existing ones that are going to		Section 3 – Employment and Demographics, Section 4 – Housing.	Encouraged in plan	Section 3, Policy WB01- New Business Opportunities, WB02 – Retail Development.



# Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
create or protect jobs should be supported. E.g. Planning, Regulation				Section 4, Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
New Life – new sustainable business – farming/small permaculture		Section 3 – Employment and Demographics, Section 4 – Housing.	Encouraged in plan	Section 3, Policy WB01- New Business Opportunities, WB02 – Retail Development. Section 4, Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
No industrial buildings	We don't have the infrastructure to support access to substantial industrial activity	Section 3 – Employment and Demographics.	Large industrial buildings that require significant transport links not encouraged in plan due to rural nature of roads and lanes.	Section 3, Policy WB01- New Business Opportunities.
No opportunities for new business to start. Had to move away to start our business. No local farmers were willing to rent us a small field. Young people need to be encouraged to stay to boost local wealth + provide job opportunities. 2 21 year olds have left		Section 3 – Employment and Demographics, Section 4 – Housing.	Plan encourages but cannot be responsible for new business opportunities.	Section 3, Policy WB01- New Business Opportunities, WB02 – Retail Development. Section 4, Policy WH01 – New Housing Development, WH02 – Ensuring an

## Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
Preston-on-Wye to live elsewhere in the past year. No work nearby.				Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.
Small hotels and Bed & Breakfasts to be encouraged	Promote tourism and provide local employment	Section 3 – Employment and Demographics, Section 4 – Housing.	Encouraged in Plan	Section 3, Policy WB01- New Business Opportunities, WB02 – Retail Development. Section 4, Policy WHD02 – Change of Use.
Small industrial units and Live work units wanted	Provide employment for local people to enable them to stay in the area	Section 3 – Employment and Demographics, Section 4 Housing	Encouraged in Plan	Section 3, Policy WB01- New Business Opportunities, WB02 – Retail Development. Section 4, Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, WHD02 – Change of Use, address these concerns.
Value the young inhabitants. Encourage them to stay in the area by supporting start-up businesses		Section 3 – Employment and Demographics	Encouraged in plan	Section 3, Policy WB01- New Business Opportunities, WB02 – Retail Development. Section 4, Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable

# Wyese NDP 2011 – 2031: Consultation Statement

Public Comment	Reason	Plan Section	NDP Response	Action Taken
				Housing WH05 – Housing in Open Countryside, address these concerns.
Want to stay in the area. Looking out for an original idea to start a business.	Like farming. Will probably take over from father	Section 3 – Employment and Demographics	Encouraged in plan	Section 3, Policy WB01- New Business Opportunities, WB02 – Retail Development. Section 4, Policy WH01 – New Housing Development, WH02 – Ensuring an Appropriate Range of Tenures, Types and Size of Houses, WH03 – Affordable Housing WH05 – Housing in Open Countryside, address these concerns.

**APPENDIX 2: REGULATION 14 - PUBLIC CONSULTATION WITH STAKEHOLDERS, COMMENTS AND NDP RESPONSES/ACTIONS**

Draft

Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
Moccas Resident	Voting Process	<p>I do not have any questions to raise on the plan itself, but would be interested to hear others' comments. Presumably there will be some feedback via the parish magazines?</p> <p>I do have concerns regarding the voting day, which occurred to me because we are away for the public meeting day. Will it be possible to include postal or proxy voting to allow for anyone being away that day?</p>	<p>This document provides the detailed responses to the stakeholder consultation and public events and will be referenced in parish magazines with regards to comments from stakeholders and NDP responses/actions.</p> <p>The referendum will be run by the Herefordshire District Council in the same way as any election event voting is undertaken. This will include postal and proxy voting arrangements.</p>	Agreement to reference this document in the parish magazines.
Bredwardine with Brobury Parochial Church Council (the PCC)	Section 4 – Housing and Section 5 – Environment and Heritage	<p>PCC is responsible for St Andrew’s Church and churchyard in Bredwardine. It welcomes the Wyeside Neighbourhood Plan and its intent to safeguard the character of the area and individual villages. The PCC also notes and supports the value placed on the environment, historic buildings and views within the neighbourhood plan area.</p> <p>The PCC believes that it is important to protect the immediate surroundings of the historic buildings in the plan area as well as the buildings themselves. Where possible, specific reference should be made to any surrounding land which will be protected. The worshipping community and visitors to St Andrew’s</p>	NDP Amendment 1: Policy WH01 – New Housing Development Change to description of protected orchards and views.	Policy WH01 – New Housing Development statement <b>deleted</b> : For the avoidance of doubt, where land on the opposite side of the road from a building designated as the centre of a village is a green space (no houses having been built in that location) no housing development will be allowed in that area. By way of example, this means no development will be allowed in the orchard opposite the Red Lion Hotel in the Bredwardine village centre, east of the B4352, or the green spaces between the orchard and the west bank of the river Wye.

Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
		<p>Church Bredwardine greatly value the peace and tranquillity afforded by its setting near the River Wye, surrounded by orchards. The PCC wish to ensure that the character of the setting is maintained. The plan attempts to limit development in Bredwardine by defining the village centre and excluding development as follows:</p> <ul style="list-style-type: none"> <li>• The PCC requests that the policy is amended to specifically exclude development in the orchards on either side of Church Lane this being the orchard referred to as ‘opposite the Red Lion’ and the orchard bordered by Church Lane, the River Wye and the road running from the Red Lion to Bredwardine Bridge.</li> <li>• The PCC also requests that there is specific protection of the iconic views of Bredwardine Bridge and the River Wye from the footpath running from the church to the bridge.</li> </ul>		<p>Policy WH01 – New Housing Development additional statements: Notwithstanding the requirement for development to take place contiguous to village centres, development is specifically excluded in the Bredwardine orchards on either side of Church Lane. This being the orchard ‘opposite the Red Lion’ village centre, and the orchard bordered by Church Lane, the River Wye and the road running from the Red Lion to Bredwardine Bridge.</p> <p>In addition, the iconic views of Bredwardine Bridge and the River Wye from the footpath running through the orchard from the church to the bridge are protected from any form of development.</p>
Historic England	Section 5 – Environment and Heritage	<p>Historic England is supportive of both the content of the document and the vision and objectives set out in it.</p> <p>The emphasis on the conservation of local distinctiveness and the protection of locally significant buildings and landscape character including archaeological remains and important views is to be applauded.</p> <p>Overall the plan reads as a well-considered, concise and fit for purpose document which we consider takes a</p>	Not required	Not required



# Wyeside NDP 2011 – 2031: Consultation Statement

Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
		suitably proportionate approach to the historic environment of the Parish.		
Natural England	Section 5 – Environment and Heritage	Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England does not have any specific comments on this draft neighbourhood plan.	Not required	Not required
Environment Agency	Section 5 – Environment and Heritage	<p>As part of the recently adopted Herefordshire Council Core Strategy updates were made to both the Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS). This evidence base ensured that the proposed development in Hereford City, and other strategic sites (Market Towns), was viable and achievable.</p> <p>The updated evidence base did not extend to Rural Parishes at the NDP level so it is important that these subsequent plans offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period.</p> <p>As stated within the Wyeside plan the area of the five parishes is impacted by fluvial flooding from the River Wye (SAC) and its tributaries. We welcome Environmental Objective 7 and its associated Policy WE01 (Environmental Restrictions on Development).</p> <p>Whilst we also welcome reference to flood risk within the plan we would not, in the absence of specific sites</p>	Not Required	Environment Agency guidance passed to Wyeside Parishes Group for reference with respect to future housing development plans.

# Wyeside NDP 2011 – 2031: Consultation Statement

Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
		allocated within areas of flooding, offer a bespoke comment at this time. You are advised to utilise the Environment Agency guidance and pro-forma which should assist you moving forward with your Plan.		
Wyeside Resident visit to RIBA 2016 exhibition in London. Debated at Regulation 14 Consultation Public Meeting 9 June 2016 and followed up with an email to the Steering Group.	Section 4 - Housing and Section 5 – Environment and Heritage	<p>The Royal Institute of British Architects (RIBA) exhibition in London entitled “At Home in Britain: Designing the House of Tomorrow” considered village design; best practices and lessons learned from past mistakes. Mistakes made in planning housing after the war in the '50s were given as two examples; 1. A row of houses along a road, and 2. A row where there was a parallel slip road. Our concern here is that, as our draft plan is currently written, a developer could build up to 5 houses in a row. Extending the villages in a number of directions along existing roads, and in a rather suburban way without enhancing the village feel. We should be thinking about side lanes with small organic clusters of houses rather than formal “cut-de-sacs”. Organic clusters off side lanes with interesting pedestrian lanes that connect clusters with other parts of the village is the recommended approach.</p> <p>I think it is important we get this right in our plan to ensure that the villages expand in a way that enhances the community. We would suggest the following for consideration by the committee in the neighbourhood plan:</p> <p>1) Replacing the reference to contiguous ribbon development with a form of words that state any multi-</p>	<p>Policy WH01 – New Housing Development updated: Such an approach is feasible within the Wyeside NDP policy of development contiguous to a village centre and has been adopted within the updated NDP. It replaces consideration of formal “cut-de-sacs”, slip roads and limited ribbon development where the development site is for 3 or more houses.</p> <p>The size of some development sites for two houses are likely to limit site</p>	<p><b>Deleted:</b> That new housing is of a single plot depth and fronts directly onto the existing villages’ road networks and reflects the character of the village and surrounding environment; Where the number of dwellings per site is three or more, up to the maximum of five, a slip road running parallel to the passing road and separated by a grass verge and/or hedge will be permitted to provide a single point of access and maintain the single plot depth above.</p> <p><b>Added:</b> That new housing reflects the character of the village and surrounding environment, and development sites of three houses or more should</p>

Regulation 14 – Stakeholder Consultation				
Stakeholder		Stakeholder Comments	NDP Response	Action Taken
		<p>house development (i.e. more than one house) is built in an organic cluster design off a new access lane to any existing roads.</p>	<p>configuration options and in some cases preclude an offset cluster design. So applying this to a development site that is limited to 2 houses cannot be a mandatory requirement. Consequently, three or more houses has been selected as the starting point for development of organic housing clusters built off new access lanes.</p>	<p>adopt the RIBA 2016 “best practice” design approach. This requires small organic clusters of houses to be built off new access lanes, with linked pathways to the rest of the village, to enable residents to maintain and develop communities within an environment that is physically connected.</p>
		<p>We should also be protecting existing hedges and veteran trees in the villages in any new development. By building along existing roads this will not be achieved. the best practice proposal from the RIBA exhibition is to cluster small groups of houses and to make the use of the land behind existing road frontages in a sympathetic way using side lanes that exploits the beauty of the surrounding countryside and utilises side lanes to create the organic clusters, minimising hard forecourts and maximising concepts like walled cottage gardens where appropriate.</p>	<p>This protection is already included in Policy WE02 – Landscape Design Principles</p>	<p>Not required.</p>
		<p>It also suggested that natural half hedges were preferable to closed board panel fences along the boundaries of developments to soften the impact on the villages.</p>	<p>Already included in Policy WE02 – Landscape Design Principles.</p>	<p>Not required.</p>
		<p>2) Emphasis should be given to a sufficient natural garden space rather than hard standing cover, and with natural low hedge borders rather than close panel fences.</p>	<p>Already included in Policy WE02 – Landscape Design Principles.</p>	<p>Not required.</p>

Regulation 14 – Stakeholder Consultation				
Stakeholder		Stakeholder Comments	NDP Response	Action Taken
		<p>3a) House design is sympathetic to the vernacular of the current architecture of the villages (think this one may already be covered in design)</p> <p>3b) An architect should be engaged on new developments.</p> <p>In summary, all our villages have evolved since medieval times with farms and organic growth of traditional cottages in the village context, which currently means that most housing across the villages have sizeable front gardens that you can see into from outside. I think most people would agree that we need to maintain this organic open feel rather than allow developers to make the mistakes of the past.</p>	<p>Yes. It is included in policies WH01 – New Housing Development and WHD01 – New Building Design.</p> <p>Due to low average salaries within Wyeside a primary concern is the lack of affordable housing. Consequently, the additional cost of using architects for all new developments can only be an aspiration not a mandatory requirement.</p> <p>Agreed</p>	<p>Not required.</p> <p>Not required.</p> <p>See above comments and actions.</p>
Dwr Cymru Welsh Water	Section 5 – Environment and Heritage	<p>Dŵr Cymru Welsh Water (DCWW) appreciates the opportunity to respond and we offer the following representation: Given that the Wyeside Neighbourhood Plan (NP) has been prepared in accordance with the Adopted</p>	<p>September 2016 plan includes DCWW comments, a new objective and policy to comply with DCWW requirements.</p>	<p>See below actions below against subject items:</p>

Regulation 14 – Stakeholder Consultation				
Stakeholder		Stakeholder Comments	NDP Response	Action Taken
		<p>Herefordshire Local Plan Core Strategy, DCWW are supportive of the aims, objectives and policies set out. We note that there is no specific reference to the capabilities of the public sewerage system or wastewater treatment works (WwTW) to accept the foul flows from the amount of new development proposed, other than the wording under (Section 6.5 of the April 2016 plan, Section 5.6 of the current September 2016 plan). As such, we feel that the addition of the following policy (in line with Policy SD4 of the Core Strategy) would provide the assurance that new development will only be permitted where the capacity of the public sewerage network and/or WwTW allows.</p> <p><b>Public sewerage network and wastewater treatment works (WwTW)</b>  <b>New Policy - Development that may result in the capacity of the public sewerage network and/or the wastewater treatment works (WwTW) at Bredwardine, Moccas and Preston-on-Wye becoming overloaded will not be permitted.</b></p> <p>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 improvements themselves via the provisions of the Water Industry Act (1991) and/or section 106 of the Town and Country Planning Act (1990).</p> <p>With regard to the housing growth proposed over the NP period, we can confirm the following:  <b>Bredwardine (for up to 10 dwellings)</b></p>		<p>New objective added ensuring that WwTW capacity is considered and if insufficient to meet requirements new development should not be permitted. This is set out in the new policy WE05 in Section 5 – Environment and Heritage.</p> <p>Phasing comments and capacity statements added to plan.</p> <p>Water supply and WwTW capacity information added to Section 5 – Environment and Heritage, sub-section 5.6 of the plan.</p>

Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
		<p><b>Water supply:</b> There are no issues in providing a supply of water for the housing growth proposed to Bredwardine, though dependant on the location of development some level of off-site mains may be required.</p> <p><b>Sewerage:</b> There are no issues with the public sewerage network accommodating the level of foul-flows for the housing growth proposed to Bredwardine, though dependant on the location of development some level of off-site sewers may be required.</p> <p><b>Wastewater treatment:</b> There are no issues with Bredwardine WwTW accommodating the housing growth proposed.</p> <p><b>Preston-on-Wye (for up to 10 dwellings)</b></p> <p><b>Water supply:</b> There are no issues in providing a supply of water for the housing growth proposed to Preston-on-Wye, though dependant on the location of development some level of off-site mains may be required.</p> <p><b>Sewerage:</b> There are no issues with the public sewerage network accommodating the level of foul-flows for the housing growth proposed to Preston-on-Wye, though dependant on the location of development some level of off-site sewers may be required.</p> <p><b>Wastewater treatment:</b> There are no issues with Preston-on-Wye WwTW accommodating the housing growth proposed.</p> <p><b>Moccas (for up to 8 dwellings)</b></p> <p><b>Water supply:</b> There are no issues in providing a supply of clean water for the housing growth proposed to Moccas, though dependant on the location of</p>		



Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
		<p>development some level of off-site mains may be required.</p> <p><b>Sewerage:</b> There are no issues with the public sewerage network accommodating the level of foul-flows for the housing growth proposed to Moccas, though dependant on the location of development some level of off-site sewers may be required.</p> <p><b>Wastewater treatment:</b> Moccas WwTW is currently biologically overloaded. There are no improvements planned within the current Asset Management Plan (AMP6 -2015-2020) therefore if a developer wishes to progress a site in advance of our future regulatory investment, they will need to find the improvements themselves via the provisions of a section 106 Agreement (of the Town &amp; Country Planning Act 199). Alternatively, they may seek the utilisation of alternative drainage methods if practical, under the provisions of Policy SD 4 of the Adopted Core Strategy.</p> <p><b>Blakemere and Tyberton (for up to 5 dwellings in each settlement)</b></p> <p><b>Water supply:</b> Outside of the three above listed settlements, there are no issues in providing a supply of clean water, though dependant on the location of development some level of off-site mains may be required.</p> <p><b>Sewerage/wastewater treatment:</b> There is no public sewerage or wastewater treatment facilities. As such, any new housing growth in these locations will be required to utilise alternative drainage methods, under the provisions of Policy SD 4 of the Adopted Core Strategy.</p>		

Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
		<p>It is difficult to provide further detail with regard to the capability of our assets to accommodate the level of growth proposed in the Neighbourhood Plan as no sites have been specifically allocated. Therefore, when planning applications are submitted for new housing development within the Neighbourhood Plan area, we will provide consultation responses when consulted by Herefordshire Council. We hope that the above information will assist as the Neighbourhood Plan progresses. In the meantime, should you require any further information please do not hesitate to contact us at Forward.Plans@dwrcymru.com or via telephone on 0800 917 2652.</p>		
Wyeside Land Agent	Section 4 – Housing Policy WH01 – New Housing Development	<p>This policy seeks to provide a "...flexible approach to future requirements...". My concern is that whereas this policy may be suitable in some villages it is much too rigid a policy to apply across the parishes where every village is different. By way of an example Moccas village has a village hall which in this policy is deemed to be the centre of the village. Applying this policy in Moccas would not be appropriate due to various constraints such as the following:</p> <ul style="list-style-type: none"> <li>a) The adjacent field to the village hall is part of a Grade II* listed park and garden</li> <li>b) The field beyond this running down to the war memorial is an ancient orchard which I would imagine most residents would not consider suitable for development due to its high value as a landscape feature.</li> </ul>	<p>Plan updated to provide two village centres for Moccas to address limited scope for development provided by the village hall centre only. Development contiguous the village centres remains the considered best approach as it is more adaptable to variations in each village’s individual features. Settlement boundaries has been rejected due to complexity involved in seeking agreement with residents in scattered settlements such as those</p>	<p>Section 4.7 Spatial Strategy – Expansion of Village Centres Only. States “ Moccas has fifty-six houses with two centres and a fair scattering. For the purposes of housing developments, the village hall, and the village cross which includes Woodbury Lane, represent the two centres for the village of Moccas.</p>

Regulation 14 – Stakeholder Consultation				
Stakeholder		Stakeholder Comments	NDP Response	Action Taken
		<p>There is also a more recent orchard at the cross roads by the war memorial.</p> <p>In villages such as this a less prescriptive policy to housing is required as for the requisite number of houses to be built which allows the community to agree a bespoke policy that suits the individual needs of the village. For instance, it might be appropriate for the community to choose one site as a small development rather the type of ribbon development proposed in the plan. In addition, a more flexible policy would help in meeting the policies outlined in WE01/02 and 03.</p>	<p>found in Wyeside, and known weaknesses such as an increase in density of properties within boundaries in comparison with historical development space, impacting on look and feel of the village.</p> <p>Agreed. The updated plan is adopting a RIBA best practice approach using access lanes with small organic clusters of houses connected by pedestrian lanes with other parts of the village which addresses this concern. In addition, WH01 “contiguous to the village centre(s); i.e. using a spatial area of land, or field adjacent to a village centre, <b>so as to not result in free standing, individual or groups of dwellings, which are obviously separate from village centres;</b>” supports the variable spacing between houses within and across the</p>	<p>Policy WH01 – New Housing Development updated to include: “That new housing reflects the character of the village and surrounding environment, and development sites of three houses or more should adopt the RIBA 2016 “best practice” design approach. This requires small organic clusters of houses to be built off new access lanes, with linked pathways to the rest of the village, to enable residents to maintain and develop communities within an environment that is physically connected”.</p>

Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
		<p>Requested change: "Ensures the proposal reflects the size, role and function of each village is close to the village centre(s) except in the following circumstances:</p> <p>a) There is a suitable brownfield site within 1 mile of the village centre</p>	<p>settlements that are a key feature of Wyeside villages.</p> <p>Whilst priority is given within the plan to use of brownfield sites that are contiguous to village centres, a primary concern of residents has been the development and maintenance of sustainable village communities. Agreeing to sites one mile from the village centre would be counterproductive to maintaining and developing village communities within an environment that is physically connected, and is not consistent with RIBA best practice village design. Adoption of settlement boundaries would also limit use of brownfield sites in the same way.</p>	<p>No change to plan.</p>
		<p>b) The individual characteristics or constraints of the village make development on the edge of the village preferable in terms of landscape and amenity.</p>	<p>This would require an additional definition of what comprises an “edge of a village” due to the scattering of houses over a wide area</p>	<p>No change to plan.</p>

Regulation 14 – Stakeholder Consultation				
Stakeholder		Stakeholder Comments	NDP Response	Action Taken
		<p>c) There is no available development land adjacent to the village centre.</p>	<p>that are considered to be part of a village. This would reduce village community interaction and risks opening up green spaces to development.</p> <p>Houses contiguous to the Moccas village hall centre on the road to Preston-on-Wye may offer possible development sites. We have also increased Moccas village centres to two; the village hall, and the village cross which includes Woodbury Lane, so a number of additional potential development sites have become possible.</p>	<p>Section 4.7 Spatial Strategy – Expansion of Village Centres Only. Plan updated to include two village centres for Moccas.</p>
		<p>d) The land adjacent to the village centre cannot be developed due to the existence of important green spaces or landscape designations</p>	<p>Important green spaces or landscape designations will not be affected.</p>	<p>Not required</p>
		<p>I have no objection to the principle of a maximum of five dwellings per development site in these parishes but building 5 dwellings in a row in some of these villages could ruin the character of them.</p>	<p>Agreed. The updated plan is adopting a RIBA best practice approach using access lanes with small organic clusters of houses connected by pedestrian lanes</p>	<p>Plan updated to encourage small organic clusters for development sites of three or more houses.</p>

Regulation 14 – Stakeholder Consultation				
Stakeholder		Stakeholder Comments	NDP Response	Action Taken
		<p>Draft plan text: “That new housing is of a single plot depth and fronts directly onto the existing villages’ road networks” Comment - This type of prescriptive policy lacks the degree of flexibility that local communities require to ascertain what type and scale of development they require. It might be suitable in some locations but could also have an adverse effect on the character of a village. I would suggest the deletion of this policy as it is more appropriate for suburban planning.</p>	<p>with other parts of the village which addresses this concern.</p> <p>Agreed</p>	<p>Deleted.</p>
		<p>“Where the number of dwellings per site is three or more, up to the maximum of five, a slip road running parallel to the passing road and separated by a grass verge and/or hedge will be permitted to provide a single point of access and maintain the single plot depth above”</p> <p>Comment - This type of ribbon development is inappropriate for some rural villages which may benefit from the development of a small and well landscaped housing development. I would suggest the deletion of this policy as it is more appropriate for suburban planning.</p>	<p>Agreed.</p>	<p>Deleted and replaced with RIBA best practice organic clusters.</p>
		<p>Plan text: That there is no adverse impact on the environment or privacy or amenity of neighbours; Comment - I would suggest the following minor amendment to this policy; "in so far as is reasonably possible in light of the other requirements of this policy ",</p>	<p>Agreed.</p>	<p>“in so far as is reasonably possible in light of the other requirements of this policy” added to plan text.</p>



Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
		<p>Comment - Some brownfield sites in and around villages may be just outside the village envelope but capable of absorbing the number of houses that the village is obliged to build. The community needs the flexibility to develop these sites if other sites in and around the village centre and deemed to be less suitable. I would propose the rewording of this policy as follows:</p> <p>"That gives priority to the development of suitable brownfield sites that might be outside the village envelope"</p> <p>Comment on: "Policy WE03 - Protecting Local Green Spaces and Important Views. To bring this policy in line with my earlier suggestions I would suggest the final bullet point is amended as follows:  <i>"In addition, green spaces, views and vistas valued by residents are protected insofar as is reasonably practical by policies, WH01 – New Housing Development and</i></p>	<p>Whilst priority is given within the plan to use of brownfield sites that are contiguous to village centres, a primary concern of residents has been the development and maintenance of sustainable village communities.</p> <p>Agreeing to sites that are not contiguous to village centres would be counterproductive to maintaining and developing village communities within an environment that is physically connected, and is not consistent with RIBA best practice village design. Additionally, the revised plan includes sufficient potential development sites.</p> <p>Development contiguous the village centres remains the considered best approach. Edge of village as a basis for development boundaries is ambiguous and almost impossible to define without</p>	<p>No change to plan.</p> <p>Not required</p> <p>In addition, green spaces, views and vistas valued by residents are protected insofar as is reasonably practical by policies, WH01 – New Housing Development, <i>(text in brackets deleted: in particular that any development "is contiguous to the village centre(s) so as to not result in free standing, individual or groups of dwellings which</i></p>

Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
		<i>WE01 – Environmental Restrictions on Development, near the river Wye and associated flood zones".</i>	including green spaces. Settlement boundaries has also been rejected due to complexity involved in seeking agreement with residents in scattered settlements such as those found in Wyeside, and known weaknesses such as an increase in density of properties within boundaries in comparison with historical development space, impacting on look and feel of the village. Note: Action taken is superfluous text deleted.	<i>are obviously detached from, or peripheral to, the village centres”</i> ), and WE01 – Environmental Restrictions on Development, near the river Wye and associated flood zones.  <b>Text now reads:</b> In addition, green spaces, views and vistas valued by residents are protected insofar as is reasonably practical by policies, WH01 – New Housing Development and WE01 – Environmental Restrictions on Development, near the river Wye and associated flood zones"
Wyeside Resident Regulation 14 Consultation Public Meeting 9 June 2016	Section 4 – Housing and Section 5 – Environment and Heritage	Are policies too onerous, which the questioner felt could prohibited any building. The resident raised the policy on SUDS as an example of their concerns.	Standard Urban Drainage System (SUDS) is an environmental policy to manage surface water at a level that is appropriate to the hydrological setting of the site. Development should not result in an increase in runoff. It was also explained to the questioner that the list of protocols incorporated into the plan constitute standard planning fare and are therefore universally	Policy WH01 bullet 4 updated: “That there is a preferred maximum of five dwellings per development site in Moccas, two dwellings per site in the smaller villages of Blakemere and Tyberton, and up to ten dwellings in the larger villages of Bredwardine and Preston-on-Wye, (for the purposes of addressing the need for affordable housing and receiving contributions from developers for infrastructure) whilst maintaining the scale and feel of the village centres;”

Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
			applicable. With the exception of requirements for provision of affordable houses and an appropriate mix of tenure, type and size of houses which has since been limited to the larger development sites of ten houses in line with national planning policy, reference policies WH01 and WH02.	
Wyeside Resident comments following Regulation 14 Consultation Public Meeting 9 June 2016	Section 4 – Housing and Section 5 – Environment and Heritage	<p>I list a few points which may be of use to your committee:</p> <p>1. I agree with the gentleman who spoke at the meeting - my immediate impression when quickly reading the plan was that it appeared to be overly prescriptive and formulaic which initially might put people off when considering whether to develop within the Wyeside parish or possibly create more challenges at planning application time which is something nobody would want.</p>	<p>Agreed that reading all the policy statements (protocols) at once can appear burdensome. Requirements for provision of affordable houses and an appropriate mix of tenure, type and size of houses has been limited to development sites of ten houses in line with national planning policy, reference policies WH01 and WH02. However, the remaining list of protocols incorporated into the plan constitute standard planning fare and are therefore universally applicable. They are not</p>	<p>Policy WH01 bullet 4 updated: “That there is a preferred maximum of five dwellings per development site in Moccas, two dwellings per site in the smaller villages of Blakemere and Tyberton, and up to ten dwellings in the larger villages of Bredwardine and Preston-on-Wye, (for the purposes of addressing the need for affordable housing and receiving contributions from developers for infrastructure) whilst maintaining the scale and feel of the village centres;”</p>

Regulation 14 – Stakeholder Consultation				
Stakeholder		Stakeholder Comments	NDP Response	Action Taken
		<p>2. The idea of contiguous roadside development appears to me to be too vague and not helpful - I believe the villages would become boring and uninteresting. A better way of describing development might be using the term "infill" sites which would give greater flexibility and interest when considering the development.</p> <p>3. In the services section no mention seemed to be given to consideration of the adequacy of water supply and mains drainage which of course may inhibit development if inadequate.</p>	<p>intended to block development. By way of an example if you were to build a two storey house of traditional construction that met current building regulations it would pass through all the requirements subject to also complying with environmental restrictions which are common to all development near the River Wye.</p> <p>Limited ribbon development along current roads has been replaced with RIBA Village Design best practice utilising organic clusters of houses for three or more houses. This will act like your proposed infill sites but with footpaths linking to other parts of the village.</p> <p>It is stated as a requirement in section 5.6 under Environment and Heritage. However, the September 2016 plan includes DCWW comments setting out current</p>	<p>September 2016 version of the plan employs RIBA best practice for village design which addresses this comment.</p> <p>September 2016 plan complies with this requirement.</p>

Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
		<p>4. Mention was made of attracting young professional families to the area, however I believe unless the internet infrastructure can be urgently improved this will not be possible because my experience tells me that as office accommodation becomes more expensive then shared provision and home working will become more attractive to companies trying to control their overheads.</p>	<p>capacities, a new objective and policy to comply with DCWW requirements.</p> <p>Agreed. Improved broadband is critical to attracting young professional families. This is emphasised in the Section 7 – Conclusion of the plan, item 7.1 Employment and Demographics which states: “Fundamental to success is the need to encourage and support local enterprise, develop home working using broadband facilities, create job opportunities through appropriate economic development, and promote sustainable development in the five villages by encouraging young working families to live here.”</p>	<p>No change required.</p>
		<p>5 Finally, if you wish to attract shared ownership building and homes for rent provision, then it might be prudent to mention the improvement of public transport provision because it may not be possible for younger families to pay rent and buy and run one or even two cars (both parents working) in rural areas such as ours in</p>	<p>Agreed. Some young families may choose a more rural environment in which to bring up their children. These are our target market for</p>	<p>The development of transport and recreational facilities are important aspects of meeting these requirements but are outside the remit of the NDP Steering Committee. However, your concerns have been raised with the Wyeside parish councillors.</p>

## Wyeside NDP 2011 – 2031: Consultation Statement

Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
		competition with cities like Hereford with all the amenities for younger people and families.	attracting new working families into Wyeside.	
Herefordshire County Council Planning Services		Below are combined comments from the Planning teams, the comments relate to the practicality of the policies in relation to development management usage and general conformity with the Core Strategy and its requirements. Each planning service is shown as a separate section under its respective function.		
Neighbourhood Planning Services	Front cover	This should include reference to the plan period 2011-2031	Agreed	The front covers of the Plan, Questionnaire Results/Comments, Consultation Statement and Basic Condition Statement have all been updated to include 2011 – 2031 in their titles.
	Housing Market Area map	This map has been stretched slightly	Agreed	Map shape corrected.
	4.5 September plan	Sizes of dwellings was removed from the Core Strategy policy during the examination due to lack of robust evidence what size criteria should be imposed. Is there robust evidence able to evidence the size of site and dwellings (m2) requirements within this objective	No evidence. Size of sites was based on a draft version of the core strategy and had not been changed for the April version of the plan circulated for Regulation 14.	Size of sites deleted from September version of plan.
	WH01 – New Housing Development	Will need policy criteria to prevent ribbon development along the roads within the parish which eventually may lead to villages joining. Defining settlement boundaries and development criteria would allow flexibility whilst safeguarding against ribbon development.	RIBA Village Design “Best Practice” Organic Clusters have been introduced for three or more houses in a development to address this problem. This effectively	4.6 Royal Institute of British Architects 2016 - Village Design “Best Practice”. Housing Objective 3 – Adopt RIBA 2016, Village Design “Best Practice”.

Regulation 14 – Stakeholder Consultation				
Stakeholder		Stakeholder Comments	NDP Response	Action Taken
	WH03 – Affordable Housing	Government policy now indicates that affordable housing can only be provided on sites of more than 10. This would discount Wyeside if limited to sites of 5 and under.	introduces infill and precludes ribbon development for sites greater than 2 houses. Settlement boundaries were rejected because they introduce increases in housing density over time, which can destroy the look and feel of our villages.  Availability of affordable housing is a primary requirement of Wyeside residents.	Policy WH01 – New Housing Development updated to include an option for development sites of ten or more houses if they included affordable housing, and contributions from developers for infrastructure in the two larger villages of Bredwardine and Preston-on-Wye.
Planning Policy	WB01- New Business Opportunities	RA6, E1, E2, E4 Minor correction- bullet point 6: “...Policy E4 – Tourism,”	Bullet point 6 corrected.	Policy E3 – Tourism deleted and replaced with Policy E4 - Tourism.
	WB02- Retail Development	RA6, E6. Is there a reason/evidence to restrict the size of A1 retail proposals to under 80sqm? This could be seen as overly prescriptive and could restrict proposals for retail provision coming forward.	The small size of Wyeside rural communities; five widely dispersed villages with a total population of c.550 mainly located on single lane roads would suggest 80 sqm is probably more than the maximum area local peoples’ footfall could	80sqm restriction deleted.



Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
	4.3 -Projected Housing Increase to 2031, and 4.4 - Village Development- Numbers of New Houses	The proportional growth projections should be seen as a minimum target and not a cap or limit on development. Is there evidence to suggest that the targets are likely to be met through a criteria based approach? For example, historic windfall rates?	<p>support. However, the restriction has been deleted</p> <p>The questionnaire evidence base suggested the growth projections were acceptable to residents. No cap has been set on total number of houses in the policies, so long as the scale and feel of the village centres is maintained, reference policy WH01. Historical growth rates over an equivalent period have been in line with targets. Careful site analysis of each of the five villages has confirmed that the criteria based approach offers more than enough development options to meet growth requirements.</p> <p>Note: A greater risk to housing development is likely to be the lack of local employment opportunities depressing demand and becoming causal to missing the targets.</p>	<p>Not required.</p> <p>A second village centre has been added to Moccas to ensure that the number of development site opportunities across the five villages exceeds requirements, using a criteria based approach. Reference 4.7 Spatial Strategy “Moccas has fifty-six houses with two centres and a fair scattering. For the purposes of housing developments, the village hall, and the village cross which includes Woodbury Lane, both set out in the plan, represent the two centres of the village for Moccas.”</p>

Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
	4.5- Number of Houses on a Development Site	There are some very specific criteria set out here- again this could be viewed as overly prescriptive and could serve as a barrier to new housing provision being delivered. Have these been evidenced?	Questionnaire Response evidence substantiated this and was provided in the plan at Appendix 4 - The Maximum Size (Number of Houses) of any one Development Site Acceptable by each Village. In addition, these sizes reflect historical supply and demand figures. However, the need for affordable housing is a primary concern in Wyeside so these site size preferences have been raised to ten or more houses for the two larger villages in the September 2016 version of the plan.	Policy WH01 bullet 4 updated: “That there is a preferred maximum of five dwellings per development site in Moccas, two dwellings per site in the smaller villages of Blakemere and Tyberton, and ten or more dwellings in the larger villages of Bredwardine and Preston-on-Wye, (for the purposes of addressing the need for affordable housing and receiving contributions from developers for infrastructure) whilst maintaining the scale and feel of the village centres;”
	4.6- Spatial Strategy- Expansion of Village Centres Only	Is there evidence to suggest that there will be sufficient land plots to deliver enough proposals that can be seen as contiguous to the village centres? Defining a looser settlement boundary around villages within which development would be acceptable within or adjacent to would give far more flexibility and be less restrictive, whilst still ensuring that new development will have a relationship with the existing built form.	Careful on site analysis of each of the five villages has confirmed that the criteria based approach offers significantly more development options than is required to meet growth requirements. In addition, WH01 “contiguous to the village centre(s); i.e. using a spatial area of land, or field	Not required.

Regulation 14 – Stakeholder Consultation				
Stakeholder		Stakeholder Comments	NDP Response	Action Taken
	Section 4 – Housing Policies	<p>Development proposals in the countryside away from the villages should be assessed against Core Strategy policies RA3 - Herefordshire’s countryside, RA4 - Agricultural, forestry and rural enterprise dwellings, and RA5 – Re-Use of Rural Buildings.</p> <p>This policy is too restrictive. It may prove difficult to identify sufficient plots of land under the very specific</p>	<p>adjacent to a village centre, <b>so as to not result in free standing, individual or groups of dwellings, which are obviously separate from village centres;</b>” supports the variable spacing between houses within and across the settlements that are a key feature of Wyeside villages. Settlement boundaries were rejected because they introduce increases in housing density over time, which can destroy the look and feel of the five villages and would be controversial to implement due to the scattered nature of the five village settlements.</p> <p>Wyeside NDP Housing policies comply with RA3, RA4 and RA5, with added environmental restrictions to comply with Wyeside local requirements.</p> <p>Careful on site analysis of each of the five villages has</p>	<p>The assessment of conformity against these policies has been undertaken in the Wyeside NDP - Basic Conditions Statement, and they are in compliance.</p> <p>Not required.</p>

Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
	WH01 New Housing Development	<p>locational criteria set out to guarantee delivery of the minimum housing numbers required.</p> <p>Limiting the numbers only to small plots of 5 or less will make it difficult to obtain affordable housing contributions under national policy, which indicates that only sites of a minimum of 10 dwellings must provide affordable housing. It will also make it less viable for developers to provide other contributions (s106) that could benefit the community.</p>	<p>confirmed that the criteria based approach offers significantly more development options than is required to meet growth requirements.</p> <p>Questionnaire Response evidence substantiated this and was provided in the plan at Appendix 4 - The Maximum Size (Number of Houses) of any one Development Site Acceptable by each Village. In addition, these sizes reflect historical supply and demand figures. However, the need for affordable housing is a primary concern in Wyeside so site size preferences have been raised to ten or more houses for the two larger villages in the September 2016 version of the plan.                      Note: A greater risk to housing development is likely to be the lack of local employment opportunities depressing demand and</p>	<p>Policy WH01 bullet 4 updated: “That there is a preferred maximum of five dwellings per development site in Moccas, two dwellings per site in the smaller villages of Blakemere and Tyberton, and ten or more dwellings in the larger villages of Bredwardine and Preston-on-Wye, (for the purposes of addressing the need for affordable housing and receiving contributions from developers for infrastructure) whilst maintaining the scale and feel of the village centres;”</p>

Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
	WH02- Ensuring an appropriate Range of Tenures, Types and Size of Houses	This is not in accordance with the Core Strategy or the NPPF. Only sites of 10 dwellings or more, or proposals which have a maximum combined floor space of over 1000sqm must make affordable housing contributions. With only small scale proposals, it is also less likely that a mix of sizes, types or tenures can be sought. In particular it is unlikely also that it will be viable for developers to make affordable housing contributions.	becoming causal to missing the targets.  Affordable housing is a primary requirement in the evidence base both from the open days and responses to the questionnaire. Policy WH01 bullet 4, has been modified to comply with NPPF requirements to encourage development of affordable housing and receiving contributions from developers for infrastructure. WH02 has also been updated to include affordable housing on development sites of ten or more dwellings.	WH01 – bullet 4: “That there is a preferred maximum of five dwellings per development site in Moccas, two dwellings per site in the smaller villages of Blakemere and Tyberton, and ten or more dwellings in the larger villages of Bredwardine and Preston-on-Wye, (for the purposes of addressing the need for affordable housing and receiving contributions from developers for infrastructure) whilst maintaining the scale and feel of the village centres;” Re-worded Policy WH02 – Ensuring an appropriate Range of Tenures, Types and Size of Houses <ul style="list-style-type: none"> <li>• All proposals for new housing development are encouraged to produce an appropriate mix of tenures, types and size of houses that reflect the needs of Wyeside;</li> <li>• In the larger villages of Bredwardine and Preston-on-Wye where sites of ten or more dwellings are supported, a mix of tenures, types and sizes must be provided including affordable houses and should integrate these latter houses and market houses across a site:</li> </ul>
	WH03- Affordable Housing	These issues are arguably covered as comprehensively by the equivalent policies in the Core Strategy, with largely the same criteria. These policies could therefore perhaps be viewed as superfluous.	There are marginal differences that relate to environmental policy restrictions. However, as the	No change

Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
	WH04- Re-use of Rural Buildings WH05- Housing in Open Countryside		referendum will be based on the NDP we wanted to ensure that residents had a full understanding of the policies applicable to the plan from the one document.	
	WHD01- New Building Design	SuDS should be incorporated to manage surface water at a level that is appropriate to the hydrological setting of the site. Development should not result in an increase in runoff.	Already included in bullet 6 of New Buildings and bullet 5 of Agricultural and Business Buildings.	No change.
	WHD02- Change of Use	RA5, LD4 compliant.	Not required	No change
	WE01- Environmental Restrictions on Development	LD2, SD3 compliant.	Not required	No change
	WE02- Landscape Design Principles	LD1 compliant.	Not required	No change
	WE03- Protecting Local Green Spaces and	LD1-LD3 “Important views” is a subjective term, that without evidence or clarity on where these exist, should not be included in the policy.	Use of “Important Views” in the title of WE03 is valid as it states: “In addition, green spaces, views and vistas	No change

Regulation 14 – Stakeholder Consultation				
Stakeholder		Stakeholder Comments	NDP Response	Action Taken
	Important Views		valued by residents are protected insofar as is reasonably practical by policies, WE01 – Environmental Restrictions on Development, near the river Wye and associated flood zones" and WH01 – New Housing Development, which in bullet 3 protects the iconic views of Bredwardine Bridge and the River Wye from the footpath running through the orchard from the church to the Bridge.	
	WE04- Renewable Energy	SD2 compliant.	Not required	No change
	WF01- Retention of Existing Recreational Facilities	SC1, OS3 compliant. Suggested minor wording amendment in italics for clarity: “Any development proposal likely to negatively affect, <i>or result in the loss of</i> , the existing <i>community and</i> recreational facilities will not be permitted.”	Change added	Text now reads: “Any development proposal likely to negatively affect, or result in the loss of, the existing community and recreational facilities will not be permitted;”
	WF02- Picnic Areas, Improving Footpaths, and	OS1, OS2, E4 compliant.	No change	Not required



Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
	Access to the River Wye			
	WF03- Additional Community and Recreational Facilities	SC1, OS1, OS2 compliant.	No change	Not required
	Section 4 - Housing	Other comments/conformity issues: The plan goes into great detail in places over what type of development is to be sought. However, in some cases this results in policies that can be seen as too prescriptive, that could hamper development proposals coming forward. It may also make it difficult to obtain the desired contributions from developers for infrastructure that would support and benefit the local community.	Agreed	<p>The following policy changes have been made to the plan to address these concerns:</p> <p>WH01 – bullet 4: “That there is a preferred maximum of five dwellings per development site in Moccas, two dwellings per site in the smaller villages of Blakemere and Tyberton, and up to ten dwellings in the larger villages of Bredwardine and Preston-on-Wye, (for the purposes of addressing the need for affordable housing and receiving contributions from developers for infrastructure) whilst maintaining the scale and feel of the village centres;”</p> <p>New Policy WH02 – Ensuring an appropriate Range of Tenures, Types and Size of Houses</p> <ul style="list-style-type: none"> <li>• All proposals for new housing development are encouraged to produce an appropriate mix of tenures, types and size of houses that reflect the needs of Wyeside;</li> <li>• In the larger villages of Bredwardine and Preston-on-Wye where sites of up to ten dwellings are supported, a mix of tenures, types and sizes</li> </ul>

# Wyeside NDP 2011 – 2031: Consultation Statement

Regulation 14 – Stakeholder Consultation				
Stakeholder		Stakeholder Comments	NDP Response	Action Taken
		There are also a few other points of clarity which have been flagged up in the comments.	Plan updated as appropriate from comments to improve clarity	must be provided including affordable houses and should integrate these latter houses and market houses across a site:  See actions above
Transportation and Highways	Section 3 – Employment and Demographics	<b>Promote sustainable tourism</b> Bredwardine and Bridge Sollars are the next river crossings west of Hereford and provide a natural confluence of public rights of way and quiet lanes. Between them there is potential for establishing a substantial section of a long distance cycle route between Hereford and both the National Cycle Network at Hay-on-Wye as well as feeding into the northern end of the Golden Valley. At the eastern end routes from Kingstone / Madley and Bridge Sollars link to Preston-on-Wye, then via Moccas, the route continues to Bredwardine where the river crossing offers potential to link with a similar route north of the river.	Promote Sustainable Tourism added as a new employment objective.	Full text added as Section 3.7 of the plan.
	Policy WB01	Item: 2. Be accessible by a choice of transport modes with pedestrian <i>and cycle</i> access within a reasonable walking <i>or cycling</i> distance from one of the Wyeside villages, and;	Text updated	Text in italics added.
	Section 4 – Housing Policy WH01	Where the number of dwellings per site is three or more, up to the maximum of five, a slip road running parallel to the passing road and separated by a grass verge and/or hedge will be permitted to provide a single point of access and maintain the single plot depth above, and;	This policy has been replaced by RIBA best practice for village design which employs organic clusters of houses.	WH01 – bullet 5 updated: “That new housing reflects the character of the village and surrounding environment and development sites of three houses or more should adopt the RIBA 2016 “best practice” design approach. This requires

Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
		<p><i>This appears to conflict with HC Design Guide, need to refer to HCDG, access to be at 90 degrees to carriageway with suitable visibility in as required by the actual speed of the road.</i></p> <p>That safe vehicular access and adequate off road parking can be achieved, and;  <i>Provisions are included that encourage active travel as a preferred mode of transport,</i></p> <p>Include:  <i>Provisions are included that encourage active travel as a preferred mode of transport;</i></p>	<p>Text updated to include requirement for access lanes to be 90 degrees to the carriageway.</p> <p>Text in italics added as bullet 9.</p> <p>Text in italics added as bullet 7.</p>	<p>small organic clusters of houses to be built off new access lanes <b>at 90 degrees to the carriageway</b>, with linked pathways to the rest of the village, to enable residents to maintain and develop communities within an environment that is physically connected;</p> <p>Bullet 9: “That provisions are included that encourage active travel as a preferred mode of transport;”</p>
	Policy WH04	<p>Include:  <i>Provisions are included that encourage active travel as a preferred mode of transport;</i></p>	<p>Text in italics added as bullet 7.</p>	<p>Bullet 7: “That provisions are included that encourage active travel as a preferred mode of transport;”</p>
	Policy WHD01	<p>Include:  <i>Provisions are included that encourage active travel as a preferred mode of transport;</i></p>	<p>Text in italics added as bullet 12.</p>	<p>Bullet 12: “That provisions are included that encourage active travel as a preferred mode of transport;”</p>
	Recreational facilities – footpaths, bridle paths and picnic areas (p39)	<p>One of the joys of living in the area is the potential access to walking <i>and cycling</i> in the countryside.</p>	<p>Text in italics added to sentence on page 39.</p>	<p>One of the joys of living in the area is the potential access to walking and cycling in the countryside.</p>
	6.5 Transport	<p>Other than the B4352, set out below, during a cycle race, most of the network is single track.  <i>However, traffic levels on the quieter lanes make them attractive to cycle tourists as long distance leisure routes,</i></p>	<p>Text in italics added to section 6.5.</p>	<p>Section 6.5 new paragraph: “However, traffic levels on the quieter lanes make them attractive to cycle tourists as long distance leisure routes, particularly with the parishes’ proximity to popular</p>

Regulation 14 – Stakeholder Consultation				
Stakeholder		Stakeholder Comments	NDP Response	Action Taken
	6.7 Planning for New/Improved Facilities and Services	<p><i>particularly with the parishes' proximity to popular tourist destinations such as Hereford, Hay-on-Wye and the Golden Valley.</i></p> <p>Reference to cycle racks on buses please note - <i>External racks on the front of buses are currently not permitted by DfT – these would have to be internal (i.e. at the initiative of the operator) or carried in a trailer (e.g. Cardiff - Brecon summer buses).</i></p>	Text in italics added to section 6.7. subtitle: Transport Services	<p>tourist destinations such as Hereford, Hay-on-Wye and the Golden Valley”.</p> <p>“External bicycle racks on the front of buses are not currently permitted by DfT – but bicycles could be stored internally (i.e. at the initiative of the operator) or carried in a trailer (e.g. Cardiff - Brecon summer buses), and bike hire stations could stimulate tourism.”</p>
Environmental Health	<p>WH01 – New Housing Development</p> <p>Section 5 – Environment and Heritage</p>	<p><b>Environmental Health (Environmental Protection – noise/air)</b></p> <p>Our comments are with reference to the potential impact on the amenity – in terms of noise, dust, odours or general nuisance to residential occupants that might arise as a result of any new residential development and also the impact of existing activities that might have a potential impact on the amenity of new residential properties.</p> <p>We have no objections to the housing objectives proposed but have a suggested amendment to the Housing Policy.</p> <p>WH01 New Housing Development in relation to amenity.</p> <p>Our suggestion is that the policy which specifies criterion for new housing development be expanded to state ‘that there is no adverse impact on the environment or privacy or amenity of neighbours, <i>nor should there be adverse impact on future residential occupants from existing development</i>’</p> <p><b>Environmental Health (Environmental Protection – contaminated land)</b></p>	Text in italics added.	<p>WH01 bullet 10: “That there is no adverse impact on the environment or privacy or amenity of neighbours, <i>nor should there be adverse impact on future residential occupants from existing development</i>, in so far as is reasonably possible in light of the other requirements of this policy;”</p>

Regulation 14 – Stakeholder Consultation				
Stakeholder		Stakeholder Comments	NDP Response	Action Taken
		<p>Given that no specific sites have been identified in the plan I am unable to provide comment with regard to potential contamination.</p> <p>General Comments</p> <p>Developments such as hospitals, homes and schools may be considered ‘sensitive’ and as such consideration should be given to risk from contamination notwithstanding any comments. Please note that the above does not constitute a detailed investigation or desk study to consider risk from contamination. Should any information about the former uses of the proposed development areas be available I would recommend they be submitted for consideration as they may change the comments provided.</p> <p>It should be recognised that contamination is a material planning consideration and is referred to within the NPPF. I would recommend applicants and those involved in the parish plan refer to the pertinent parts of the NPPF and be familiar with the requirements and meanings given when considering risk from contamination during development.</p> <p>Finally, it is also worth bearing in mind that the NPPF makes clear that the developer and/or landowner is responsible for securing safe development where a site is affected by contamination.</p> <p>These comments are provided on the basis that any other developments would be subject to application through the normal planning process.</p>	<p>Concerns with regard to land contamination noted and included in the plan.</p>	<p>Sentence added at the end of Section 5 – Environment and Heritage. “Note: In circumstances where a proposed development site is affected by contamination the National Planning Policy Framework makes it clear that the developer and/or landowner is responsible for securing safe development.”</p>
Ward Councillor and member of	Policy WH01 – New	Original text in draft plan:	Agreed.	New wording:

# Wyeside NDP 2011 – 2031: Consultation Statement

Regulation 14 – Stakeholder Consultation				
Stakeholder	NDP Reference	Stakeholder Comments	NDP Response	Action Taken
Wyeside NDP Steering Committee	Housing Development	<p>Policy WH01, bullet 2 extract reads: <i>“For the avoidance of doubt, where land on the opposite side of the road from a building designated as the centre of a village is a green space (no houses having been built in that location) no housing development will be allowed in that area. By way of example, this means no development will be allowed in the orchard opposite the Red Lion Hotel in the Bredwardine village centre, east of the B4352, or the green spaces between the orchard and the west bank of the river Wye;”</i></p> <p>Comment: This shouldn’t be the eventual policy wording otherwise village centres will change by definition. Whilst the point was referring to Bredwardine and specific fields to be protected, as a policy it would have a different meaning. For instance, in the same minutes Moccas cross was identified as a centre of Moccas. Applying the same logic would mean land adjacent, not currently built on would be protected. I think that the same policy would prevent the land behind the memorial at Bredwardine being developable even though it was discussed at length in the meeting that develop could take place. If any policy states clearly what can or can’t happen, then the policy will apply everywhere within the plan area. I would also suggest that the difference between “open space” to be protected and “public open space” to be protected are distinguished. They are different and would need contracts to prove acceptance!</p>	Policy WH01 - bullet 2 extract has been deleted and replaced with wording that is specific to Bredwardine, reference comments from Bredwardine and Brobury PCC above.	“Notwithstanding the requirement for development to take place contiguous to village centres, development is specifically excluded in the Bredwardine orchards on either side of Church Lane. This being the orchard ‘opposite the Red Lion’ village centre, and the orchard bordered by Church Lane, the River Wye and the road running from the Red Lion to Bredwardine Bridge. In addition, the iconic views of Bredwardine Bridge and the River Wye from the footpath running through the orchard from the church to the bridge are protected from any form of development;”

**APPENDIX 3: REGISTER OF CORRESPONDENCE FOR  
REGULATION 14 CONSULTATION**

Draft



## Register of Correspondence for Regulation 14 Consultation

The email sent out to Statutory Consultees is set out below:

“To Whom it may concern,

In compliance with Regulation 14 requirements for consultation with stakeholders please find attached the Wyese Parishes (Blakemere, Bredwardine, Moccas, Preston-On-Wye and Tyberton) Draft Neighbourhood Plan, together with the Strategic Environment Assessment (SEA) and Habitats Regulation Assessment (HRA) of the plan, for your review and comments as appropriate.

Note: The HRA recommends that additional policy safeguards are required to ensure development does not take place close to the River Wye at Bredwardine. Reference page 22 of the HRA, NDP objective 5. This has been addressed in the attached updated version of the NDP under Policy WH01 – New Housing Development, in the second bullet with the additional wording shown in red: “Ensures the proposal reflects the size, role and function of each village and is contiguous to the village centre(s) so as to not result in free standing, individual or groups of dwellings which are obviously detached from, or peripheral to, the village centres. For the avoidance of doubt, where land on the opposite side of the road from a building designated as the centre of a village is a green space (no houses having been built in that location) no housing development will be allowed in that area. By way of example, this means no development will be allowed in the orchard opposite the Red Lion Hotel in the Bredwardine village centre, east of the B4352, or the green spaces between the orchard and the west bank of the river Wye,”

The six-week public consultation period commences on Monday 16<sup>th</sup> May 2016 and completes on Sunday 26 June 2016. Comments should be sent to the following email address:

[jh.darbyshire@hotmail.com](mailto:jh.darbyshire@hotmail.com).

Thank you for your attention in this matter” ...../ends

### The list of Statutory Consultees emailed were:

**Homes and Communities Agency:** The Government’s housing, land and regeneration agency and regulator of social housing providers in England. They are interested in increasing the numbers of new and affordable homes being built and or made available, and the amount of land being made available for development. Contact details: [mail@homesandcommunities.co.uk](mailto:mail@homesandcommunities.co.uk)

**Natural England:** The Government’s adviser on the natural environment, providing practical scientific advice on how to look after England’s landscapes and wildlife. They will have a view on all Neighbourhood Development Plans. Contact details: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)

**The Environment Agency:** Established to protect and improve the environment and have a statutory duty to support sustainable development. They are responsible for regulating industry and waste, treating contaminated land, water quality and resources, fisheries, inland river navigation and conservation and ecology. Consequently, they will have a view on all Neighbourhood Development Plans. Contact details: [graeme.irwin@environment-agency.gov.uk](mailto:graeme.irwin@environment-agency.gov.uk) and [SHWGPlanning@environment-agency.gov.uk](mailto:SHWGPlanning@environment-agency.gov.uk)

**Historic England:** The public body that looks after England’s historic environment. They are responsible for listing buildings and monuments and provide advice to Government and Local Authorities. They will have a view on all Neighbourhood Development Plans that contain listed buildings or Scheduled Ancient Monuments. Contact details: [west.midlands@HistoricEngland.org.uk](mailto:west.midlands@HistoricEngland.org.uk)

## Wyeside NDP 2011 – 2031: Consultation Statement

---

**English Heritage:** A charity that is responsible for looking after over 400 historic buildings, monuments and sites. They should be consulted if your Neighbourhood Area has one of their properties within it. Contact Details: [customers@english-heritage.org.uk](mailto:customers@english-heritage.org.uk)

**National Trust:** A charity that preserves and protects historic places and spaces across the UK. These include archaeological remains, buildings, gardens, and natural habitats such as woodlands and meadows. Contact details: [mi.customerenquiries@nationaltrust.org.uk](mailto:mi.customerenquiries@nationaltrust.org.uk)

**Wye Valley NHS Trust:** A provider of health services in Herefordshire. They provide community services and hospital care (acute and community) across the County as well as urgent and elective care to more than 40,000 people in mid-Powys. Contact details: [john.burnett@wvt.nhs.uk](mailto:john.burnett@wvt.nhs.uk)

**Dwr Cymru Welsh Water:** Provide all the water supply infrastructure across large parts of the County, from collection, storing, purifying, distribution through the mains network, and disposal through the sewerage system. Dwr Cymru Welsh Water will have a view on all Neighbourhood Development Plans so will need to be one of your statutory consultees. Contact details: [forward.plans@dwrcymru.com](mailto:forward.plans@dwrcymru.com)

**Campaign to Protect Rural England:** Campaign organisation lobbying on behalf of “a beautiful and living countryside”. Would be interested to be consulted on your Neighbourhood Development Plan. Contact details: <http://www.cpreherefordshire.org.uk/contact-us.aspx>

**Hereford and Worcester Chamber of Commerce:** A not for profit organisation that supports the local business community and has a network of 1400 member businesses. They lobby to make sure the interests of local businesses are heard. contact details: [goodbusiness@hwchamber.co.uk](mailto:goodbusiness@hwchamber.co.uk)

**Woodland Trust:** A national charity that works to influence others who are in a position to improve the future of native woodlands. They own over 1000 woods across the UK. Would be particularly interested to be consulted on any matters related to these sites or woodlands as a whole within your Neighbourhood Development Plan. Contact details: [justinmilward@woodland-trust.org.uk](mailto:justinmilward@woodland-trust.org.uk)

**Herefordshire Nature Trust:** The largest membership-based wildlife organisation in the County. It is dedicated to inspiring people about wildlife, being a champion on its behalf and creating or protecting wildlife havens. Contact details: [enquiries@herefordshirewt.co.uk](mailto:enquiries@herefordshirewt.co.uk)

The Wyeside web details for Regulation 14 were published in the Wyeside NDP Consultation Statement on page 14, and is set out below:

**Wyeside Neighbourhood Plan**

Dear Parishioner,

This newsletter is to keep you updated with progress on the Wyeside Parishes (Blakemere, Bredwardine, Moccas, Preston-On-Wye and Tyberton) Neighbourhood Plan...and progress there most certainly has been! After a couple of years of public events, questionnaires and analyses and seemingly endless meetings, the draft plan is ready for public scrutiny and for you to make constructive comments. Have we got some of our 'facts' wrong? Have we missed anything of importance out (within the remit of the plan?) Even the odd spelling correction?

The Neighbourhood Plan is the result of your responses to the questionnaire returns from last summer. They have been very carefully analysed (you can see the analysis in the appendices of the plan) and interpreted within the vision statement of the steering committee:

*To ensure that the special characteristics of the villages within the five Parishes that residents know and love, including their rural feel, historic buildings and relationship with the surrounding countryside, are enhanced and protected.*

- To promote and encourage small businesses and employment for local people.*
- To recognise that modest change can be desirable when there is positive planning to support managed development of a type that is both sustainable and of an appropriate scale.*

The six-week public consultation period on the Draft Wyeside Group Parish Council Neighbourhood Plan will start on 16<sup>th</sup> May. **The document can be viewed** at and downloaded from <http://www.bredwardine-brobury.org.uk> as a .pdf file. Full colour paper copies will also be available for perusal in each of the village halls, in each village's church and at the Red Lion and Yew Tree pubs.

Black & white paper copies of the plan can be requested from Martin Winrow: 01981 501113 or email: [mwgrnh@waitrose.com](mailto:mwgrnh@waitrose.com)

Should you wish to question, comment on, feedback on or suggest improvements to the draft then please send them by email, to [jh.darbyshire@hotmail.com](mailto:jh.darbyshire@hotmail.com)

Alternatively, you can leave comments wherever full colour paper copies of the plan are on view.

The draft plan has also been sent to a number of bodies (e.g. the Environment Agency) for their comments and input.

As well as all these comments and suggestions, another major part of the public scrutiny process will be a **public meeting on Thursday 9<sup>th</sup> June at Moccas Village Hall** 7.00pm for a 7.30pm start. This meeting is open for all Wyeside residents and the Steering Committee will try to answer any question you may have about the plan. There will be a presentation and refreshments will be served. Changes to the draft plan may well be made due to your feedback and will be updated online. **Finally, there will be a council-run, election-style day of voting** on whether or not to officially adopt the plan. If the majority of residents who turn out to vote wish to adopt the plan then it will be submitted to Herefordshire County Council for final approval and so let it become part of the planning laws for this area.

Please get involved: have a read through the document (you don't necessarily have to read every single page); send comments if you think they will help improve the plan; come to the public meeting and VOTE when the time comes (we will let you know 'when' closer to the event...HCC decides the exact day.)

Yours faithfully,

The Wyeside Parishes Neighbourhood Plan Steering Committee

The list of responders to Regulation 14, were as follows:

## Wyese NDP 2011 – 2031: Consultation Statement

---

**To:** Moccas Resident

**Sent:** 20 May 2016 15:50

**To:** John Darbyshire <jc.darbyshire@gmail.com>

**Subject:** RE: Neighbourhood Plan Referendum - postal voting

You're a star, John, thank you very much

With best wishes

**From:** John Darbyshire [<mailto:jc.darbyshire@gmail.com>]

**Sent:** Friday, May 20, 2016 3:28 PM

**To:** Moccas Resident

**Subject:** FW: Neighbourhood Plan Referendum - postal voting

Hello \_\_\_\_\_

In answer to your question on postal voting for the Wyese NDP referendum please see the email below from Hereford Council.

Best wishes

John

John Darbyshire

The Greens, Bredwardine

Herefordshire HR3 6BZ

tel: 01981 500711

mob: 07793 158538

email: [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)

Sent from my smart phone

Dear all

Please see confirmation of the process of postal votes for NDP referendum as discussed at the last meeting.

Thank you

Kind regards

Alison

Sent from AOL Mobile Mail

On 8 May 2016 10:07 pm, Moccas Resident wrote:

Hello

I've been looking through the Wyese Neighbourhood Plan - it's a tremendous piece of work and a huge vote of thanks is due, to the comparatively few individuals concerned, for the time and effort they've put into this on behalf of us all.

We will be on holiday at the time of the public meeting otherwise we would definitely have attended.

## Wyeside NDP 2011 – 2031: Consultation Statement

---

I don't think on first sight that we have any questions to raise on the plan itself, but would have been interested to hear others' comments anyway. Presumably there will be some feedback via the parish magazines?

A question I do have concerns the voting day, which occurred to me because we are away for the public meeting day. Will it be possible to include postal or proxy voting to allow for anyone being away that day?

Apart from that I spotted one small spelling error:

page 32, item 6.7, para 4, 3rd line should read "...where their location is..."

Thanks again

Best wishes

Moccas Resident

----- Forwarded message -----

From Bredwardine with Brobury PCC

Date: 13 Jun 2016 4:16 pm

Subject: Wyeside Neighbourhood Plan

To: "[jh.darbyshire@hotmail.com](mailto:jh.darbyshire@hotmail.com)" <[jh.darbyshire@hotmail.com](mailto:jh.darbyshire@hotmail.com)>

Cc:

Dear John

Please see the attached response to the regulation 14 consultation. I should be grateful if you would acknowledge receipt.

Yours sincerely

Treasurer

**Bredwardine with Brobury Parochial Church Council.**

Dear Sir,

**Wyeside Neighbourhood Plan – Regulation 14 Consultation.**

Bredwardine with Brobury PCC ( the PCC ) is responsible for St Andrew's Church and churchyard in Bredwardine. The PCC welcomes the Wyeside Neighbourhood Plan and its intent to safeguard the character of the area and individual villages. The PCC also notes and supports the value placed on the environment, historic buildings and views within the neighbourhood plan area.

The PCC believes that it is important to protect the immediate surroundings of the historic buildings in the plan area as well as the buildings themselves. Where possible, specific reference should be made to any surrounding land which will be protected.

The worshipping community and visitors to St Andrew's Church Bredwardine greatly value the peace and tranquillity afforded by its setting near the River Wye, surrounded by orchards. The PCC wish to ensure that the character of the setting is maintained. The plan attempts to limit development in Bredwardine by defining the village centre and excluding development as follows:

*For the avoidance of doubt,*



## Wyeside NDP 2011 – 2031: Consultation Statement

---

*where land on the opposite side of the road from a building designated as the centre of a village is a green space (no houses having been built in that location) no housing development will be allowed in that area. By way of example, this means no development will be allowed in the orchard opposite the Red Lion Hotel in the Bredwardine village centre, east of the B4352, or the green spaces between the orchard and the west bank of the river Wye, and*

The PCC requests that the policy is amended to specifically exclude development in the orchards on either side of Church Lane this being the orchard referred to as 'opposite the Red Lion' and the orchard bordered by Church Lane, the River Wye and the road running from the Red Lion to Bredwardine Bridge.

The PCC also requests that there is specific protection of the iconic views of Bredwardine Bridge and the River Wye from the footpath running from the church to the bridge.

Yours sincerely,  
Treasurer

**From:** John Darbyshire [mailto:jc.darbyshire@gmail.com]  
**Sent:** 15 June 2016 17:13  
**To:** PCC  
**Cc:** Samoyedskye@aol.com  
**Subject:** RE: Wyeside Neighbourhood Plan

Hello \_\_\_\_\_

I have registered your letter in the responses file (copy included here for our Chairperson) and will raise it with the NDP steering committee meeting this evening. I think it would be a good idea if we could meet at the bridge to review your concerns, particularly as it relates to the protection of views.

Can you come back to me with a couple of dates and times that would suit you?

John

**From:** PCC  
**Sent:** 16 June 2016 19:29  
**To:** 'John Darbyshire'  
**Subject:** RE: Wyeside Neighbourhood Plan

Hi John

I will see you at 7.30 pm on Monday.

Best regards

Treasurer

Following the site meeting it was agreed with the WGPC that the proposed wording in the letter from Bredwardine with Brobury Parochial Church Council would be included in the plan.

**Historic England**

# Wyese NDP 2011 – 2031: Consultation Statement

---

----- Forwarded message -----

From: "Neighbourhood Planning Team" <[neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk)>

Date: 14 Jun 2016 11:30 am

Subject: FW: Historic England advice on case PL00022460

To: "jh.darbyshire@hotmail.com" <[jh.darbyshire@hotmail.com](mailto:jh.darbyshire@hotmail.com)>

Cc: "A Wright ([Samoyedskye@aol.com](mailto:Samoyedskye@aol.com))" <[Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)>

Hi

I am forwarding on this consultation response from Historic England regarding the Wyese Group Regulation 14 NDP to yourselves just in case it hasn't been sent to you directly.

Kind regards

James Latham  
Neighbourhood Planning Team  
Herefordshire Council

-----Original Message-----

From: [peter.boland@HistoricEngland.org.uk](mailto:peter.boland@HistoricEngland.org.uk) [mailto:[peter.boland@HistoricEngland.org.uk](mailto:peter.boland@HistoricEngland.org.uk)]

Sent: 14 June 2016 09:56

To: Neighbourhood Planning Team

Cc: [Susan.SMITH@HistoricEngland.org.uk](mailto:Susan.SMITH@HistoricEngland.org.uk)

Subject: Historic England advice on case PL00022460

Dear James

I am writing to notify you of the following Places module case:

NDP: Neighbourhood Development Plan  
Wyese Group Draft NDP  
[Case Ref. PL00022460; HE File Ref. HD/P; Your Reference. .]

Main body of email

Yours Sincerely

Peter Boland  
Historic Places Advisor  
E-mail: [peter.boland@HistoricEngland.org.uk](mailto:peter.boland@HistoricEngland.org.uk)  
Direct Dial: 0121 625 6887

We are the public body that looks after England's historic environment. We champion historic places, helping people to understand, value and care for them, now and for the future.

Sign up to our newsletter to keep up to date with our latest news, advice and listings.

[HistoricEngland.org.uk](http://HistoricEngland.org.uk)      Twitter: @HistoricEngland

Mr James Latham Direct Dial: 0121 625 6887

Herefordshire Council

Neighbourhood Planning & Strategic Planning      Our ref: PL00022460

Planning Services, PO Box 230, Blueschool House



# Wyeside NDP 2011 – 2031: Consultation Statement

---

Blueschool Street

Hereford

HR1 2ZB 14 June 2016

Dear Mr Latham

WYESIDE NEIGHBOURHOOD PLAN - REGULATION 14 CONSULTATION

Thank you for the invitation to comment on the Wyeside Neighbourhood Plan. Historic England is supportive of both the content of the document and the vision and objectives set out in it.

The emphasis on the conservation of local distinctiveness and the protection of locally significant buildings and landscape character including archaeological remains and important views is to be applauded.

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.

I hope you find these comments and advice helpful. If you have any queries please do not hesitate to contact me.

Yours sincerely,



Peter Boland

Historic Places Advisor

peter.boland@HistoricEngland.org.uk

cc:

Responses published in the Wyeside NDP Consultation Statement.

## Natural England

----- Forwarded message -----

From: "Consultations (NE)" <[consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)>

Date: 15 Jun 2016 11:50 am

Subject: RE: Wyeside Group draft Neighbourhood Development Plan

To: "[jh.darbyshire@hotmail.com](mailto:jh.darbyshire@hotmail.com)" <[jh.darbyshire@hotmail.com](mailto:jh.darbyshire@hotmail.com)>

Cc: "[neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk)" <[neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk)>

For the attention of Ms Wright,

Wyeside Group Neighbourhood Development Plan - Draft Plan

Please find Natural England's response in relation to the above mentioned consultation attached herewith.

We welcome your feedback on Natural England's revised standing advice. Please provide comments and suggested improvements regarding usability, quality of content and its clarity and effectiveness as a tool in guiding decision-making using the text box on the attached customer feedback form. Alternatively email your feedback directly to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)

# Wyese NDP 2011 – 2031: Consultation Statement

---

Kind regards,

Victoria Kirkham

Consultations Team

Natural England

County Hall

Spetchley Road

Worcester WR5 2NP

15 June 2016 Our ref: 185922 Your ref: Wyese Group Neighbourhood Development Plan

Ms Alison Wright Clerk to Wyese Group Parish Council

BY EMAIL ONLY [jh.darbyshire@hotmail.com](mailto:jh.darbyshire@hotmail.com)

Copy to: [neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk)

Hornbeam House Crewe Business Park Electra Way Crewe Cheshire CW1 6GJ

T 0300 060 3900

Dear Ms Wright,

Wyese Group Neighbourhood Development Plan - Draft Plan

Thank you for your consultation on the above dated 16/05/2016.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

**Natural England does not have any specific comments on this draft neighbourhood plan.**

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely,

Victoria Kirkham Consultations Team

Responses published in the Wyese NDP Consultation Statement.

**Environment Agency**

## Wyeside NDP 2011 – 2031: Consultation Statement

---

----- Forwarded message -----

From: "Neighbourhood Planning Team" <[neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk)>

Date: 24 Jun 2016 2:12 pm

Subject: FW: Wyeside Group draft Neighbourhood Development Plan

To: "A Wright ([Samoyedskye@aol.com](mailto:Samoyedskye@aol.com))" <[Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)>

Cc: "[jh.darbyshire@hotmail.com](mailto:jh.darbyshire@hotmail.com)" <[jh.darbyshire@hotmail.com](mailto:jh.darbyshire@hotmail.com)>

Hi Alison

Please find attached another consultation response for the Wyeside Group Reg 14 NDP.

Kind regards

James Latham

Technical Support Officer

Neighbourhood Planning, Strategic Planning & Conservation teams

Herefordshire Council

Planning Services

PO Box 230

Blueschool House

Blueschool Street

Hereford

HR1 2ZB

Tel: 01432 383617

Courier code : H31

Email: [jlatham@herefordshire.gov.uk](mailto:jlatham@herefordshire.gov.uk)

[neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk) (for Neighbourhood Planning enquiries)

[ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk) (for Strategic Planning enquiries)

Web: [www.herefordshire.gov.uk/neighbourhoodplanning](http://www.herefordshire.gov.uk/neighbourhoodplanning) (Neighbourhood Planning)

[www.herefordshire.gov.uk/local-plan](http://www.herefordshire.gov.uk/local-plan) (Strategic Planning)

[www.herefordshire.gov.uk/conservation](http://www.herefordshire.gov.uk/conservation) (Conservation)

From: Irwin, Graeme [mailto:[graeme.irwin@environment-agency.gov.uk](mailto:graeme.irwin@environment-agency.gov.uk)]

Sent: 24 June 2016 14:00

To: Neighbourhood Planning Team

Subject: RE: Wyeside Group draft Neighbourhood Development Plan

Good afternoon James.

I have attached a copy of my response to the Wyeside Draft Neighbourhood Plan submission.

Regards.

# Wyeside NDP 2011 – 2031: Consultation Statement

---

Graeme Irwin

Senior Planning Officer - Sustainable Places

Shropshire, Herefordshire, Worcestershire and Gloucestershire

Environment Agency

Direct Dial: 02030 251624

Direct email: [graeme.irwin@environment-agency.gov.uk](mailto:graeme.irwin@environment-agency.gov.uk)

Our ref: SV/2010/103979/AP61/IS1-L01 Your ref:

Date: 24 June 2016

Dear Sir

WYESIDE DRAFT NEIGHBOURHOOD PLAN

I refer to your email of the 16 May 2016 in relation to the above Neighbourhood Plan (NP) consultation. We have reviewed the submitted document and would offer the following comments at this time.

As part of the recently adopted Herefordshire Council Core Strategy updates were made to both the Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS). This evidence base ensured that the proposed development in Hereford City, and other strategic sites (Market Towns), was viable and achievable. The updated evidence base did not extend to Rural Parishes at the NP level so it is important that these subsequent plans offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period.

As stated within the submitted plan this area is impacted by fluvial flooding from the River Wye (SAC) and its tributaries. We welcome Environmental Objective 7 and its associated Policy WE01 (Environmental Restrictions on Development).

Whilst we welcome reference to flood risk within the plan we would not, in the absence of specific sites allocated within areas of flooding, offer a bespoke comment at this time. You are advised to utilise the attached Environment Agency guidance and pro-forma which should assist you moving forward with your Plan.

I trust the above is of assistance at this time. Please can you also copy in any future correspondence to my team email address at [SHWGPlanning@environmentagency.gov.uk](mailto:SHWGPlanning@environmentagency.gov.uk)

Yours faithfully

Mr. Graeme Irwin Senior Planning Advisor Direct dial: 02030 251624 Direct e-mail:  
[graeme.irwin@environment-agency.gov.uk](mailto:graeme.irwin@environment-agency.gov.uk)

Responses published in the Wyeside NDP Consultation Statement.

## Wyeside Resident Visit to RIBA Exhibition

**From:** John Darbyshire [mailto:[jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)]

**Sent:** 18 June 2016 12:41

# Wyeseide NDP 2011 – 2031: Consultation Statement

---

**To:** Wyeseide Resident  
**Cc:** Samoyedskye@aol.com  
**Subject:** RE: Neighbourhood Plan and RIBA input

Hello \_\_\_\_\_

Your comments at the consultation meeting and presentation on Thursday 9/06, stimulated an interesting debate at the NDP Steering Committee last Wednesday 15/06 and it was agreed that we would explore options for incorporating your ideas and others on village layouts into the plan.

Your comments from the RIBA exhibition provided to Alison and below will also be included in the discussion.

We will report back to you once the Steering Committee has drafted and reviewed some possible outcomes for inclusion in the plan.

Thank you for volunteering your ideas at the consultation meeting and your findings from the RIBA exhibition.

Best Wishes

John Darbyshire

----- Forwarded message -----

**From:** Wyeseide Resident  
**Date:** 17 Jun 2016 4:49 pm  
**Subject:** Fwd: Neighbourhood Plan and RIBA input  
**To:** "[jh.darbyshire@hotmail.com](mailto:jh.darbyshire@hotmail.com)" <[jh.darbyshire@hotmail.com](mailto:jh.darbyshire@hotmail.com)>  
**Cc:**

Dear John,

Thank you to you and the team for all your hard work to-date on the neighbourhood plan. Kate and I very much enjoyed meeting you last Thursday and hearing the presentation made by Andrew.

We wanted to send some input to you following that presentation, which we have already shared with Alison:

At the meeting last Thursday there was much discussion about village design, especially where there are clusters of up to 5 houses. On Wednesday we visited an exhibition at RIBA (Royal Institute of British Architects) in London titled "At Home in Britain: Designing the House of Tomorrow". Part of the exhibition focused on village design; best practices and lessons learned from past mistakes. We thought it would be useful input to the neighbourhood plan. We took some photos of the sections that related to village design in particular (please excuse quality of some of the photos as we only had our phone camera). I will try and highlight the messages with a few of the photos in this email.

Part of the exhibit talked about mistakes made in planning housing after the war in the '50s. Two examples were given (a row of houses along a road, and another row where there was a parallel slip road). Our concern here is that, as our draft plan is currently written, a developer could build up to 5 houses in a row. extending the villages in a number of directions along existing roads, and in a rather suburban way without enhancing the village feel. For example, the current document explicitly says "Requiring housing development to take place in a way that is contiguous to the centre of a village means; houses forming a line or ribbon of development either connected to or in close proximity to each other and to the centre of the village". In this case a developer will be following the mistakes of past design as in the photo. We should be thinking about side lanes with small organic clusters of

## Wyeseide NDP 2011 – 2031: Consultation Statement

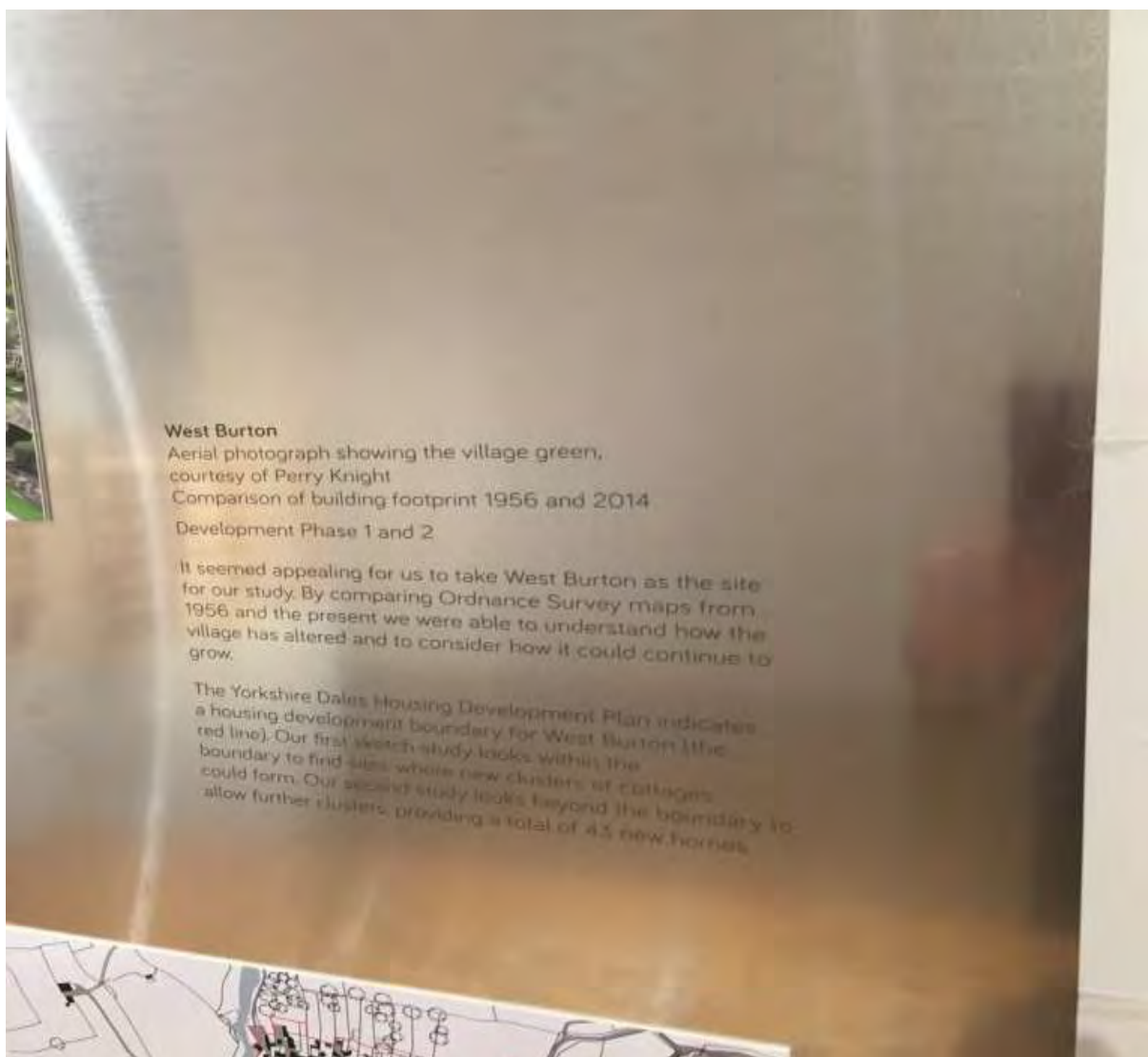
---

houses rather than formal “cut-de-sacs”. Slip road ribbon development, especially where hedges and trees are not maintained, are eyesores at worst or bland patches of grass at best. If the current village hedges are left (which they should be for the sake of the environment and history) and a slip road was built behind the hedge, then this would encourage crime as properties would not be overlooked. Organic clusters off side lanes with interesting pedestrian lanes that connect clusters with other parts of the village is the recommended approach. We should also be protecting existing hedges and veteran trees in the villages in any new development. By building along existing roads this will not be achieved.

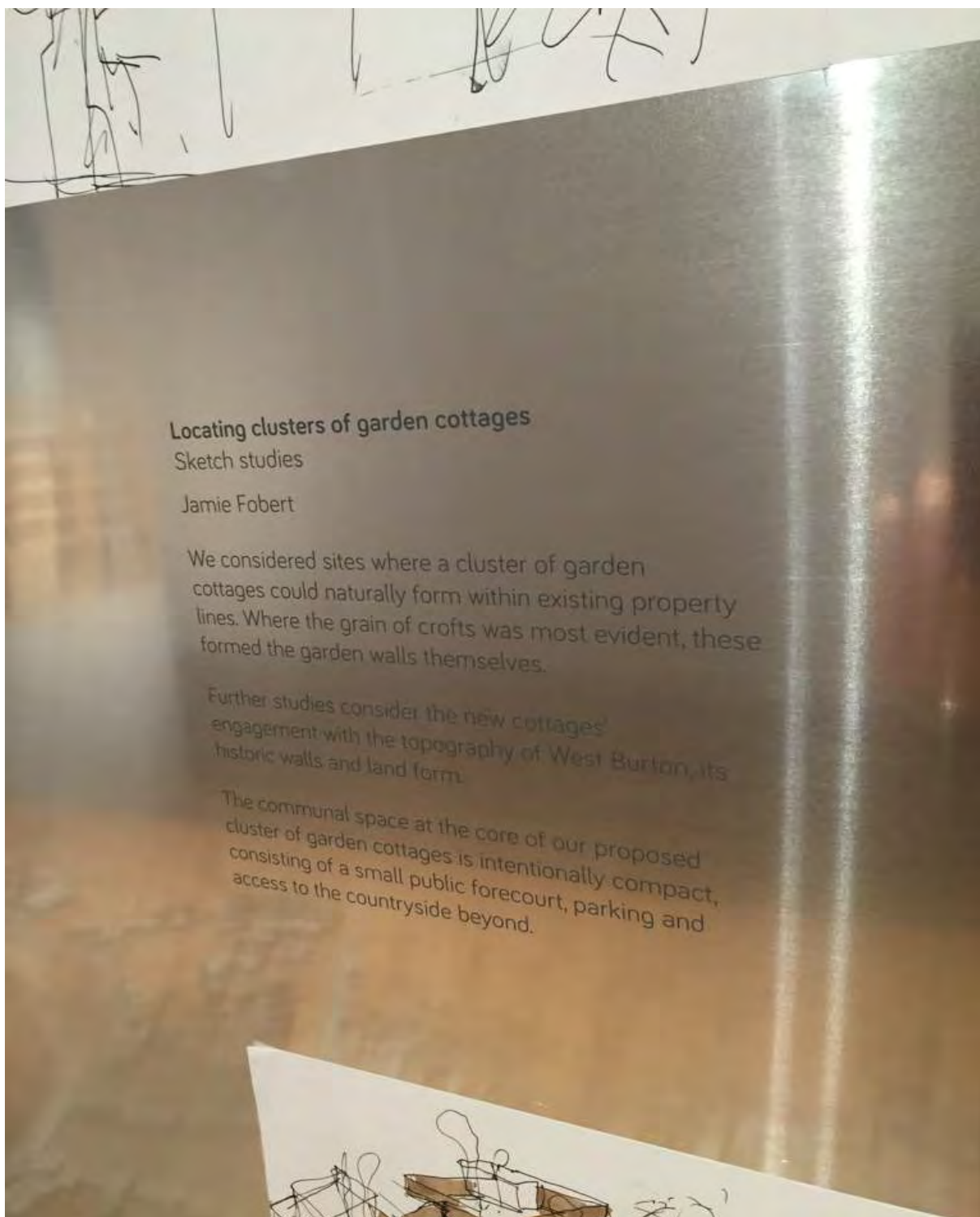


As mentioned, the best practice proposal from the RIBA exhibition is to cluster small groups of houses and to make the use of the land behind existing road frontages in a sympathetic way using side lanes that exploits the beauty of the surrounding countryside and utilises side lanes to create the organic clusters, minimising hard forecourts and maximising concepts like walled cottage gardens where appropriate. It also suggested that natural half hedges were preferable to closed board panel fences along the boundaries of developments to soften the impact on the villages.

I have included some photos below about a project at West Burton in Yorkshire:









The other notable fact is that only 6% of houses built in the UK are currently built using an architect. Last weekend we went to look at the cluster of new houses that have been built in the centre of Madly on the main crossroads opposite Londis. I have no idea if an architect was used, but the tiny gardens, close proximity of the houses, close board fencing everywhere (right up to roadside) and overuse of tarmac, does not appear to be sympathetic to a village environment (only one house in the development I believe has sold after a year). I think it is important we get this right in our plan to ensure that the villages expand in a way that enhances the community. One point on cost: the relative additional costs for a developer of engaging an architect and of putting in a side lane is relatively small compared to the development price, so a developer should not be using cost as an excuse for poor design.

We would suggest the following for consideration by the committee in the neighbourhood plan:

- 1) Replacing the reference to contiguous ribbon development with a form of words that state any multi-house development (i.e. more than one house) is built in an organic cluster design off a new access lane to any existing roads.
- 2) Emphasis should be given to a sufficient natural garden space rather than hard standing cover, and with natural low hedge borders rather than close panel fences.
- 3) House design is sympathetic to the vernacular of the current architecture of the villages (think this one may already be covered in design) and an architect should be engaged on new developments .

## Wyese NDP 2011 – 2031: Consultation Statement

---

In summary, all our villages have evolved since medieval times with farms and organic growth of traditional cottages in the village context, which currently means that most housing across the villages have sizeable front gardens that you can see into from outside. I think most people would agree that we need to maintain this organic open feel rather than allow developers to make the mistakes of the past.

Again we are grateful for all the work done to-date and the great presentation by Andrew last week.

Kind regards

Wyese Resident

again, a reminder of poor post-war design from the exhibition:



From: [Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)

To: Wyese Resident

Sent: 16/06/2016 14:54:40 GMT Daylight Time

Subj: Re: Neighbourhood Plan and RIBA input

# Wyeside NDP 2011 – 2031: Consultation Statement

---

Dear \_\_\_\_\_

Thank you for your comprehensive message and photographs. The input that Kate gave at the meeting last week was discussed last evening, at a Steering Group Meeting. As a direct consequence of the discussion there will be adaptations made to the thinking, in the plan draft, regarding layout design to incorporate ideas as introduced.

If you would like to come along to a future meeting please do let me know and I will send details to you. Your input and ideas would be most welcome.

Thank you

Kind regards

Alison

Responses published in the Wyeside NDP Consultation Statement.

## Welsh Water

----- Forwarded message -----

From: "Norman Ryan" <[Ryan.Norman@dwrcymru.com](mailto:Ryan.Norman@dwrcymru.com)>

Date: 24 Jun 2016 12:50 pm

Subject: Regulation 14 consultation on Wyeside Neighbourhood Plan

To: "[jh.darbyshire@hotmail.com](mailto:jh.darbyshire@hotmail.com)" <[jh.darbyshire@hotmail.com](mailto:jh.darbyshire@hotmail.com)>

Cc: "Evans Rhys" <[Rhys.Evans3@dwrcymru.com](mailto:Rhys.Evans3@dwrcymru.com)>

Dear Sir/Madam,

Re: Regulation 14 consultation on Wyeside Neighbourhood Plan

I refer to the above consultation and would like to thank you for allowing Welsh Water the opportunity to respond.

Please find attached our consultation response.

If you require any further information then please do not hesitate to contact us.

Regards,



Ryan Norman

Forward Plans Officer | Developer Services | Dŵr Cymru Welsh Water

Linea | Cardiff | CF3 0LT | T: 0800 917 2652 | Ext: 40719 | [www.dwrcymru.com](http://www.dwrcymru.com)

FAO Parish Clerk      Enquiries: Rhys Evans/Ryan Norman Wyeside Neighbourhood Plan      0800 917 2652

24th June 2016 Sent via email

Dear Sir/Madam,

# Wyeside NDP 2011 – 2031: Consultation Statement

---

## REGULATION 14 PUBLIC CONSULTATION ON WYESIDE NEIGHBOURHOOD PLAN – JUNE 2016

I refer to your email dated the 8th May 2016 regarding the above consultation. Dŵr Cymru Welsh Water (DCWW) appreciates the opportunity to respond and we offer the following representation:

Given that the Wyeside Neighbourhood Plan (NP) has been prepared in accordance with the Adopted Herefordshire Local Plan Core Strategy, DCWW are supportive of the aims, objectives and policies set out.

We note that there is no specific reference to the capabilities of the public sewerage system or wastewater treatment works (WwTW) to accept the foul flows from the amount of new development proposed, other than the wording under Section 6.5.

As such, we feel that the addition of the following policy (in line with Policy SD4 of the Core Strategy) would provide the assurance that new development will only be permitted where the capacity of the public sewerage network and/or WwTW allows:

**New Policy: Public sewerage network and wastewater treatment works (WwTW)**

Development that may result in the capacity of the public sewerage network and/or the wastewater treatment works (WwTW) at Bredwardine, Moccas and Preston-on-Wye 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 improvements themselves via the provisions of the Water Industry Act (1991) and/or section 106 of the Town and Country Planning Act (1990).

With regard to the housing growth proposed over the NP period, we can confirm the following:

**Bredwardine (10 dwellings)**

**Water supply**

There are no issues in providing a supply of water for the housing growth proposed to Bredwardine, though dependant on the location of development some level of off-site mains may be required.

2

**Sewerage**

There are no issues with the public sewerage network accommodating the level of foul-flows for the housing growth proposed to Bredwardine, though dependant on the location of development some level of off-site sewers may be required.

**Wastewater treatment**

There are no issues with Bredwardine WwTW accommodating the housing growth proposed.

**Preston-on-Wye (10 dwellings)**

**Water supply**



# Wyese NDP 2011 – 2031: Consultation Statement

---

There are no issues in providing a supply of water for the housing growth proposed to Preston-on-Wye, though dependant on the location of development some level of off-site mains may be required.

## Sewerage

There are no issues with the public sewerage network accommodating the level of foul-flows for the housing growth proposed to Preston-on-Wye, though dependant on the location of development some level of offsite sewers may be required.

## Wastewater treatment

There are no issues with Preston-on-Wye WwTW accommodating the housing growth proposed.

## Moccas (8 dwellings)

### Water supply

There are no issues in providing a supply of clean water for the housing growth proposed to Moccas, though dependant on the location of development some level of off-site mains may be required.

### Sewerage

There are no issues with the public sewerage network accommodating the level of foul-flows for the housing growth proposed to Moccas, though dependant on the location of development some level of off-site sewers may be required.

### Wastewater treatment

Moccas WwTW is currently biologically overloaded. There are no improvements planned within the current Asset Management Plan (AMP6 -2015-2020) therefore if a developer wishes to progress a site in advance of our future regulatory investment, they will need to find the improvements themselves via the provisions of a section 106 Agreement (of the Town & Country Planning Act 199).

Alternatively, they may seek the utilisation of alternative drainage methods if practical, under the provisions of Policy SD 4 of the Adopted Core Strategy.

### Other locations

3

### Water supply

Outside of the three above listed settlements, there are no issues in providing a supply of clean water, though dependant on the location of development some level of off-site mains may be required.

### Sewerage/wastewater treatment

There is no public sewerage or wastewater treatment facilities. As such, any new housing growth in these locations will be required to utilise alternative drainage methods, under the provisions of Policy SD 4 of the Adopted Core Strategy.

It is difficult to provide further detail with regard to the capability of our assets to accommodate the level of growth proposed in the Neighbourhood Plan as no sites have been specifically allocated. Therefore, when planning applications are submitted for new housing development within the Neighbourhood Plan area, we will provide consultation responses when consulted by Herefordshire Council.

# Wyeseide NDP 2011 – 2031: Consultation Statement

---

We hope that the above information will assist as the Neighbourhood Plan progresses. In the meantime, should you require any further information please do not hesitate to contact us at Forward.Plans@dwrwymru.com or via telephone on 0800 917 2652.

Yours sincerely,

Ryan Norman Forward Plans Officer Developer Services

Responses published in the Wyeseide NDP Consultation Statement.

## Wyeseide Land Agent

----- Forwarded message -----

From: Land Agent

Date: 19 Jul 2016 12:40 pm

Subject: WYESIDE NEIGHBOURHOOD PLAN - FEEDBACK ON DRAFT PLAN

To: "[jh.darbyshire@hotmail.com](mailto:jh.darbyshire@hotmail.com)" <[jh.darbyshire@hotmail.com](mailto:jh.darbyshire@hotmail.com)>

Cc:

Dear Mr Darbyshire

I am an agent for one of the rural estates within the Wyeseide plan area and I have been asked by my clients to provide you with some feedback, proposals and comments on the wording of the various policies in the draft neighbourhood plan.

My comments for ease of identification are in green and the policies I am commenting on are in blue. These are as follows:

A

### **"5.6 Spatial Strategy – Expansion of Village Centres Only**

*The spatial strategy for new housing developments describes the type of locations that are acceptable, rather than identifying specific development sites, to enable a flexible approach to future requirements. This spatial strategy requires that any new housing development will be contiguous to the centre of each village, or in the case of Preston-on-Wye to the two village centres. This use of village centres only for the incremental management of new housing development is best understood by reference to current housing arrangements. There are eighty three houses in Bredwardine with one centre and a wide scattering. ...*

*For the purposes of housing development the Red Lion Hotel, set out below, represents the centre of the village for Bredwardine....*

*Moccas has fifty six houses with one centre and a fair scattering. For the purposes of housing development the village hall ... represents the centre of the village for Moccas.*

*Requiring housing development to take place in a way that is contiguous to the centre of a village means; houses forming a line or ribbon of development either connected to or in close proximity to each other and to the centre of the village, reference the example diagram in Figure 7 below for a Phase I and II New Housing Development.*

*A spatial area of land with no development adjacent to a village centre; i.e. at the boundary of a contiguous number of houses from the village centre can be used for development as set out in the Phase I diagram above. Once this spatial area has been developed the village centre boundary moves to*



## Wyeseide NDP 2011 – 2031: Consultation Statement

---

*the next available spatial area adjacent to the village centre for possible development as set out in the Phase II diagram. But development of rural areas of the countryside away from these village centres which may have an existing scatter of houses but no contiguous housing connection to a centre will not be permitted".*

Comment - This policy seeks to provide a "...flexible approach to future requirements...". My clients concern is that whereas this policy may be suitable in some villages it is much too rigid a policy to apply across the parishes where very village is different. By way of an example Moccas village has a village hall which in this policy is deemed to be the centre of the village. Applying this policy in Moccas would not be appropriate due to various constraints such as the following:

- a) The adjacent field to the village hall is part of a Grade II\* listed park and garden
- b) The field beyond this running down to the war memorial is an ancient orchard which I would imagine most residents would not consider suitable for development due to its high value as a landscape feature. There is also a more recent orchard at the cross roads by the war memorial.

In villages such as this a less prescriptive policy to housing is required as for the requisite number of houses to be built which allows the community to agree a bespoke policy that suits the individual needs of the village. For instance it might be appropriate for the community to choose one site as a small development rather the type of ribbon development proposed in the plan.

In addition a more flexible policy would help in meeting the policies outlined in WE01/02 and 03.

B

### **"Policy WH01 – New Housing Development**

*Approval of applications for new housing will be, subject to their satisfying all of the following criteria and policy WH02:*

- Demonstrates community support in accordance with the neighbourhood development plan and the requirement for local involvement in decision making, and;*
- Ensures the proposal reflects the size, role and function of each village and is contiguous to the village centre(s) so as to not result in free standing, individual or groups of dwellings which are obviously detached from, or peripheral to, the village centres. For the avoidance of doubt, where land on the opposite side of the road from a building designated as the centre of a village is a green space (no houses having been built in that location) no housing development will be allowed in that area. By way of example, this means no development will be allowed in the orchard opposite the Red Lion Hotel in the Bredwardine village centre, east of the B4352, or the green spaces between the orchard and the west bank of the river Wye, and;*

Comment - As mentioned above I would propose the policy be worded as follows:

*"Ensures the proposal reflects the size, role and function of each village is close to the village centre(s) except in the following circumstances:*

- a) *There is a suitable brownfield site within 1 mile of the village centre*
- b) *The individual characteristics or constraints of the village make development on the edge of the village preferable in terms of landscape and amenity*
- c) *There is no available development land adjacent to the village centre*

## Wyeside NDP 2011 – 2031: Consultation Statement

---

d) *The land adjacent to the village centre can not be developed due to the existence of important green spaces or landscape designations*

*For the avoidance of doubt, where land is **adjacent** to a building designated as the centre of a village is a green space (no houses having been built in that location) no housing development will be allowed in that area. By way of example, this means no development will be allowed in the orchard opposite the Red Lion Hotel in the Bredwardine village centre, east of the B4352, or the green spaces between the orchard and the west bank of the river Wye, and;*

*· That there should be a maximum of five dwellings per development site in the larger villages of Bredwardine, Moccas and Preston-on-Wye and a maximum of two dwellings per site in the smaller villages of Blakemere and Tyberton, to maintain the scale and feel of the village centres, and;*

Comment - I have no objection to the principle of a maximum of five dwellings per development site in these parishes but building 5 dwellings in a row in some of these villages could ruin the character of them.

*· That development provides a mix of predominately two, and three bedroom properties but not wholly to the exclusion of one bedroom homes, where a local need has been identified, or larger homes where a market has been identified, in accordance with policy WH02 below, and;*

*· That new housing is of a single plot depth and fronts directly onto the existing villages' road networks and reflects the character of the village and surrounding environment;*

Comment - This type of prescriptive policy lacks the degree of flexibility that local communities require to ascertain what type and scale of development they require. It might be suitable in some locations but could also have an adverse effect on the character of a village. I would suggest the deletion of this policy as it is more appropriate for suburban planning.

*· Where the number of dwellings per site is three or more, up to the maximum of five, a slip road running parallel to the passing road and separated by a grass verge and/or hedge will be permitted to provide a single point of access and maintain the single plot depth above,*

Comment - This type of ribbon development is inappropriate for some rural villages which may benefit from the development of a small and well landscaped housing development. I would suggest the deletion of this policy as it is more appropriate for suburban planning.

*and;*

*· Relates directly to the existing built form i.e. has the infill character of existing built up frontage, adjacent to or opposite the proposed development, and;*

*· That safe vehicular access and adequate off road parking can be achieved, and;*

*· That there is no adverse impact on the environment or privacy or amenity of neighbours, and;*

Comment - I would suggest the following minor amendment to this policy;

*"That there is no adverse impact on the environment or privacy or amenity of neighbours **in so far as is reasonably possible in light of the other requirements of this policy** ",*

*· That design and materials are in accordance with policy WHD01 below, and;*

*· That gives priority to the development of suitable brownfield sites, and;*

## Wyeside NDP 2011 – 2031: Consultation Statement

---

Comment - Some brownfield sites in and around villages may be just outside the village envelope but capable of absorbing the number of houses that the village is obliged to build. The community needs the flexibility to develop these sites if other sites in and around the village centre and deemed to be less suitable. I would propose the rewording of this policy as follows:

*"That gives priority to the development of suitable brownfield sites **that might be outside the village envelope**"*

- *By contributing to the delivery of an appropriate mix of dwelling types and sizes, including affordable housing, to meet the housing needs of all sectors within Wyeside.*
- *Complies with Wyeside policy WE01 - Environmental Restrictions on Development, below".*

The changes I have proposed would help in meeting the policies outlined in WE01/02 and 03.

### **"Policy WE03 - Protecting Local Green Spaces and Important Views**

*Proposals for all new development will be required to demonstrate that they have regard to the Herefordshire Strategy for Green Infrastructure by:*

- *Protecting and enhancing priority habitats, species, ancient woodlands and archaeological, historical and cultural features, the River Wye as a landscape feature, designated and nondesignated heritage assets, traditional orchards, hedges, the low density dispersed settlement pattern, and rural views, and;*
- *Retain existing open spaces, trees, hedgerows, woodlands, water courses, parks and gardens, and;*
- *Where appropriate providing facilities for recreation and leisure, and;*
- *Incorporating sustainable drainage solutions to reduce risk of flooding, and;*
- *Incorporating landscaping utilising indigenous species.*

*In addition, green spaces, views and vistas valued by residents are protected insofar as is reasonably practical by policies, WH01 – New Housing Development, in particular that any development "is contiguous to the village centre(s) so as to not result in free standing, individual or groups of dwellings which are obviously detached from, or peripheral to, the village centres", and WE01 – Environmental Restrictions on Development, near the river Wye and associated flood zones".*

Comment - To bring this policy in line with my earlier suggestions I would suggest the final bullet point is amended as follows:

*In addition, green spaces, views and vistas valued by residents are protected insofar as is reasonably practical by policies, WH01 – New Housing Development and WE01 – Environmental Restrictions on Development, near the river Wye and associated flood zones".*

I would be happy to meet you or any of the other members on the plan Steering Committee to discuss these proposals if that would be of any assistance at all.

In the meantime I would be most grateful if you could acknowledge receipt of this email and confirm what the closing date for comments on this plan is.

Regards

**Land Agent**  
DIRECTOR



Chester Master Ltd  
Dolgarreg, North Road, Builth Wells, Powys, LD2 3DD  
Tel: [+44 \(0\)1982 553 248](tel:+44(0)1982553248) • Fax: [+44 \(0\)1982 553 154](tel:+44(0)1982553154)

**From:** John Darbyshire [mailto:[jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)]  
**Sent:** 06 October 2016 11:20  
**To:** Owen Whittall <[whittallmoccas@gmail.com](mailto:whittallmoccas@gmail.com)>  
**Cc:** Alison Wright <[samoyedskye@aol.com](mailto:samoyedskye@aol.com)>  
**Subject:** Comments by Land Agents

Hi Owen

I attach a copy of the comments from a Land Agent and Wyeside Resident". So that they can review the Steering Committee responses prior to submission of the NDP to Hereford Council for independent examination.

I also attach a copy of the updated plan which reflects the changes made following the consultation comments.

Let me know if they have any concerns or require further clarification.

Best wishes

John

John Darbyshire

The Greens, Bredwardine

Herefordshire HR3 6BZ

Email: [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)

Tel: 01981 500711

Mob: 07793 158538

A copy of the responses to these questions was extracted from the Wyeside NDP Consultation Statement and sent to the Land Agent and Wyeside Resident. No further comments were received.

## **Wyeside Resident**

**From:** Owen Whittall [mailto:[whittallmoccas@gmail.com](mailto:whittallmoccas@gmail.com)]  
**Sent:** 19 July 2016 14:26  
**To:** John Darbyshire <[jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)>  
**Subject:** Fwd: Development plan

Dear John

## Wyeside NDP 2011 – 2031: Consultation Statement

---

Hope you are well. Wyeside Resident, sent me this email after our open meeting. Apologies for sending this late to you.

A Land Agent has also sent you an email with his comments. He too thinks the idea of houses in a continuous line would not be a good idea for Moccas and would need more flexibility which I can agree with.

Please can I have your telephone number so I can give this to the Land Agent to discuss.

Thanks

Owen

----- Forwarded message -----

From: Wyeside Resident

Date: Sat, Jun 11, 2016 at 6:06 PM

Subject: Development plan

To: Owen and Julia Whittall <[whittallmoccas@gmail.com](mailto:whittallmoccas@gmail.com)>

Hi Owen,

Further to our chat after the meeting last thursday evening I list a few points which may be of use to you and your committee:

1. I agree with the gentleman who spoke at the meeting - my immediate impression when quickly reading the plan was that it appeared to be overly prescriptive and formulaic which initially might put people off when considering whether to develop within the Wyeside parish or possibly create more challenges at planning application time which is something nobody would want.
2. The idea of contiguous roadside development appears to me to be too vague and not helpful - I believe the villages would become boring and uninteresting. A better way of describing development might be using the term "infill" sites which would give greater flexibility and interest when considering the development.
3. In the services section no mention seemed to be given to consideration of the adequacy of water supply and mains drainage which of course may inhibit development if inadequate.
4. Mention was made of attracting young professional families to the area, however I believe unless the internet infrastructure can be urgently improved this will not be possible because my experience tells me that as office accommodation becomes more expensive then shared provision and home working will become more attractive to companies trying to control their overheads.
5. Finally, if you wish to attract shared ownership building and homes for rent provision, then it might be prudent to mention the improvement of public transport provision because it may not be possible for younger families to pay rent and buy and run one or even two cars (both parents working) in rural areas such as ours in competition with cities like Hereford with all the amenities for younger people and families.

Please don't think my comments negative because I know how difficult reports of this nature are to write but I hope you find the above comments constructive and helpful as they are meant to be.

Best wishes,

Wyeside Resident

# Wyeside NDP 2011 – 2031: Consultation Statement

---

**From:** John Darbyshire [mailto:jc.darbyshire@gmail.com]  
**Sent:** 06 October 2016 11:20  
**To:** Owen Whittall <whittallmoccas@gmail.com>  
**Cc:** Alison Wright <samoyedskye@aol.com>  
**Subject:** Comments by Land Agent and Wyeside Resident

Hi Owen

I attach a copy of the comments from the Land Agent and a Wyeside Resident. So that they can review the Steering Committee responses prior to submission of the NDP to Hereford Council for independent examination.

I also attach a copy of the updated plan which reflects the changes made following the consultation comments.

Let me know if they have any concerns or require further clarification.

Best wishes

John

John Darbyshire

The Greens, Bredwardine

Herefordshire HR3 6BZ

Email: [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)

Tel: 01981 500711

Mob: 07793 158538

A copy of the responses to these questions was extracted from the Wyeside NDP Consultation Statement and sent to Harvey Thornton. No further comments were received.

## Hereford Council Planning Services

-----Original Message-----

From: Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>  
To: Samoyedskye <[Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)>  
Sent: Wed, Jun 22, 2016 04:30 PM  
Subject: Wyeside NDP - HC consultation responses to Reg14  
Alison,

Please find attached the comments received from the Herefordshire Council service providers to the Draft Wyeside Neighbourhood Plan.

Happy to discuss any of the comments or queries when you get to the stage of reviewing the representations received. If any further HC service provider comments are received prior to the end of the consultation period, I will forward them separately.

Kind regards

Sam

Samantha Banks

# Wyese NDP 2011 – 2031: Consultation Statement

---

Neighbourhood Planning Team Leader

Herefordshire Council

POX 230

Blueschool House

Hereford

HR1 2ZB

Tel: 01432 261576

email: [sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)

[www.herefordshire.gov.uk/neighbourhoodplanning](http://www.herefordshire.gov.uk/neighbourhoodplanning)



Wyese Neighbourhood Plan

Regulation 14 – Draft

Herefordshire Council Service Providers responses – June 2016.

Please find attached comments from a number of Herefordshire Council service providers to the Draft Wyese Neighbourhood Plan. If you have any queries regarding the comments or issues raised below, please contact the Neighbourhood Planning team in the first instance.

## • Planning Services

Below are combined comments from the Planning teams, the comments related to the practicality of the policy in relation to development management usage and relation to general conformity with the Core Strategy and its requirements.

### 1) Neighbourhood Planning

Front cover	This should include reference to the plan period 2011-2031
Housing Market Area map	This map has been stretched slightly
5.5	Sizes of dwellings was removed from the Core Strategy policy during the examination due to lack of robust evidence what size criteria should be imposed. Is there robust evidence able to evidence the size of site and dwellings (m2) requirements within this objective
P20 /WH01	Will need policy criteria to prevent ribbon development along the roads within the parish which eventual may lead to villages joining. Defining settlement boundaries and development criteria would allow flexibility whilst safeguarding against ribbon development



# Wyese NDP 2011 – 2031: Consultation Statement

WH03	Government policy now indicates that affordable housing can only be provided on sites of more than 10. This would discount Wyese if limited to sites of 5 and under.
------	--

## 2) Planning Policy Date: 23/05/16

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
<i>WB01- New Business Opportunities</i>	RA6, E1, E2, E4	Y	Minor correction- bullet point 6: "...Policy E4 – Tourism,"
<i>WB02- Retail Development</i>	RA6, E6	N	Is there a reason/evidence to restrict the size of A1 retail proposals to under 80sqm? This could be seen as overly prescriptive and could restrict proposals for retail provision coming forward.
5.3- Projected Housing Increase to 2031	N/A	N	The proportional growth projections should be seen as a minimum target and not a cap or limit on development. Is there evidence to suggest that the targets are likely to be met through a criteria based approach? For example, historic windfall rates?
5.4- Village Development- Numbers of New Houses	N/A	N	
5.5- Number of Houses on a Development Site	N/A	Y/N	There is some very specific criteria set out here- again this could be viewed as overly prescriptive and could serve as a barrier to new housing provision being delivered. Have these been evidenced?
5.6- Spatial Strategy- Expansion of Village Centres Only	N/A	Y/N	Is there evidence to suggest that there will be sufficient land plots to deliver enough proposals that can be seen as contiguous to the village centres? Defining a more loose settlement boundary around villages within which development would be acceptable within or adjacent to would give far more flexibility and be less restrictive, whilst still ensuring that new development will have a

## Wyese NDP 2011 – 2031: Consultation Statement

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
			<p>relationship with the existing built form.</p> <p>Development proposals in the countryside away from the villages should be assessed against Core Strategy policies RA3, RA4 and RA5.</p>
<i>WH01- New Housing Development</i>	RA2	Y/N	<p>This policy is too restrictive. It may prove difficult to identify sufficient plots of land under the very specific locational criteria set out to guarantee delivery of the minimum housing numbers required.</p> <p>Limiting the numbers only to small plots of 5 or less will make it difficult to obtain affordable housing contributions under national policy, which indicates that only sites of a minimum of 10 dwellings must provide affordable housing. It will also make it less viable for developers to provide other contributions (s106) that could benefit the community.</p>
<i>WH02- Ensuring an appropriate Range of Tenures, Types and Size of Houses</i>	H1, H3	N	<p>This is not in accordance with the Core Strategy or the NPPF. Only sites of 10 dwellings or more, or proposals which have a maximum combined floor space of over 1000sqm <i>must</i> make affordable housing contributions.</p>
<i>WH03- Affordable Housing</i>			<p>With only small scale proposals, it is also less likely that a mix of sizes, types or tenures can be sought. In particular it is unlikely also that it will be viable for developers to make affordable housing contributions.</p>
<i>WH04- Re-use of Rural Buildings</i>	RA5	Y	<p>These issues are arguably covered as comprehensively by the</p>

## Wyese NDP 2011 – 2031: Consultation Statement

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
<i>WH05- Housing in Open Countryside</i>	RA3	Y	equivalent policies in the Core Strategy, with largely the same criteria. These policies could therefore perhaps be viewed as superfluous.
<i>WHD01- New Building Design</i>	LD1, SD1	Y	SuDS should be incorporated to manage surface water at a level that is <u>appropriate to the hydrological setting of the site</u> . Development should not result in an increase in runoff.
<i>WHD02- Change of Use</i>	RA5, LD4	Y	
<i>WE01- Environmental Restrictions on Development</i>	LD2, SD3	Y	
<i>WE02- Landscape Design Principles</i>	LD1	Y	
<i>WE03- Protecting Local Green Spaces and Important Views</i>	LD1-LD3	Y/N	“Important views” is a subjective term, that without evidence or clarity on where these exist, should not be included in the policy.
<i>WE04- Renewable Energy</i>	SD2	Y	
<i>WF01- Retention of Existing Recreational Facilities</i>	SC1, OS3	Y	Suggested minor wording amendment for clarity:  “Any development proposal likely to negatively affect, <u>or result in the loss of,</u> the existing <u>community and</u> recreational facilities will not be permitted.”
<i>WF02- Picnic Areas, Improving Footpaths, and Access to the River Wye</i>	OS1, OS2, E4	Y	
<i>WF03- Additional Community and</i>	SC1, OS1, OS2	Y	

# Wyese NDP 2011 – 2031: Consultation Statement

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
<i>Recreational Facilities</i>			

## Other comments/conformity issues:

The plan goes into great detail in places over what type of development is to be sought. However, in some cases this results in policies that can be seen as too prescriptive, that could hamper development proposals coming forward. It may also make it difficult to obtain the desired contributions from developers for infrastructure that would support and benefit the local community. There are also a few other points of clarity which have been flagged up in the comments.

### 3) Development Management

No comments received

#### • Transportation and Highways

WB01	<p>Include</p> <ul style="list-style-type: none"> <li><i>Promote sustainable tourism</i></li> </ul> <p><i>(Note - Bredwardine and Bridge Sollers are the next river crossings west of Hereford and provide a natural confluence of public rights of way and quiet lanes. Between them there is potential for establishing a substantial section of a long distance cycle route between Hereford and both the National Cycle Network at Hay-on-Wye as well as feeding into the northern end of the Golden Valley. At the eastern end routes from Kingstone / Madley and Bridge Sollers link to Preston-on-Wye, then via Moccas, the route continues to Bredwardine where the river crossing offers potential to link with a similar route north of the river.)</i></p> <p>2. Be accessible by a choice of transport modes with pedestrian <i>and</i> cycle access within a reasonable walking <i>or</i> cycling distance from one of the Wyese villages, and;</p>
WHO1	<p>Where the number of dwellings per site is three or more, up to the maximum of five, a slip road running parallel to the passing road and separated by a grass verge and/or hedge will be permitted to provide a single point of access and maintain the single plot depth above, and;</p> <p><i>This appears to conflict with HC Design Guide, need to refer to HCDG, access to be at 90 degrees to carriageway with suitable visibility in as required by the actual speed of the road.</i></p> <ul style="list-style-type: none"> <li>That safe vehicular access and adequate off road parking can be achieved, and;</li> </ul>

## Wyese NDP 2011 – 2031: Consultation Statement

	<ul style="list-style-type: none"> <li>• <i>Provisions are included that encourage active travel as a preferred mode of transport, and</i></li> </ul>
WH04	<p>Include</p> <ul style="list-style-type: none"> <li>• <i>Provisions are included that encourage active travel as a preferred mode of transport, and</i></li> </ul>
WHD01	<p>Include</p> <p><i>Provisions are included that encourage active travel as a preferred mode of transport, and</i></p>
Recreational facilities – footpaths, bridle paths and picnic areas (p37)	<p>One of the joys of living in the area is the potential access to walking <i>and cycling</i> in the countryside.</p>
7.5 Transport	<p>Other than the B4352, set out below, <i>during a cycle race, most of the network</i> is single track.</p> <p><i>However, traffic levels on the quieter lanes make them attractive to cycle tourists as long distance leisure routes, particularly with the parishes' proximity to popular tourist destinations such as Hereford, Hay-on-Wye and the Golden Valley.</i></p>
7.7	<p>Reference to cycle racks on buses please note - External racks on the front of buses are currently not permitted by DfT – these would have to be internal (ie at the initiative of the operator) or carried in a trailer (eg as per Cardiff - Brecon summer buses).</p>

### • Environmental Health (Environmental Protection – noise/air)

Our comments are with reference to the potential impact on the amenity – in terms of noise, dust, odours or general nuisance to residential occupants that might arise as a result of any new residential development and also the impact of existing activities that might have a potential impact on the amenity of new residential properties.

We have no objections to the housing objectives proposed but have a suggested amendment to Housing Policy WH01 New Housing Development in relation to amenity.

Our suggest is that the policy which specifies criterion for new housing development be expanded to state

'that there is no adverse impact on the environment or privacy or amenity of neighbours, nor where there is no adverse impact on future residential occupants from existing development'

### • Environmental Health (Environmental Protection – contaminated land)

# Wyese NDP 2011 – 2031: Consultation Statement

---

Given that no specific sites have been identified in the plan I am unable to provide comment with regard to potential contamination.

## General Comments

Developments such as hospitals, homes and schools may be considered 'sensitive' and as such consideration should be given to risk from contamination notwithstanding any comments. Please note that the above does not constitute a detailed investigation or desk study to consider risk from contamination. Should any information about the former uses of the proposed development areas be available I would recommend they be submitted for consideration as they may change the comments provided.

It should be recognised that contamination is a material planning consideration and is referred to within the NPPF. I would recommend applicants and those involved in the parish plan refer to the pertinent parts of the NPPF and be familiar with the requirements and meanings given when considering risk from contamination during development.

Finally it is also worth bearing in mind that the NPPF makes clear that the developer and/or landowner is responsible for securing safe development where a site is affected by contamination.

These comments are provided on the basis that any other developments would be subject to application through the normal planning process.

### • Strategic Housing

None received

### • Landscape/Conservation/Archaeology

None received

### • Economic Development

None received

### • Education

None received

### • Property Service

None received

### • Parks and Countryside

None received

### • Waste

None received

If any additional comments are received before the closing date, this will be forwarded separately.

22/06/16

**Ward Councillor and Member of Wyese NDP Steering Committee**

**From:** Price, Philip (Cllr) [mailto:pprice@herefordshire.gov.uk]

**Sent:** 20 June 2016 10:43

## Wyese NDP 2011 – 2031: Consultation Statement

---

**To:** Samoyedskye@aol.com; jc.darbyshire@gmail.com; ahlmgroad@gmail.com;  
mwgmh@waitrose.com; annieclipson@btinternet.com; whittallmoccas@gmail.com;  
francistrst@hotmail.co.uk; jeffnewsome@hotmail.co.uk

**Subject:** RE: Wyese NDP Steering Group Minutes of 15/06/16

Alison

The wording in the minutes attached states the following.

*For the avoidance of doubt,*

*where land on the opposite side of the road from a building designated as the centre of a village is a green space (no houses having been built in that location) no housing development will be allowed in that area. By way of example, this means no development will be allowed in the orchard opposite the Red Lion Hotel in the Bredwardine village centre, east of the B4352, or the green spaces between the orchard and the west bank of the river Wye, and*

I don't think this was the specific debate, This shouldn't be the eventual policy wording otherwise village centres will change by definition. Whilst the point was referring to Bredwardine and specific fields to be protected, as a policy it would have a different meaning. For instance in the same minutes Moccas cross was identified as a centre of moccas. Applying the same logic would mean land adjacent, not currently built on would be protected. I think that the same policy would prevent the land behind the memorial at Bredwardine being developable even though it was discussed at length in the meeting that develop could take place. If any policy states clearly what can or can't happen, then the policy will apply everywhere within the plan area.

I would also suggest that the difference between "open space" to be protected and "public open space" to be protected are distinguished. They are different and would need contracts to prove acceptance!

Regards

Philip

CLlr Philip Price

Golden Valley North ward member

Cabinet member – Infrastructure

Email [pprice@herefordshire.gov.uk](mailto:pprice@herefordshire.gov.uk)

Tel 07970822447

**Note: Responses to this correspondence are published in Appendix 2 of this document.**



**APPENDIX 4: REGISTER OF CORRESPONDENCE FOR  
REGULATION 16 CONSULTATION AND PROGRESSION TO  
EXAMINATION**

## Wyeside NDP 2011 – 2031: Consultation Statement

---

“Wyeside NDP 2011-2031 Regulation 16 Consultation March 2017.pdf” is provided under separate cover in pdf format as source letters/emails were not available from Hereford Council. Note: Related policy updates agreed with the Examiner September 2017 are included in the Wyeside Neighbourhood Development Plan 2011-2031 October 2017.

-----Original Message-----

From: Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>  
To: Samoyedskye <[Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)>  
CC: Price, Philip (Cllr) (Cllr) <[pprice@herefordshire.gov.uk](mailto:pprice@herefordshire.gov.uk)>  
Sent: Thu, Apr 6, 2017 01:13 AM  
Subject: Progress to examination - Wyeside NDP

Alison,

I am pleased to inform you that the Wyeside NDP has been recommended to progress to examination. Please find attached a copy of the ‘progression to examination decision document’ and the comments received during the consultation period.

The next step will be for the LPA to apply to NPIERS for three candidate examiners and I will be back in contact with you in due course with the choose of examiners and the following stages.

Kind regards

*Sam*

Samantha Banks  
Neighbourhood Planning Team Leader  
Neighbourhood Planning Team  
Herefordshire Council  
Plough Lane  
Hereford  
HR4 OLE  
Tel: 01432 261576

email: [sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)  
[www.herefordshire.gov.uk/neighbourhoodplanning](http://www.herefordshire.gov.uk/neighbourhoodplanning)

**APPENDIX 5: EXAMINATION CORRESPONDENCE AND REPRESENTATIONS, CONCLUDING WITH THE WITHDRAWAL OF THE WYESIDE NEIGHBOURHOOD PLAN BY THE WYESIDE GROUP OF PARISH COUNCILS**

## Wyeside NDP 2011 – 2031: Consultation Statement

---

**From:** [Samoyedskye@aol.com](mailto:Samoyedskye@aol.com) [<mailto:Samoyedskye@aol.com>]

**Sent:** 05 May 2017 09:44

**To:** Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>

**Cc:** [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)

**Subject:** Re: Potential examiners for the Wyeside Group NDP

Dear Sam

The Wyeside Group would like to select Mr John Mattocks and are prepared to wait for him to undertake the exam due to his experience with rural plans. This was ratified at the PC Meeting held on the 3rd May 2017.

Thank you

Kind regards

Alison

-----Original Message-----

**From:** Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>

**To:** samoyedskye <[samoyedskye@aol.com](mailto:samoyedskye@aol.com)>

**Sent:** Wed, May 10, 2017 03:31 PM

**Subject:** RE: Potential examiners for the Wyeside Group NDP

Good afternoon Alison,

I can confirm that we have appointed John Mattocks to undertake the Wyeside NDP.

Due to existing commitments, he will be commencing the initial part of the examination wk com 26 June.

Please could you ensure that all evidence and background material is available on your website as the examiner may refer to this during the examination.

Please let me know if you have any further queries regarding the process.

Kind regards

Sam

-----Original Message-----

**From:** Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>

**To:** Samoyedskye <[Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)>

**Sent:** Wed, Jun 28, 2017 09:56 AM

**Subject:** RE: Wyeside NDP final documents email 1

Dear Alison,

The Examiner has requested a copy of the Consultation Statement Addendum 1 which was not submitted as part of the final documents and does not appear on our website. He has also viewed the parish council website and it does not appear on there.

Please could you forward a copy by return of email.

# Wyeside NDP 2011 – 2031: Consultation Statement

---

Kind regards

Sam

**From:** John Darbyshire [<mailto:jc.darbyshire@gmail.com>]  
**Sent:** 29 June 2017 08:42  
**To:** Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>  
**Cc:** [samoyedskye@aol.com](mailto:samoyedskye@aol.com)  
**Subject:** RE: Wyeside NDP

Dear Sam

Alison has asked me to respond to your email:

The document that you have requested “Consultation Statement Addendum 1” does not exist. There is however the following document “Wyeside NDP 2011-2031: Consultation Addendum 1: Questionnaire, Analysis of Responses, September 2016”, which was sent to you as part of Regulation 14 submissions and is available on our website as part of the history. It is also correctly referenced in the contents section of the Neighbourhood Plan.

I attach a copy, in case it is not to hand, for your information.

Best wishes

John  
John Darbyshire  
The Greens, Bredwardine  
Herefordshire HR3 6BZ  
Email: [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)  
Tel: 01981 500711  
Mob: 07793 158538

**From:** Banks, Samantha [<mailto:sbanks@herefordshire.gov.uk>]  
**Sent:** 29 June 2017 08:56  
**To:** John Darbyshire <[jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)>  
**Subject:** RE: Wyeside NDP

Good Morning John,

Thank you for a copy of the document. The Examiner is now requesting a copy of the questionnaire which was sent to residents. Please could send me a copy of point me in the direction on the website.

Kind regards

Sam

**From:** John Darbyshire [<mailto:jc.darbyshire@gmail.com>]  
**Sent:** 29 June 2017 09:22  
**To:** 'Banks, Samantha' <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>

# Wyeside NDP 2011 – 2031: Consultation Statement

---

**Cc:** Alison Wright <samoyedskye@aol.com>

**Subject:** RE: Wyeside NDP

Hello Sam

All of the questions from the questionnaire are listed in the contents section of “Wyeside NDP 2011-2031: Consultation Addendum 1: Questionnaire, Analysis of Responses, September 2016” and in the body of the text with comments on responses. The only aspect of the questionnaire that is missing are the “tick” boxes. I have however requested a copy of the original questionnaire from the member of our team that created it in case you think it is still necessary.

Hope this helps.

Best wishes

John

John Darbyshire  
The Greens, Bredwardine  
Herefordshire HR3 6BZ  
Email: [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)  
Tel: 01981 500711  
Mob: 07793 158538

Hello Sam

I attach the questionnaire form you requested. The questions were based on the feedback of issues from the public events, with the statistical questions that we, as the committee, added to create a framework for analysis.

Best wishes

John  
John Darbyshire  
The Greens, Bredwardine  
Herefordshire HR3 6BZ  
Email: [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)  
Tel: 01981 500711  
Mob: 07793 158538

-----Original Message-----

From: John Mattocks Planning Services [<mailto:planning@jrmattocks.co.uk>]

Sent: 29 June 2017 14:44

To: Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>

Subject: Wyeside - request for update on any housing completions and commitments

Dear Samantha

On page 16 of the Wyeside Neighbourhood Plan, paragraph 4.3, there is a table (Figure 6) in which information is given on the number of houses required in the five parishes 2011-2031 apportioned from

## Wyeside NDP 2011 – 2031: Consultation Statement

---

the overall requirement for the Golden Valley HMA in the adopted Herefordshire Core Strategy. The figure given is 39 including 6 commitments as at 1 April 2014. It is important that all plans are as up-to-date as possible.

With that in mind, are you able to advise whether any more recent statistics are available on housing completions and commitments, perhaps to 1 April 2017? Also, is the definition of a 'commitment' an extant planning permission as at the base date or are any lapsed permissions also regarded as commitments? If it is possible I would like a breakdown of the completions/commitments by individual parish so that I might understand the implications for the distribution between the villages as indicated in paragraph 4.4 of the plan.

Please copy this e-mail to the Qualifying Body so that they are aware that I have asked this question.

Regards

John Mattocks

-----Original Message-----

From: Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>

To: John Mattocks Planning Services <[planning@jrmattocks.co.uk](mailto:planning@jrmattocks.co.uk)>

CC: Samoyedskye <[Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)>

Sent: Mon, Jul 3, 2017 12:20 PM

Subject: RE: Wyeside - request for update on any housing completions and commitments

Dear Mr Mattocks,

Please find attached the update housing position for the Wyeside group of parishes

Proportional growth - 39 dwellings during the plan period April 2011 -2031

Built since April 2011 - 3 dwellings

Commitments at April 2017 - 3 dwellings

Residual - 33 dwellings

A commitment is an extant planning permission. Lapsed planning applications are not included within the housing figure.

Of the 3 dwellings built they have been within Bredwardine (2) and Preston on Wye (1)

Preston on Wye Land on North side of C1191 road, Preston on Wye, Herefordshire Construction of a new farmhouse and agricultural building

Bredwardine Mount Pleasant, Arthur Stone Lane, Dorstone, Herefordshire, HR3 6AX Change of use of redundant traditional barns to create single dwelling with attached residential annexe (2).

The 3 commitments are within Bredwardine (2) and Tyberton (1)

Bredwardine Conversion at Upper Farm House, Bredwardine, Herefordshire Change of use and conversion of garage/shed to provide single storey;2 bed accommodation/parents retirement home.  
Bredwardine Land at Crafty Webb, Bredwardine, Hereford, HR3 6BZ Erection of affordable home



# Wyeseide NDP 2011 – 2031: Consultation Statement

---

(special needs).

Tyberton Land at The Forge, Tyberton, Herefordshire, HR2 9PT Proposed new self-build dwelling

As requested I have copies in the parish clerk for their information.

Kind regards

Sam

-----Original Message-----

From: John Mattocks Planning Services <[planning@jrmattocks.co.uk](mailto:planning@jrmattocks.co.uk)>

To: Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>

CC: Samoyedskye <[Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)>

Sent: Mon, Jul 3, 2017 12:49 PM

Subject: Re: Wyeseide - request for update on any housing completions and commitments

Thank you, Samantha. In the circumstances, and exceptionally, I am copying to the Parish Clerk.

Although the numbers involved are small I need to be absolutely clear whether it is correct to say that the 'residual' figure is 33, in view of the methodology used to provide the original figure of 39.

At first glance it might appear that the 3 completions (presumably since 1 April 2014 as the figure then was '0') plus the remaining 3 commitments, totalling 6, represents the same 6 plots as shown in the table under paragraph 4.3 of the Neighbourhood Plan. But I need your confirmation of that. That is because it is possible that one or more of the 6 commitments in 2014 have since lapsed and been replaced by new commitments (or indeed completions) on new sites.

As planners we are familiar with the statistical exercises which are undertaken to assess a residual housing requirement at any particular point in time measured against the Objectively Assessed (Housing) Need (OAN) and taking account of completions etc. since the base date (2011). In view of the approach taken in Herefordshire it could be stated that the figure of 39 represents the OAN for this neighbourhood plan area. I am taking that as a given, I am not examining soundness. However, although assumptions are usually made for the likely contribution from conversions, is it not the case that special needs housing or agricultural dwellings are not usually included in any such a calculation because they are totally unpredictable and do not add to the generally available housing stock? If those two are deducted that would mean that the residual requirements as at 2017 is 35, not 33. I freely admit, however, that this is a bit of an academic point.

Regards

# Wyeside NDP 2011 – 2031: Consultation Statement

---

John Mattocks

Examiner

-----Original Message-----

From: Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>

To: John Mattocks Planning Services <[planning@jrmattocks.co.uk](mailto:planning@jrmattocks.co.uk)>

CC: Samoyedskye <[Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)>

Sent: Mon, Jul 3, 2017 01:40 PM

Subject: RE: Wyeside - request for update on any housing completions and commitments

Dear John,

Following consultation with the Strategic Planning team who undertake the monitoring, I can confirm that the 6 commitments in 2014 now form either the 3 built or the remaining 3 commitments which were highlighted. They have also confirmed that the 3 commitments have commenced.

They also confirm that the special needs housing and agricultural workers dwellings have always been included within the housing land statistics across the county.

Kind regards

Sam

-----Original Message-----

From: Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>

To: Samoyedskye <[Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)>

Sent: Wed, Jul 5, 2017 08:53 AM

Subject: Wyeside NP - Examiner's comments and questions.

Dear Alison,

As you will be aware that the Examination of the Wyeside NDP has commenced. The Examiner has now completed the initial appraisal of the plan and the written representations. He is now seeking a number of clarifications points in the form of questions.

In order to keep the momentum of the examination, he has requested that response are obtained by 21 July. Therefore, please can you send me response to the queries by midday on the 21 July.

If you have any queries regarding the process, please let me know

Kind regards

Sam

**EXAMINATION OF THE WYESIDE NEIGHBOURHOOD PLAN 2011-2031**

[Examiner's comments and questions](#)

# Wyeside NDP 2011 – 2031: Consultation Statement

---

I have completed my initial appraisal of the submitted Wyeside Neighbourhood Plan and I have read the written representations made in response to the Regulation 16 consultation. From this appraisal I have identified a number of issues upon which I require clarification, particularly in terms of the evidential basis for a number of the plan policies. To this end I pose a number of questions to which I require responses by the Wyeside Group Parish Councils (WGPC) as the 'Qualifying Body' for the preparation of this plan.

In this note I set out the background considerations leading to my questions by the use of *italic script*. Where appropriate I indicate the representation which has given rise to a particular comment and question. I raise an issue only where I consider it possible that I may need to recommend that the plan be modified in order that it fully satisfies the basic conditions.

The italicised comments in this document give an indication of my preliminary views on the listed topics. The questions are then posed in such a way as to provide the WGPC with an opportunity to respond either to the questions themselves or to my preliminary view(s) should that be considered appropriate. My final conclusions and recommendations will be given in my formal report to the Herefordshire Council at the end of the examination. It is important that the examination is undertaken in an open and fair manner and any important documents will be made available on the Herefordshire Council website for this plan.

I am aware that the WGPC sought to submit a written response to the representations made by the Herefordshire Council at the Regulation 16 stage. However, there is no procedural provision in the examination of Neighbourhood Plans for a Qualifying Body to respond directly to representations in such a way. Consequently, I have informed the Herefordshire Council that I will not be taking those written responses into account. For that reason, so that there is no doubt about the matter and to avoid any possible confusion as to its status, the response document prepared by the WGPC should not remain in the public domain. Instead, the WGPC responses to the questions I now pose should be made publicly available in due course.

The legislation provides that, as a general rule, the examination is to take the form of the consideration of written representations but an examiner must cause a hearing to be held should it be considered necessary to ensure adequate examination of an issue. At present this seems unlikely but I will confirm the position following receipt of the WGPC written responses to the questions which follow.

John R Mattocks, BSc DipTP MRTPI

Examiner

4 July 2017

*The comments and questions which follow are presented in plan order.*

## General Comment

*The Development Management (DM) section of Herefordshire Council have made some detailed points in their representation about the wording of specific policies in the plan. For the most part it will fall to the Herefordshire Council to interpret and apply the Neighbourhood Plan policies, along with those in the adopted Local Plan, in reaching decisions on planning applications. The following is an extract from the national Planning Practice Guidance (PPG):*

Paragraph: 041 Reference ID: 41-041-20140306

## **How should the policies in a neighbourhood plan be drafted?**

# Wyeseide NDP 2011 – 2031: Consultation Statement

---

A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence.....

*It appears that some reliance has been placed on the evidence base used for the preparation of the Herefordshire Core Strategy, in particular the Local Housing Market Assessment undertaken by GL Hearn. Otherwise, the major source of the justification for plan policies is the local opinion survey and questionnaire undertaken in 2014. Local opinions are important and it is notable that the survey achieved a high response rate but reliance cannot be placed on opinion alone; there also has to be factual evidence derived from field study and research into the implications of the policy choices. As stated in the PPG<sup>1</sup>:*

Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan...

*The policies in the plan are identified by the use of green boxes. However, some of the text within those boxes is actually background information which is more appropriately included in the supporting text. As indicated in the PPG the policy statements should be clear and concise. That requirement is not assisted by the inclusion of material which is not planning policy.*

*I take the view that many of the policies in the plan will require re-drafting in order to comply with Government guidance as expressed in the PPG and that this will be necessary to meet the basic conditions. Many of my questions will draw attention to aspects of 'policy' which should be re-considered, seeking the views of the WGPC on possible wording.*

Section 3. Employment and Demographics.

## Policy WB01

*In so far as the objectives for the employment policies in the plan are to encourage all types of employment and to promote tourism it is not clear how Policy WB01 is intended to achieve that given the extensive list of criteria thereunder. It is, however, recognised correctly that in land-use planning terms the only ways that development can be 'encouraged' by a plan is to state specifically as policy that planning permission will be granted provided that certain criteria are met or to specifically allocate land for the proposed use.*

Q1. *As mentioned in the DM representation, it is not clear whether all of the 'requirements' in this policy are intended to be met for planning permission to be granted. Is it the case that the first six bullet points in this policy are not criteria or requirements at all but examples of the types of development which would be permitted provided that the criteria set out in bullet points 7 to 9 inc. are met?*

Q2. *In the sixth bullet point, 'Promote sustainable tourism', there is a comment in brackets which is out-of-place within a policy statement. It is more by way of justification and reduces the effectiveness of the policy itself. What is the meaning of 'an appropriate scale'? What is the purpose of referring, within the policy, to the Employment Land Study 2012 when that is not a policy document? Core Strategy (CS) Policy E4 is a detailed policy which will apply in any event; does the NP policy add anything of value to the CS policy?*

Q3. *Should the first part of the seventh bullet point referring to the vitality and viability of a nearby centre be a criterion in Policy WB02 relating to retail development? There is nothing in either national*

---

<sup>1</sup> Ref ID: 41-040-20160211

# Wyeseide NDP 2011 – 2031: Consultation Statement

---

or local plan policy to suggest that proposals for business development should be assessed in terms of their effect on nearby centres.

Q4. The eighth bullet point relating to traffic considerations is repeated, in slightly different words, in many of the policies.

- a. Would the plan be clearer if a separate, general, policy relating to this and other common factors, such as residential amenity, was to be included in the plan and thus relate to all development proposals of whatever nature?
- b. How is an applicant to know when access and parking standards are likely to be judged 'adequate'? Are such standards set out in an adopted planning document to which reference might be made?
- c. If roads are not to be widened to accommodate traffic generated by new businesses what effect is that likely to have on the potential for the creation of such businesses? How much of a constraint does such a policy impose?

Q5. Bullet point 9. *It is not necessary to include cross-references between policies in plans. Reference is made to WGNP Policy WE01 in this and several other policies.* Is there a particular reason why this is done?

Q6. *As pointed out in the DM representation, the final (tenth) bullet point is of a different nature to the others in this policy and it is unclear.*

- a. Is it intended that if the proposed development is on a brownfield site that some or all of the other requirements should not apply?
- b. Criteria for greenfield development:
  1. How is it intended to ensure that employment is provided for the local community? Is that reasonable or feasible given the desire to attract more young (working age) families to the area? Is that not best achieved through new employment provision, not just for the existing community?

Would a proposal be refused if it did not provide local employment? What is the definition of the term 'local community' - does it apply to a single parish, the five Wyeseide parishes or any wider area?

2. To what extent does the second criterion limit the choice of sites which might be considered suitable for employment development. Would this represent a major constraint such as to undermine Employment Objective 1?

3. How is an applicant to understand what is required to satisfy this criterion?

## Policy WB02

*This policy is headed 'Retail Development'. However, in paragraph 3.6 there is but a passing reference to shops, linked to cafés. Qs3, 4a, 4b and 5 are also relevant to this policy.*

Q7. Has any research been undertaken to establish whether there is any need for additional retail (that is Use Class A1) provision in the plan area? Is there a definition of 'small'? How, exactly, would such development be 'encouraged'?

## Section 4. Housing

*The table (Figure 6) under paragraph 4.3 on page 16 of the plan includes information on the projected housing requirements, 2011-2031, within the plan area apportioned from the requirement for Golden*

# Wyese NDP 2011 – 2031: Consultation Statement

---

*Valley HMA under Policy RA1 in the adopted Core Strategy. However, at my request, the LPA have provided updated information on housing completions and commitments to 1 April 2017.*

Q8. Is it agreed that the figures included in the plan should be as up-to-date as possible and that Figure 6 should be amended to give the position as at 1 April 2017?

Q9. For clarification, is the statement in paragraph 4.4 that the numbers of houses in each village 'reasonably supports' the Core Strategy based upon 10 dwellings in each of the villages of Bredwardine and Preston-on-Wye (total 20) plus 8 in Moccas (28) and 5 in each of Blakemere and Tyberton, making 38 in total? If so, why are the total figures not included within Policy WH01?

## Policy WH01

*The policy starts with a statement that the approval of applications for housing will be subject to their satisfying 'all of the following criteria and policy WH02' yet, the bullet points under the policy vary in their nature and not all will apply in every case.*

Q10. First bullet point. *The DM section suggest that this criterion is obsolete. This appears to be a reference to the fact that the Neighbourhood Plan itself represents community engagement and, should the plan be made following a successful referendum, would form part of the statutory development plan against which applications will need to be judged. Is that what is meant by the first bullet point? If so, it does not need to be stated. Or is it intended that every application should need to obtain community support before it is approved? Not only would that potentially cause delay in the determination of applications but it might also unduly constrain the Local Planning Authority from determining applications on the basis of the merits of the case. There is nothing in national policy or guidance to suggest that a local community should have want could amount to a veto on housing development, indeed it could run counter to the positive approach the Government expects to be taken in the consideration of applications for housing development.*

*Second and fifth bullet points. The second bullet point appears to be sufficient in itself to ensure that new housing development is located and designed in such a way as to reflect the size, role and function of each village and to respect its character. However, the LPA have expressed concerns about the clarity of the policy for decision-making in terms of whether a plot can be considered as within the village. Also, much space is given in the plan to a suggested model for the layout of new housing suggested as 'best practice' at an RIBA expedition which is then formalised as policy requirement in bullet point five.*

*Although one of the purposes of neighbourhood planning is to empower the community in achieving the kinds of local development it wants that should not result in placing undue constraints on the delivery of housing. Herefordshire Council's Strategic Planning team have made representation on this point.*

Q11. a. Is not the RIBA concept for village design but one possible model? Why is it considered necessary to make that model a policy requirement rather than being in the nature of a supplementary Design Guide?

b. Could not the policy aims be achieved from the more general requirement in the second bullet point of Policy WH01? Is that considered to be sufficient to determine whether a proposal to develop a single dwelling plot would be regarded as within the village and thus meet the policy criteria?

Q12. a. What consideration has been given to the effect of the requirements in Policy WH01 on the delivery of the housing required to meet housing provision in accordance with the adopted Core Strategy (as per Figure 6)?

b. In section 5.4 of the Consultation Statement it is indicated that 'careful on-site analysis' 'has confirmed that the criteria base approach ... offers significantly more development options than is



## Wyese NDP 2011 – 2031: Consultation Statement

---

required to meet growth requirements.’ Where is the evidence to support that statement? Is there an analysis of those options which can be made available for this examination?

c. Have site owners and/or possible developers been approached to ascertain whether the RIBA model is one which would be acceptable to them and would encourage development proposals to be made in accordance with the plan?

Third bullet point. *This does not read as a criterion against which proposals for new housing will need to be judged but as a distinct policy constraint, albeit qualifying the previous bullet point.*

Q13. Is it considered that the third bullet point in Policy WH01 would be better separated out and included as distinct policy requirement/constraint? *Local Green Space designation is a significant matter which should not be treated as something of an ‘add-on’. See under Policy WE03.*

Fourth bullet point. Number of houses per site. *The purpose of the inclusion of this criterion is far from clear as is its meaning.*

Q14. How is the decision-maker intended to react to a statement that the ‘preferred’ site size is as given, especially when it is acknowledged (in paragraph 4.5) that the number of houses per development site is ‘provided as a guide only’? Why does this bullet point not reflect the recognition in paragraph 4.5 that larger developments in Bredwardine and Preston-on-Wye may be justified to ensure the provision of affordable housing?

*In this respect there is a very significant ERROR in paragraph 4.5 in the interpretation of national policy on the minimum site size threshold under which Local Planning Authorities may not seek the provision of affordable housing or a financial contribution towards off-site provision. Herefordshire Core Strategy Policy H1 is in accordance with the national policy and it is ‘more than 10 dwellings’ not ‘10 or more’ although there is also a total floor space limitation of 1000m<sup>2</sup>.*

Q15. In view of the above should provision be made in the fourth bullet point of Policy WH01 for housing developments in Bredwardine and Preston-on-Wye to be of 11 dwellings (1000m<sup>2</sup>) or more or is that adequately covered by Policy WH02? *(which would need to be amended also).*

*The point in brackets about addressing the need for affordable housing is not policy but explanation which is already covered in paragraph 4.5.*

Q16. Sixth bullet point. a. Why is this criterion included here when it is covered by policy WH02 but worded slightly differently?

b. The evidential basis for this criterion appears to be the information given in paragraph 4.8 of the plan. Is it accepted that whereas the conclusions in the GL Hearn study are derived from a needs assessment, question H4 in the local opinion survey does not measure need but is only an expression of opinion as to what the sizes of dwellings should be? In view of that, how is the local need for one-bedroom properties expected to be ‘identified’? *The same point arises in relation to the first part of Policy WH02 – What are ‘the needs of Wyese’?*

c. Is this criterion intended to apply to affordable homes as well as open-market dwellings? *The GL Hearn report, paras 13.50 and 51, indicates that the size requirement for affordable homes is different to that of open market ones.*

d. Does not the reference to provision of ‘larger’, i.e. 4 bed plus, homes, ‘where a market has been identified’ conflict with Policy WH02 which seeks a mix to meet local needs? How are the two policies to be reconciled? If there is a market is it not possible that the majority of a development could be made up of larger dwellings?



## Wyeside NDP 2011 – 2031: Consultation Statement

---

Q17. Ninth bullet point. Bearing in mind that the policy would apply to all proposals for new housing development, including those for single dwellings, is it reasonable and feasible to require provisions to encourage 'active travel'? Does that mean cycling and walking and how would it be achieved? What is the justification?

Q18. Twelfth bullet point (priority to brownfield sites). What are the implications of this in local terms? Are there any brownfield sites which would be considered suitable for housing development? Does this mean that they should be given priority over sites which conform to other locational criteria such as the second criterion? Would that 'contribute to the achievement of sustainable development'?

Q19. Thirteenth (penultimate) bullet point. *This is directly overlaps with the provisions of Policy WH02 and with the sixth point in this policy.* Why is this criterion necessary?

### Policy WH03

*Affordable Housing. There has been no local needs assessment for affordable housing in the plan area. However, reliance is placed on the conclusions of the GL Hearn study. That indicates that 35% of ALL dwellings in the Golden Valley HMA need to be affordable. That would represent 14 dwellings in this plan area.*

Q20. How can Housing Objective 8 be reconciled with the provision under policies WH01 and 02 of only two developments (one in Bredwardine, one in Preston-on-Wye) of the size necessary to achieve the provision of a proportion (35%) of the housing as affordable? *(For a development of 11 dwellings, 35% would yield 4 affordable houses, if rounded up. On the two sites, provision would thus be little over half the requirement identified in the GL Hearn study).*

Q21. In that context is it the intention that policy WH03 should be read as facilitating the provision of affordable housing 'exception sites' in accordance with CS Policy H2 and national policy to make up the shortfall? If so, why is there a cross-reference to policies WH01 and 02 which apply to sites for mixed open-market and affordable housing? The last bullet point in policy WH03 would also not apply. *The Herefordshire DM section make this point.*

Q22. Has any analysis been undertaken of the effect of the criteria in Policy WH01 on the potential for the identification of exception sites?

Q23. If it is not the intention that policy WH03 should provide for exception sites what is its purpose? *The determination of local occupancy criteria is a matter for the Local Housing Authority, not the Planning Authority.* In the absence of a local need survey what is the evidential basis for a 'preference' for shared equity/shared ownership units?

### Policy WH04

Q24. Re-use for any type of development? Are all three bullet points intended to apply to all proposals? *If so, as the representation from the DM section indicates, the second bullet point in this policy suggests that the re-use of rural buildings is only to be permitted if there is a positive contribution to rural business. That does not accord with national policy or CS Policies RA3(4) and RA5 which permit residential use.* Is there a local policy justification based upon robust and credible evidence to suggest that national or strategic local plan policy should not apply?

*The strategic planning team of Herefordshire Council make a point about the overlap of this policy, and other NP policies, with those in the adopted CS. The purpose of an NP policy should be to add local detail, justified on the basis of there being a particular requirement within the NP area. The Development Plan must be read as a whole but if an NP policy post-dates that of the adopted local plan the NP policy will take precedence.*

# Wyese NDP 2011 – 2031: Consultation Statement

---

Q25. What is the justification for the 7<sup>th</sup> bullet point relating to active travel? *See Q17. There is no such requirement in national or local plan policy for the re-use of existing buildings.*

## Policy WH05

Q26. Is it intended that this policy should apply only to new-build dwellings?

Q27. The policy is significantly more restrictive than either CS Policy RA3 or the NPPF paragraph 55. Is there a particular local justification for taking such a stance?

Q28. *The third bullet point is of a slightly different nature to the preceding two.* What is meant by the term 'neutral or positive environmental impact'? What factors are to be taken into account, how are they to be measured?

*This policy, along with WH04 and WHD01 and 02 includes a cross-referenced requirement to comply with policy WE01. Such cross-references are unnecessary and add nothing to the plan.*

## Policy WHD01

Q29. *The wording of this policy does not seem quite right.* Should it be 'Proposals for the erection of new buildings will be permitted provided the following requirements are met:?' *Government policy requires a positive approach to facilitating development. That means policy wording which indicates that development is to be permitted unless ..., not that it will only be permitted if...*

Q30. Is there a local justification for the very restrictive nature of the first bulleted requirement in this policy? Is not the fourth bullet sufficient to allow a proper assessment of the effect of a building on the character of an area? Are there no existing buildings of more than two storeys?

Q31. Agricultural and Business Buildings. Would the reference to prior approval be better placed in the accompanying text in recognition of the permitted development rights granted by the Government?

*See Qs 17 and 25 about the 'active travel' criterion. Justification? Realistic? See also Q4b.*

## Policy WHD02

Q32. Is the criterion relating to the provision of SuDS intended to apply only for new-build, as distinct from the re-use of existing buildings? *The term 'new development' is somewhat ambiguous, all development is new.*

## Section 5. Environment and Heritage

### Policy WE01

*The first part of this 'policy' is not policy at all but is an explanatory note for it. Such notes should not be within a coloured policy box but kept within the explanatory text. It is also not good practice to identify exceptions to policy within a policy.*

Q33. The restriction of development within 100m. of the River Wye SAC may have derived from a representation by Natural England but what is the justification for the identification of such a specific exclusion zone? *It may be necessary to go back to Natural England for further justification of this provision.*

*The inclusion of a cross-reference to a specific policy within the NPPF introduces in-built obsolescence to the plan because Government policy can change. It is certainly not appropriate to include an ISBN number.*

# Wyese NDP 2011 – 2031: Consultation Statement

---

Q34. Why is it necessary to include points 3 and 4 when these are to be found in other policy documents? *The NPPF represents Government policy but it does not have the same status as that of a development plan. Reference to the Waste Core Strategy could be taken as a provision relating to waste, which is precluded by statute from Neighbourhood Plans.*

## Policy WE02

*Although this policy is clearly related to Environment Objective 3 there is actually very little in the plan to justify the inclusion of such a detailed policy, especially the somewhat prescriptive nature of individual criteria.*

Q35. *This policy commences 'All new development proposals ...' (repeated in bullet point 2) but that would include minor, householder, developments. Is this intended? If not, to what types of development would it be considered appropriate to apply this policy?*

Q36. Sixth bullet point. Local species of what?

Q37. Penultimate point. Orchards. Is there a local justification for the inclusion of this policy provision? Why is there a requirement to provide 'an equivalent range of varietal fruit species'? How feasible is such a requirement? How can it be 'of at least an equivalent size to that which has been lost'? *In most cases, land will have been acquired sufficient only to allow the proposed development, such as housing, with some incidental landscaping areas, but it would seem unlikely that a replacement area for an orchard would be 'within the ownership or control of the applicant'.*

## Policy WE03

Q38. All new development? (see Q33)

Q39. Bullet point 2. Does this mean that an existing open space which is contiguous to a village centre is not protected from development?

Q40. How is an applicant to know what are the green spaces and the 'views and vistas valued by residents'? Why are these not identified in the plan, i.e. on the Policies Map?

Q41. Is there a difference between a 'green space' and a 'local green space'? Does not the 'designation' of a Local Green Space require a policy in its own right? *Perhaps extracted from policy WH01?* Is it intended that the policy set out in paragraph 78 of the NPPF should be applied in this area? *The NPPF, paragraph 77, sets out strict criteria which must be met before an area can be designated as Local Green Space. What is the justification for the designation in terms of the criteria in paragraph 77?*

## Policy WE04

Q42. Are the 'historical buildings' one and the same as those listed in paragraph 5.3 of the plan and Appendix 6 as 'heritage assets'?

Q43. National and local policy does not preclude the installation of solar panels on historic (listed) buildings but is subject to an assessment of harm to the heritage asset. Are there local circumstances to justify the stance taken in first bullet point of this policy?

## Policy WE05

*A Neighbourhood Plan can only include policy for the development and use of land, that is to guide decisions under the Planning Acts, not other legislation.*

# Wyeside NDP 2011 – 2031: Consultation Statement

---

*The title of this policy is repeated in the first bullet point. The second bullet point in this policy includes explanatory text which needs to be separated out. There is no point in including a 'policy' which simply provides a cross-reference to Core Strategy policy.*

Q44. Is it accepted that Policy WE05 should be modified to provide a simple statement of the essential policy considerations relating to sewerage and water supply?

Section 6. Facilities and services.

## Policy WF01

*It is not apparent that regard has been had to national policy, as expressed in paragraph 74 of the NPPF, nor is there consistency with CS policy (SC1 and OS3), which does not preclude the development of open space where it is demonstrated that the facility is no longer required or may be replaced by a facility which is at least equivalent to that which is to be 'lost'.*

Q45. Should policy WF01 include an additional provision to more closely reflect national and local plan policy? Are there particular reasons why such a policy should not apply in the Wyeside NP area?

## Policies WF02 and WF03

Q46. *Both of these policies state that 'applications ...will be encouraged'. How?*

**From:** John Darbyshire [<mailto:jc.darbyshire@gmail.com>]  
**Sent:** 05 July 2017 11:33  
**To:** Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>  
**Cc:** [samoyedskye@aol.com](mailto:samoyedskye@aol.com)  
**Subject:** RE: Wyeside NP - Examiner's comments and questions.

Hi Sam

Quite a lot of questions requiring responses. In some cases we may be seeking best advice from the examiner. Is that allowed? I anticipate starting the exercise next week and can hopefully comply with the 21/07 date set by the examiner.

Best wishes

John  
John Darbyshire  
The Greens, Bredwardine  
Herefordshire HR3 6BZ  
Email: [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)  
Tel: 01981 500711  
Mob: 07793 158538

**From:** Banks, Samantha [<mailto:sbanks@herefordshire.gov.uk>]  
**Sent:** 05 July 2017 17:19  
**To:** John Darbyshire <[jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)>  
**Cc:** [samoyedskye@aol.com](mailto:samoyedskye@aol.com)  
**Subject:** RE: Wyeside NP - Examiner's comments and questions.  
[Good afternoon John,](#)

The examiner is seeking the parish council thoughts on the queries, he will not be offering his advice during the course of the examination.

# Wyese NDP 2011 – 2031: Consultation Statement

---

Please let me know if you have any additional queries or issues within any of the questions.

Kind regards

Sam

-----Original Message-----

From: John Darbyshire <[jd.darbyshire@gmail.com](mailto:jd.darbyshire@gmail.com)>

To: consultations <[consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)>

CC: Alison Wright <[samoyedskye@aol.com](mailto:samoyedskye@aol.com)>

Sent: Fri, Jul 7, 2017 02:29 PM

Subject: Ref: Natural England Letter 27/03/15 to Staunton on Wye Group your ref 145211

Good afternoon.

To whom it may concern,

In the above letter from Miss Gillian Driver, Planning Adviser, South Mercia Team, the following recommendation was made to the Staunton-on-Wye Group NDP Team:

## **“Staunton-on-Wye Neighbourhood Development Plan 2014-2031**

SOWG 1-Restriction of Development We support this policy but advise that it needs to be strengthened. We suggest the following wording: **“No development will be permitted within 100 metres of the boundary of the River Wye Special Area of Conservation (SAC).** Development can only proceed where any adverse effects on the River Wye SAC can be avoided or mitigated.”

I am member of Wyese NDP Steering Group which also borders the river Wye, and following receipt of the above letter from Staunton on Wye Group we incorporated your recommendation shown in bold above, in our NDP. Our plan is currently subject to independent review, and the examiner has requested the following clarification:

**The restriction of development within 100m. of the River Wye SAC may have derived from a representation by Natural England but what is the justification for the identification of such a specific exclusion zone? *It may be necessary to go back to Natural England for further justification of this provision.***

We are required to respond to the examiner on all outstanding matters by 21 July 2017, and would therefore appreciate any clarification/justification that you can provide on this subject, in the interests of making our plan as robust as possible.

Thank you for your attention in this matter.

I look forward to receiving your response.

Best wishes

John Darbyshire

# Wyeseide NDP 2011 – 2031: Consultation Statement

---

The Greens, Bredwardine  
Herefordshire HR3 6BZ  
Email: [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)  
Tel: 01981 500711  
Mob: 07793 158538

On 17 Jul 2017 6:50 p.m., <[Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)> wrote:  
Dear Councillors

## Urgent - for your review please - Wyeseide NDP

Cllr John Darbyshire has asked me to circulate the attached documents. They are in two formats so hopefully you will be able to access the information contained within at least one of the versions.

Please see the following notes from John and please can I ask you to review the paper, in the timeframe indicated, and feedback any comments:

*"Can you please ask councillors to respond by close of business Thursday 20/07 so we have time for any changes before you send it to HC and the examiner 21/07 afternoon. **The proposed responses are shown in blue.** Please review and comment as appropriate as the final version is required to represent the views of the WGPC."*

*"Although affordable homes were mentioned as a requirement by a significant amount of residents. No actual current requirement was identified and none are registered with Herefordshire Council. To be clear we are only interested in those wanting to live in Wyeseide now. If you are aware of anyone please let me know as it is germane to some of our responses. If the need is likely to be in the future we will deal with that at a later time".*

*"The examiner has requested marked up copies of the policy maps for each village to ascertain whether enough potential development sites exist to comply with the target of 33 houses. I have printed off copies of these maps and need to meet with a councillor from each village. Jeff and Andrew for Preston as already requested, and one councillor or more from each of Moccas, Tyberton and Blakemere. In each case I will need name and contact details. I will contact Denis Price for consultation on Bredwardine."*

I will advise John of contact councillors for each Village. Please can you make time to confer with John so that he can complete this exercise. Please do not hesitate to contact me if you are unsure about this.

Thank you all for your help and co-operation.

Kind regards

Alison

***Mrs Alison Wright, Parish Clerk 01981 250860***

-----Original Message-----

From: Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>  
To: Samoyedskye <[Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)>  
Sent: Wed, Jul 19, 2017 08:50 AM  
Subject: Wyeseide NDP examination - Examiner's further questions

Dear Alison,

The Examiner has undertaken the site visit to the Wyeseide Group and has a couple of questions which he would like to parish council to comment upon as soon as possible.

## Wyese NDP 2011 – 2031: Consultation Statement

---

With regards to the 'village centre for purpose contiguous development', please could you explain the following:

The circles on the policies maps are around the community buildings rather than what might be regarded as the geographical centres of the village.

- 1) What factors or criteria has been used to decide where the 'centre' should be?
- 2) How is policy WH05 intended to be interpreted against WH01?
- 3) How is policy WH05 applied outside the five village centres? Where does the 'open countryside' apply?

If you could provide a response as soon as possible this will assist the momentum of the examination.

If you have any queries, please let me know.

Kind regards

*Sam*

**From:** samoyedskye@aol.com [mailto:samoyedskye@aol.com]  
**Sent:** 19 July 2017 11:30  
**To:** sbanks@herefordshire.gov.uk  
**Cc:** jc.darbyshire@gmail.com  
**Subject:** Re: Wyese NDP examination - Examiner's further questions

Dear Sam

Thank you for this. John is adding responses to these questions to the overall response document.

Kind regards

Alison

**From:** Underdown, Rebecca (NE) [mailto:Rebecca.Underdown@naturalengland.org.uk]  
**Sent:** 20 July 2017 13:27  
**To:** [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)  
**Subject:** Clarification/justification for NE's response (Herefordshire) Staunton on Wye NDP

Hello John,

I've had a look at the query below and have the following comments to make, which will hopefully clarify the issue.

In Natural England's response to the Pre-Submission consultation for Staunton-on-Wye Development Plan, dated 19<sup>th</sup> December 2014, we advised the following;



# Wyese NDP 2011 – 2031: Consultation Statement

---

## *Disturbance to otters*

*“To prevent disturbance to otters, the Local Plan HRA advised **no development should take place within 100m of the River Wye SAC**. We advise that this must be carried through to this Neighbourhood Plan (NP) as detailed below.*

*To ensure that there is no likely significant effect (LSE) to the River Wye SAC from the Neighbourhood Plan, the policies within the plan need to be strengthened, otherwise the Neighbourhood Plan will not be able to proceed until the Local Plan- Core Strategy is adopted. We therefore advise an additional environmental policy must be included in the Plan which specifically prevents any LSE and protects and enhances the European site, specifically excluding development within 100m of the SAC. This policy should be cross referenced to policies 3,4 B2,B3,B4 and B5.”*

One of the notified features of the River Wye SSSI/SAC is otters, and measures will have been put in place to protect the integrity of the SAC from development and prevent any adverse effects.

In Natural England’s further response to the Neighbourhood Plan Submission Draft, dated the 27<sup>th</sup> March 2015, we advised that policy SOWG 1 be strengthened, by adding in the wording from the Herefordshire Council Core Strategy Plan HRA, **“no development will be permitted within 100m of the boundary of the River Wye SAC.”**

We would emphasise that the above is related to species protection.

It has been noted that this has been carried through to the Staunton on Wye Neighbourhood Plan policy SOWG1, Sustainable Water Management, which is in conformity with Local Plan policy SD3, Sustainable Water Management and Water Resources. For any further information regarding flooding, we would recommend contacting the Environment Agency.

With regards soakaways and PTP’s, guidance was published by Natural England in September 2016. Further information and up to date guidance can be found at the link below. This guidance also refers to the standoff required between soakaways and the River Wye SAC and tributaries .  
[Development of a Risk Assessment Tool to Evaluate the Significance of Septic Tanks Around Freshwater SSSIs.](#)

Kind Regards,

Rebecca

Rebecca Underdown

Lead Advisor  
Sustainable Development  
Natural England  
Parkside Court,  
Hall Park Way  
Telford,  
TF3 4LR

020 822 56403

<http://www.gov.uk/natural-england>

# Wyeside NDP 2011 – 2031: Consultation Statement

---

From: [Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)  
To: [sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)  
Sent: 21/07/2017 13:27:50 GMT Daylight Time  
Subj: Wyeside Group - NDP - Response to Examiners Questions

Dear Sam

I attach the responses (in blue) to the examiners questions which have been discussed, reviewed and developed by the WGPC and landowners where appropriate. The information on potential development sites should be treated as confidential. Their purpose is to demonstrate that there are sufficient potential development sites to meet the target number of houses in the plan. They have not been subject to a consultation process which would be a necessary first step before publication, and could result in a number changes. However, we are confident that the target number of houses could be achieved from a selection of these sites.

Thank you

Best wishes

Alison

**Mrs Alison Wright**  
**Parish Clerk**  
**Wyeside Group**  
**01981 250860**

## **EXAMINATION OF THE WYESIDE NEIGHBOURHOOD PLAN 2011-2031**

### Examiner's comments and questions

I have completed my initial appraisal of the submitted Wyeside Neighbourhood Plan and I have read the written representations made in response to the Regulation 16 consultation. From this appraisal I have identified a number of issues upon which I require clarification, particularly in terms of the evidential basis for a number of the plan policies. To this end I pose a number of questions to which I require responses by the Wyeside Group Parish Councils (WGPC) as the 'Qualifying Body' for the preparation of this plan.

In this note I set out the background considerations leading to my questions by the use of *italic script*. Where appropriate I indicate the representation which has given rise to a particular comment and question. I raise an issue only where I consider it possible that I may need to recommend that the plan be modified in order that it fully satisfies the basic conditions.

The italicised comments in this document give an indication of my preliminary views on the listed topics. The questions are then posed in such a way as to provide the WGPC with an opportunity to respond either to the questions themselves or to my preliminary view(s) should that be considered appropriate. My final conclusions and recommendations will be given in my formal report to the Herefordshire Council at the end of the examination. It is important that the examination is undertaken in an open and fair manner and any important documents will be made available on the Herefordshire Council website for this plan.

I am aware that the WGPC sought to submit a written response to the representations made by the Herefordshire Council at the Regulation 16 stage. However, there is no procedural provision in the examination of Neighbourhood Plans for a Qualifying Body to respond directly

## Wyeseide NDP 2011 – 2031: Consultation Statement

---

to representations in such a way. Consequently, I have informed the Herefordshire Council that I will not be taking those written responses into account. For that reason, so that there is no doubt about the matter and to avoid any possible confusion as to its status, the response document prepared by the WGPC should not remain in the public domain. Instead, the WGPC responses to the questions I now pose should be made publicly available in due course.

The legislation provides that, as a general rule, the examination is to take the form of the consideration of written representations but an examiner must cause a hearing to be held should it be considered necessary to ensure adequate examination of an issue. At present this seems unlikely but I will confirm the position following receipt of the WGPC written responses to the questions which follow.

John R Mattocks, BSc DipTP MRTPI

Examiner

4 July 2017

Note: The WGPC responses below are inserted next to the relevant text in the examiner's comments and questions for ease of reference between the parties. All clarifications/responses from the WGPC as the qualifying body, are colour coded blue. In cases where it is clear from the examiners comments that the plan text should be modified, and we agree and appreciate the advice he has provided, we have used "Proposed change: with subsequent text" to mean we understand the need for the change, and offer a possible re-wording to facilitate a basis for agreement. If the examiner finds the proposed change acceptable and flags it accordingly we can make the necessary changes to the plan document for his approval. However, should the examiner have a preferred method for making changes to the plan document we will do our best to accommodate the requirement.

Regarding WGPC clarifications of the "Progression to Examination Decision Document - 4 June 2017", we apologise for the misunderstanding and have removed the clarifications from our website. Our intention was to reduce the effort needed to research the accompanying documents, and facilitate the independent examination. We now understand from the guidance notes above that these clarifications can be explored, as necessary, in the later stages of the examination.

*The comments and questions which follow are presented in plan order.*

### General Comment

*The Development Management (DM) section of Herefordshire Council have made some detailed points in their representation about the wording of specific policies in the plan. For the most part it will fall to the Herefordshire Council to interpret and apply the Neighbourhood Plan policies, along with those in the adopted Local Plan, in reaching decisions on planning applications. The following is an extract from the national Planning Practice Guidance (PPG):*

Paragraph: 041 Reference ID: 41-041-20140306

### **How should the policies in a neighbourhood plan be drafted?**

## Wyese NDP 2011 – 2031: Consultation Statement

---

A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence.....

*It appears that some reliance has been placed on the evidence base used for the preparation of the Herefordshire Core Strategy, in particular the Local Housing Market Assessment undertaken by GL Hearn. Otherwise, the major source of the justification for plan policies is the local opinion survey and questionnaire undertaken in 2014. Local opinions are important and it is notable that the survey achieved a high response rate but reliance cannot be placed on opinion alone; there also has to be factual evidence derived from field study and research into the implications of the policy choices. As stated in the PPG<sup>2</sup>:*

Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan...

A significant number of fact finding studies, including desk top research, were undertaken to produce evidence in support of the policies, whilst not necessarily identified as such in the plan for the reasons that will become clear in the comments below. These studies included:

### **Employment Data Survey, and Housing Statistics.**

We were able to get a listing of companies registered in and around the five parishes and using local knowledge attempted to assess future employment growth. None of these companies were found to be significant employers of Wyese residents. Farms are family run with peak labour requirements met by itinerant contractor labour from outside the five parishes often using specialist equipment. There are no schools or shops and only two pubs, both family run with part-time assistance and one with a live-in full-time chef and his partner who waits on table. Bearing in mind that 32% of Wyese residents are retired, as set out based in the statistical data from the questionnaire “Section 3.3 Aging Population” of the plan, the majority of working residents travel outside the five parishes as tradesmen, retail personnel or office workers. The former throughout the county and the latter two groups, mainly in the urban areas of Leominster and Hereford. In each case employment with any one particular employer tended to be one person from Wyese. Over the last few years employment demand has generally been flat, and there is no evidence of new employers entering the Wyese Group of parishes or in the near vicinity that would lead to a significant change in the flat lining of employment data. Consequently, no useful employment growth forecast data could be produced from this information. Hence the use of the GL Hearn data for employment growth set out in “Section 3 - Employment and Demographics” of the plan, as a means of producing a potential business case for the target number of properties to be built in the plan.

---

<sup>2</sup> Ref ID: 41-040-20160211

We can also confirm from our research, that the GL Hearn housing assessment of market prices (with Wyeside as part of the Golden Valley) is correct when it states that housing in this area is amongst the most expensive in the county outside of Ledbury, as set out in “Section 4.2 Market Overview” of the plan. Our analysis confirmed that these prices are largely driven by incomers who want to experience the rural way of life, and in a positive way bring new life into communities that would otherwise prove unsustainable. Unfortunately, the low level of houses for sale or sold across the five parishes of Wyeside over a three to four years period means insufficient statistical evidence is available to produce a meaningful average price. Although we believe the average price is probably significantly higher than the £220,000 of the GL Hearn study for the Golden Valley as a whole. In the absence of good statistical data, we decided to use the GL Hearn study average price as it is sufficient to identify the shortfall in availability of houses at prices local people can afford.

These high prices in comparison with Herefordshire urban areas, means that even affordable housing with a 20% reduction in price are more than eight times the average earnings of local young families. If you add in the additional travel costs for a two-car family living in a rural community such as Wyeside, where there is very limited public transport, it is not surprising that most young families choose to set up home in Hereford or the surrounding towns and large villages. House prices in these urban areas are significantly lower, there is more choice, with better access to jobs, reasonable public transport, and a broader range of facilities and services. This loss of young families to more urban areas was captured successfully in the statistical data from the questionnaire and is set out in “Section 3.3 Aging Population, Figure 4, Current Age Profile in the Wyeside Area”. Consequently, policy WH01 – New Housing Development bullet 4, proposes ten or more dwellings (to be changed to 11 or more) in the larger villages of Bredwardine and Preston-on-Wye to address this shortfall in affordable housing.

### **Facilities and Services**

A substantial piece of work, both desk top and interview, was undertaken to record transport services, facilities and other services that exist or not within Wyeside. This included an investigation of activities available and planned in each of the three village halls. The results of this work are set out in Section 6 - Facilities and Services of the plan. The intention is that lack of recreation facilities will be addressed by provision of larger development sites in the two largest village communities of Bredwardine and Preston-on-Wye, as set out in policy WH01, bullet 4. It can also be seen from this work that the lack of public transport is a major concern with residents getting older and some not being able to drive a car, which is outside the scope of the plan.

### **Young Residents’ Future Housing Requirements**

A special “Planning for Real” team attended the Young Farmers Club (YFC) barbecue event at Moccas on 26 August, to get a better understanding of the younger generation’s views, as there was only limited response from this group to the questionnaire. The event and their comments were included in the “Wyeside NDP Consultation Statement”, register of comments,

and are set out in Appendix 1 of that document: Open Days – Public Comments and NDP Responses/Actions. This study evidenced that local young people wanted family homes if they were to stay within the Wyeside communities or return at some time in the future. There was no demand for single person houses or flats. The reasons for the differences between the GL Hearn study and this data is fully explained in our response to Q16b, below.

### **Special Area of Conservation (SAC) Regulations for the River Wye**

This fact-based SAC environmental desk top study was undertaken and research material included in the plan to address concerns, and a lack of understanding, regarding the impact of the River Wye SAC Regulations on our farming industry and future housing developments.

### **Adoption of a Criteria Based Plan**

A criteria based plan was adopted by WGPC because the evidence to support significant development in the short-term is fragmented, and insufficient to create interest for consultations with landowners, residents and developers. Although the target figure of 33 houses across all five communities to 2031 (after allowing for the 2014 commitment of 6 houses of which 3 appear to have been completed) is within historical average growth rates. Properties can be in the market for a year or two before selling in the average price range and up to 3 years for the more expensive end of the market.

WGPC are intending to become more active in consultation with landowners, residents and developers, regarding identification of specific sites for development, and the demand for different house sizes once the independent examination has been completed and hopefully been accepted in referendum. It is anticipated that at that time we will be in a better position to assess the benefits of broadband (still patchy in many areas of Wyeside) and the development of industry employment hubs around the planned university campus in Hereford, which could create a demand for housing within Wyeside, for those that prefer to live in a more rural environment. Wyeside is between 7 and 12 miles from Hereford. In addition, we intend exploring further the likely demand for affordable homes and down-sizing by older couples to free up family properties. Both of which we identified as future needs whilst unable to find any evidence of significant demand in the short-term. Hence our policy of leaving open the likely mix of houses until the demand has become clearer, as set out in “Section 4.8 – Number of bedrooms per House” on page 22 of the plan, and “Section 4.9 – Affordable Housing and Downsizing for older/less Able People” on page 23 of the plan.

*The policies in the plan are identified by the use of green boxes. However, some of the text within those boxes is actually background information which is more appropriately included in the supporting text. As indicated in the PPG the policy statements should be clear and concise. That requirement is not assisted by the inclusion of material which is not planning policy.*

*I take the view that many of the policies in the plan will require re-drafting in order to comply with Government guidance as expressed in the PPG and that this will be necessary to meet the basic conditions. Many of my questions will draw attention*



*to aspects of 'policy' which should be re-considered, seeking the views of the WGPC on possible wording.*

We apologise for the planning policy statements which are not considered sufficiently concise. The plan was drafted without recourse to a planning specialist. We employed contract law experience which requires terms and conditions to be wholly inclusive, and can include explanatory text in the interests of aiding understanding and consistent application. In this regard, we appreciate the additional work you are undertaking to make the plan as clear and robust as possible. Thank you.

Section 3. Employment and Demographics.

### Policy WB01

*In so far as the objectives for the employment policies in the plan are to encourage all types of employment and to promote tourism it is not clear how Policy WB01 is intended to achieve that given the extensive list of criteria thereunder. It is, however, recognised correctly that in land-use planning terms the only ways that **development can be 'encouraged' by a plan is to state specifically as policy that planning permission will be granted provided that certain criteria are met or to specifically allocate land for the proposed use.***

Q1. *As mentioned in the DM representation, it is not clear whether all of the 'requirements' in this policy are intended to be met for planning permission to be granted. Is it the case that the first six bullet points in this policy are not criteria or requirements at all but examples of the types of development which would be permitted provided that the criteria set out in bullet points 7 to 9 inc. are met?*

Proposed change: Policy WB01 bullets 1-6 to be separated with "supports one or more of the following types of development, and bullets 7-9 with "Provided the following requirements are met".

Q2. *In the sixth bullet point, 'Promote sustainable tourism', there is a comment in brackets which is out-of-place within a policy statement. It is more by way of justification and reduces the effectiveness of the policy itself. Proposed change: Delete comment in brackets.*

**What is the meaning of 'an appropriate scale'?** Tourist facilities that can be accommodated within small rural communities where access is frequently by single-track roads. It is proposed that the numbers of passing points are increased if small businesses increase traffic volumes.

What is the purpose of referring, within the policy, to the Employment Land Study 2012 when that is not a policy document? The reference to the land study was added to the first draft of the plan following a comment from a third party and explained by them as providing further clarity. Proposed change: Delete reference to employment land.

Core Strategy (CS) Policy E4 is a detailed policy which will apply in any event; does the NP policy add anything of value to the CS policy? Parish Councillors are usually the first point of contact for a resident with concerns related to a planning



submission, and quite often a lot of time and effort is wasted attempting to find the best way to help them. We intend using the NDP as a live document, with important references in appropriate policy areas, to enable the WGPC to provide sensible and comprehensive advice. Thereby improving our services to the community and hopefully improving the quality and brevity of their comments on planning submissions.

Q3. Should the first part of the seventh bullet point referring to the vitality and viability of a nearby centre be a criterion in Policy WB02 relating to retail development? *There is nothing in either national or local plan policy to suggest that proposals for business development should be assessed in terms of their effect on nearby centres.* **Proposed change: add bullet to Policy WB02 "Ensure that the development is of a scale which would not threaten the vitality and viability of a nearby centre."**

Q4. *The eighth bullet point relating to traffic considerations is repeated, in slightly different words, in many of the policies.*

- a. Would the plan be clearer if a separate, general, policy relating to this and other common factors, such as residential amenity, was to be included in the plan and thus relate to all development proposals of whatever nature? **Proposed change: Separate Policy WF04 – General Policy Applicable to all Developments: "Ensure that traffic generated by any proposal can be accommodated safely within the local road network which in many cases is single track, and does not result in the need to widen roads along their entire length or the removal of hedgerows, except where additional passing points are needed to manage increases in traffic volumes, demonstrate that landscape, environmental and amenity impacts are acceptable, and that access and parking standards are adequate;" to be added to Section 6 – Facilities and Services.**
- b. How is an applicant to know when access and parking standards are likely to be judged 'adequate'? **Are such standards set out in an adopted planning document to which reference might be made? Yes. "Average and disabled sizes of parking spaces are set out in Proposed change: after "adequate" in "response to a" above add: "in compliance with Herefordshire Council's "Highways Design Guide for New Developments July 2006, page 32 "Dimensions and Location of Parking Spaces."**
- c. If roads are not to be widened to accommodate traffic generated by new businesses what effect is that likely to have on the potential for the creation of such businesses? How much of a constraint does such a policy impose? **Many Wyeside properties are scattered alongside single-track roads. Widening of these roads which cover substantial areas of Wyeside would be a highly disruptive and costly affair, that is unlikely to be economic for small to medium size enterprises (SME's). However, WGPC considers that the needs of small businesses, and traffic such as caravans to local sites can be met by increasing the number of passing points to ensure traffic does not come to a halt. It is also feasible to encourage development of small "cottage industries" such as trades and crafts, internet based retail and knowledge industries, that do not require significant road access, adjacent to single track roads. In addition, the B4352 offers slightly better access flexibility, in sections where visibility of oncoming traffic allows.**

## Wyese NDP 2011 – 2031: Consultation Statement

---

Q5. Bullet point 9. *It is not necessary to include cross-references between policies in plans. Reference is made to WGNP Policy WE01 in this and several other policies.* Is there a particular reason why this is done? These references were added to the plan following a comment from a third party. The plan already had the following statement at the end of Section 1.2 Consultation and Development of Objectives and Policies: **“Developers should read all of the objectives and policies in each section to ensure that they fully understand the requirements of the plan”**. Would this be sufficient? Proposed change: Delete cross references between policies in the plan.

Q6. *As pointed out in the DM representation, the final (tenth) bullet point is of a different nature to the others in this policy and it is unclear.*

- a. Is it intended that if the proposed development is on a brownfield site that some or all of the other requirements should not apply? **Proposed change: “That if the proposal is on a “brown field” site it must comply with the relevant building design and/or change of use, environmental and facilities and services policies set out in this plan.**
- b. Criteria for greenfield development:
1. How is it intended to ensure that employment is provided for the local community? Is that reasonable or feasible given the desire to attract more young (working age) families to the area? Is that not best achieved through new employment provision, not just for the existing community? Would a proposal be refused if it did not provide local employment? What is the **definition of the term ‘local community’** - does it apply to a single parish, the five Wyese parishes or any wider area? **Proposed change: “A proposal for a green field development must:**
    1. Offer employment to existing and/or new residents re-locating to the Wyese Group of parishes, and surrounding area, where feasible.
    2. To what extent does the second criterion limit the choice of sites which might be considered suitable for employment development. *Within walking distance of one of the five villages would not limit the number of potential development sites in a way that would be perceived as a constraint, as the layout of each village centre supports a significant number of potential development site locations.* Would this represent a major constraint such as to undermine Employment Objective 1? Unlikely, as most employers, if they are prepared to consider a rural location, **would welcome access to a local village’s housing and other facilities for some or all of their personnel without the need for extensive travel.**
    3. How is an applicant to understand what is required to satisfy this criterion? **Proposed change: That it must comply with the relevant building design and/or change of use, environmental and facilities and services policies set out in this plan.**

### Policy WB02

*This policy is headed ‘Retail Development’. However, in paragraph 3.6 there is but a passing reference to shops, linked to cafés. Qs3, 4a, 4b and 5 are also relevant to this policy.*

Q7. Has any research been undertaken to establish whether there is any need for additional retail (that is Use Class A1) provision in the plan area? There is no requirement for Class A1 retail development. Wyese is sparsely populated and well serviced in this respect from surrounding towns and the larger villages for those who have access to personal transport. In this respect, most households are of two car families or more. It was included in the plan as a policy because of concerns in Preston-on-Wye that residents may lose the bus service that goes to Hereford, and there are a few older people in the village that do not have access to a car. In such a case WGPC would have to work out how best to help them. However, HC have since extended provision of the bus service into Hereford from Preston-on-Wye for another three years, so the problem has gone away in the short-term. To integrate retail into the WB01 policy is probably overkill.

**Is there a definition of 'small'?** Proposed change: "small retail developments that reflect the footfall experienced in one or more of the larger villages.

**How, exactly, would such development be 'encouraged'?** Initially it would make sense to use one or more of the village halls a couple of mornings a week with volunteers buying food from the supermarkets and re-selling it in the village halls. They are already used a couple of mornings a month to sell local produce within their respective communities. Development of a small village shop would only be considered if the number of local people using the service provided a sensible business case. This is currently considered unlikely.

#### Section 4. Housing

*The table (Figure 6) under paragraph 4.3 on page 16 of the plan includes information on the projected housing requirements, 2011-2031, within the plan area apportioned from the requirement for Golden Valley HMA under Policy RA1 in the adopted Core Strategy. However, at my request, the LPA have provided updated information on housing completions and commitments to 1 April 2017.*

Q8. Is it agreed that the figures included in the plan should be as up-to-date as possible and that Figure 6 should be amended to give the position as at 1 April 2017? Proposed change: Update the 2014 figures in the table to reflect 3 houses have now been built and 3 are committed.

Q9. For clarification, is the statement in paragraph 4.4 that the numbers of houses in each village 'reasonably supports' the Core Strategy based upon 10 dwellings in each of the villages of Bredwardine and Preston-on-Wye (total 20) plus 8 in Moccas (28) and 5 in each of Blakemere and Tyberton, making 38 in total? If so, why are the total figures not included within Policy WH01? We were advised that we cannot apply caps on the maximum number of houses in each village. The number of houses to be built is clearly stated in the plan. We therefore saw no additional benefit including what is only a target figure, in a policy statement. If, however the target figure for the number of houses across Wyese as a whole can be treated as a cap we agree that it should be specified as such in Policy WH01.

Policy WH01

*The policy starts with a statement that the approval of applications for housing will be subject to their satisfying 'all of the following criteria and policy WH02' yet, the bullet points under the policy vary in their nature and not all will apply in every case. By removing bullet 3 from WH01 and inserting it as a new bullet point in "Policy WE03 - Protecting Local Green Spaces, Open Spaces and Important Views" Section 5 Environment and Heritage, as recommended in your Q13 below, and adding "if feasible" to the end of the current bullet 12 all of the criteria in Policy WH01 can be satisfied in every case.*

Q10. First bullet point. *The DM section suggest that this criterion is obsolete. This appears to be a reference to the fact that the Neighbourhood Plan itself represents community engagement and, should the plan be made following a successful referendum, would form part of the statutory development plan against which applications will need to be judged. Is that what is meant by the first bullet point? If so, it does not need to be stated. Please accept our apologies, Bullet 1 is meant to refer to a consultation process with the local community prior to submission of a plan for approval, as a number of sites are suitable for development but specific sites have not been selected during the development of the criteria based plan. Proposed change: at end of bullet 1 add "through a consultation process with the local community prior to a planning submission".*

*Or is it intended that every application should need to obtain community support before it is approved? It is intended to be an opportunity for the local community to comment before a proposal is submitted for approval and whilst it is still in preparation.*

*Not only would that potentially cause delay in the determination of applications but it might also unduly constrain the Local Planning Authority from determining applications on the basis of the merits of the case. If a developer consults with the local community whilst the plan is in preparation only, there will be no delay to the determination process.*

*There is nothing in national policy or guidance to suggest that a local community should have want could amount to a veto on housing development, indeed it could run counter to the positive approach the Government expects to be taken in the consideration of applications for housing development. A consultation process whilst a plan is in preparation is not a veto. It is anticipated that it may become necessary for WGPC to be actively involved in negotiations with landowners and encourage developers to build properties if the targets are to be met, and we would not do so without consulting with the local community first. None of this would delay the planning submission and approval phases and may facilitate a more successful outcome for the planning process.*

Second and fifth bullet points. *The second bullet point appears to be sufficient in itself to ensure that new housing development is located and designed in such a way as to reflect the size, role and function of each village and to respect its character. The second bullet would not exclude "dead-end" cul-de-sacs. The term dead-end cul-de-sacs is explained in response to Q11, below.*

*b. However, the LPA have expressed concerns about the clarity of the policy for decision-making in terms of whether a plot can be considered as within the village.* In each of the villages the properties are in reasonably close proximity near the centre and then spaces of one field or more occurs before the next property which is part of the scattering of properties within Wyeseide as a whole. This can be seen by reference to the maps provided with this document which set out development **locations for application of the policy “development contiguous to village centres”** identified. It is clear from these examples that identifying the end of a village centre is simple and straightforward.

However, it is of prime importance that the personnel required to implement a policy have a clear understanding as to its application to avoid any ambiguity in their rulings. We therefore propose consideration of supplementary guidance notes to the policy statement, if you consider it necessary, to ensure application is consistent in all cases. Examples that may need to be considered include:

- What happens if a property owner within the village centre decides to sell a portion of the garden for development? This propose that this would be treated no differently from the same situation where settlement boundaries are the basis of development policies.
- What happens if the owner of the next available plot of land from properties contiguous to the village centre, does not want to sell. In such a case, it is proposed that this space becomes part of the village centre and the next available plot of land becomes available for development. If at some time in the future an owner wishes to sell the land that was not previously available, as it would exist contiguous to the village centre the example in the first bullet would apply.
- There may be other examples that need to be considered. Any advice that you are prepared to give would be appreciated.

**However, the benefits of a policy for development to be “contiguous to the village centre(s); i.e. using a spatial area of land, or field adjacent to a village centre, so as to not result in free standing, individual or groups of dwellings, which are obviously separate from village centres;” are clear.**

These benefits are:

The settlement patterns of the five villages within the Wyeseide Group Parish have evolved over time without settlement boundaries. Each village having one or more central areas with a small grouping of properties, reasonably widely spaced. Away from these centres properties are widely dispersed and scattered over a substantial area.

This separation of village centres from the widely dispersed and scattering of properties that surround them is a distinctive feature that is clear cut and evidential. And one which we wish to retain, whilst encouraging a community feel within the centres. This clear separation as set out in the policy maps, means that the concerns raised regarding identification of appropriate development sites adjacent to the village centres is not valid for the Wyeseide Group Parish.



Development which is contiguous to a centre has been applied successfully by Tower Hamlets to create critical mass, within reasonable footfall distances, for shopping areas. This approach ensures that the village centres will expand in a way that enhances the community whilst retaining the distinctive settlement pattern.

If we were to locate settlement boundaries around each of the centres and allow adjacent development this would encourage a higher density of housing than currently exists in Wyeseide, leading to the loss of the distinctive settlement patterns. Alternatively, if we locate the settlement boundaries further out, to avoid increases in housing density, we run the risk of developments becoming fragmented and occurring away from the village centres.

*Also, much space is given in the plan to a suggested model for the layout of new housing suggested as 'best practice' at an RIBA expedition which is then formalised as a policy requirement in bullet point five. See comments below against Q11.*

*Although one of the purposes of neighbourhood planning is to empower the community in achieving the kinds of local development it wants that should not result in placing undue constraints on the delivery of housing. Herefordshire Council's Strategic Planning team have made representation on this point.*

Including footpaths to link new housing developments with the rest of the village in what would otherwise be dead ends cul-de-sacs for villagers has not been found to be a limitation on the number of housing developments in other parts of the country, where the RIBA model has been adopted successfully for more than 25 years. In some cases before it was recognised by RIBA. Why should it be here?

Q11. a. Is not the RIBA concept for village design but one possible model? Why is it considered necessary to make that model a policy requirement rather than being in the nature of a supplementary Design Guide? There are a small number of cul-de-sacs within the larger villages which serve their residents and visitors but have become dead areas for other members of their community, who have no reason to visit. The RIBA model creates public footpaths to open up areas to public access within a village centre, enhancing the village as a community because it is also physically connected. It is the logical way to ensure a village continues to develop as a community. In meetings held with residents where the RIBA model was discussed it achieved significant support, and has been agreed by the WGPC as the way forward.

b. Could not the policy aims be achieved from the more general requirement in the second bullet point of Policy WH01? *The second bullet would not exclude a dead-end cul-de-sac.* Is that considered to be sufficient to determine whether a proposal to develop a single dwelling plot would be regarded as within the village and thus meet the policy criteria? *Please see comments above in response to Q10b.*

Q12. a. What consideration has been given to the effect of the requirements in Policy WH01 on the delivery of the housing required to meet housing provision in accordance with the adopted Core Strategy (as per Figure 6)? *The level of regulations in WH01, assuming the proposed changes we have listed following your comments are accepted, are fairly easily complied with, if you respect the*

countryside. A far a greater concern, is the lack of new building development. In the last 10 years very few new houses have been built within Wyeseide. This is probably because of the 1 to 2 years, and in some cases 3 years, it takes to sell a property in this area. And, is the probable cause of developers ceasing to be involved in any new developments. The problem appears to be that the area is poorly served by roads, many of which are single track with few passing points, requiring drivers to reverse considerable distances, and the lack of facilities and **services, as set out in Section 6 "Facilities and Services of the plan. Developers** also have access to other areas of Herefordshire where houses are known to sell more quickly. No amount of deregulation can be expected to change the economics of this situation, and to reduce the amount of regulations would, in our opinion, harm the rural nature and feel of the Wyeseide countryside. If we are to achieve the targets set out in the plan developers and buyers will need to be convinced that Wyeseide is a good place to live, and that properly laid out houses that reflect the **needs of villagers' and the countryside will sell. Adopting the RIBA model is part of** this strategy, to differentiate Wyeseide, as a beautiful rural area in which to live, (which we believe has been undersold in the past) and to encourage developers and buyers back into the market.

In section 5.4 of the Consultation Statement it is indicated that 'careful on-site analysis' 'has confirmed that the criteria base approach ... offers significantly more development options than is required to meet growth requirements.' Where is the evidence to support that statement? Is there an analysis of those options which can be made available for this examination? We considered it undesirable to include speculative information in the plan, which has not been part of a consultation process with residents. We would therefore appreciate it, if the attached marked up policy maps in the email with this document for your reference, are treated as confidential.

c. Have site owners and/or possible developers been approached to ascertain whether the RIBA model is one which would be acceptable to them and would encourage development proposals to be made in accordance with the plan? **The selection of "a criteria" based plan, for reasons related to the flatlining of** employment and the housing market in Wyeseide, means that consultations with landowners and developers will not occur until after the plan goes to referendum. However, as set out above, the RIBA best practice model is a well proven approach that has been successfully implemented for over 25 years in other areas of the country. We do not therefore expect resistance from landowners or developers, and as stated earlier our intention is to make this part of a long-term plan to **improve Wyeseide's image as a good place to live, and reduce house sales' lead** times.

Third bullet point. *This does not read as a criterion against which proposals for new housing will need to be judged but as a distinct policy constraint, albeit qualifying the previous bullet point. Agreed.*

Q13. Is it considered that the third bullet point in Policy WH01 would be better separated out and included as distinct policy requirement/constraint? *Local Green*



## Wyeside NDP 2011 – 2031: Consultation Statement

---

*Space designation is a significant matter which should not be treated as something of an 'add-on'. See under Policy WE03.* Proposed action: remove bullet 3 from WH01 and insert it as a new bullet point in "Policy WE03 - Protecting Local Green Spaces, Open Spaces and Important Views" of Section 5 Environment and Heritage,

Fourth bullet point. Number of houses per site. *The purpose of the inclusion of this criterion is far from clear as is its meaning.* Concerns were expressed by residents in public meetings, prior to issue of the questionnaire, relating to the need to ensure that any developments would be of a scale that could be absorbed within the existing communities without causing fragmentation of the friendly and inclusive spirit that exists within Wyeside. Preferred sizes of development sites were seen as a good way to express this need.

Q14. How is the decision-maker intended to react to a statement that the 'preferred' site size is as given, especially when it is acknowledged (in paragraph 4.5) that the number of houses per development site is 'provided as a guide only'? WGPC intends to consult with landowners and developers following referendum and consequently will manage their expectations in this regard.

Why does this bullet point not reflect the recognition in paragraph 4.5 that larger developments in Bredwardine and Preston-on-Wye may be justified to ensure the provision of affordable housing? The bullet points and subsequent paragraph in 4.5, are not in conflict with each other. The reported "notional" maximum number of properties per development site is a true representation of the responses to the questionnaire. They are included here in the interests of adherence to a properly reported consultancy process within the Wyeside community. Ensuring a clear audit trail and transparency for WGPC's actions. The following paragraph proposing "more than 10" properties for the larger villages of Bredwardine and Preston-on-Wye, for the purposes of addressing residents' primary need for affordable housing, and for receiving contributions from developers for infrastructure, is there to show how the WPGC intends to balance the conflicting needs of the community, which will be tested in referendum.

*In this respect there is a very significant ERROR in paragraph 4.5 in the interpretation of national policy on the minimum site size threshold under which Local Planning Authorities may not seek the provision of affordable housing or a financial contribution towards off-site provision. Herefordshire Core Strategy Policy H1 is in accordance with the national policy and it is 'more than 10 dwellings' not '10 or more' although there is also a total floor space limitation of 1000m<sup>2</sup>.* Please accept our apologies for the error. Proposed change: Delete "10 or more" and replace with "more than 10" in the supporting text.

Q15. In view of the above should provision be made in the fourth bullet point of Policy WH01 for housing developments in Bredwardine and Preston-on-Wye to be of 11 dwellings (1000m<sup>2</sup>) or more or is that adequately covered by Policy WH02? (which would need to be amended also). Proposed change: delete "ten or more" and replace with "more than 10" in the Policy statement.

## Wyeside NDP 2011 – 2031: Consultation Statement

---

*The point in brackets about addressing the need for affordable housing is not policy but explanation which is already covered in paragraph 4.5. Proposed change: Delete explanatory comment in brackets.*

Q16. Sixth bullet point. a. Why is this criterion included here when it is covered by policy WH02 but worded slightly differently? Proposed change: Delete bullet 6. **And the following text is to be transferred to Policy WH02: "of predominately two, and three bedroom properties but not wholly to the exclusion of one bedroom homes, where a local need has been identified, or larger homes where a market has been identified"**

b. The evidential basis for this criterion appears to be the information given in paragraph 4.8 of the plan. Is it accepted that whereas the conclusions in the GL Hearn study are derived from a needs assessment, question H4 in the local opinion survey does not measure need but is only an expression of opinion as to what the sizes of dwellings should be? In view of that, how is the local need for **one-bedroom properties expected to be 'identified'**? *The same point arises in relation to the first part of Policy WH02 – What are 'the needs of Wyeside'?* **WGPC access to good "on the ground" historical data on local housing sizes (reflecting past demand) from local opinion surveys, and verification interviews with the target group of young people in Wyeside and the surrounding parishes (for clarification of that need) set out in the Consultation Statement Young Farmers Club interviews 26 August 2014, (none of which were available to the needs assessment model) produces more reliable and accurate predictions than a needs assessment model. Such a model, employs sampling techniques to calibrate its assumptions and then extrapolates for target group population predictions. In such cases, if a particular target group is underrepresented within the samples the model produces unreliable and inaccurate results for that group, which is what seems to have happened here. This inaccuracy is presumably the fault of the consultant who did not apply the model methodology rigorously enough on behalf of Herefordshire Council. Unfortunately, this raises questions as to the reliability of other predictions for rural locations. If the data on the ground disagrees with a prediction from such a model, the data on the ground should be treated as the more reliable and accurate set of predictions. Hence use of WGPC field data over that produced by the GL Hearn model.**

c. Is this criterion intended to apply to affordable homes as well as open-market dwellings? *The GL Hearn report, paras 13.50 and 51, indicates that the size requirement for affordable homes is different to that of open market ones. As the GL Hearn report model data has proven to be erroneous regarding the number of bedrooms for affordable houses, we propose that house sizes will be the subject of consultations with landowners, developers and the community of Wyeside, and will not be included in policy statements. We also received guidance from a third party, that Policy statements should not include constraints on house sizes, as it is for the market to determine such requirements.*

d. Does not the reference to provision of 'larger', i.e. 4 bed plus, homes, 'where a market has been identified' conflict with Policy WH02 which seeks a mix to meet

local needs? How are the two policies to be reconciled? If there is a market is it not possible that the majority of a development could be made up of larger dwellings? **Proposed change: delete "types and size of houses that reflect the needs of Wyese; "; insert "predominately two, and three bedrooms' properties but not wholly to the exclusion of one bedroom homes, where a local need has been identified, or larger homes where a market has been identified" in Policy WH02.** This reconciles the two policy statements whilst leaving an option open for when the market demand for larger 4 bedrooms' houses becomes clearer.

Q17. Ninth bullet point. Bearing in mind that the policy would apply to all proposals for new housing development, including those for single dwellings, is it reasonable and feasible to require **provisions to encourage 'active travel'**? Does that mean cycling and walking and how would it be achieved? What is the justification? **This bullet point was inserted at the request of a third party, following Regulation 14.** We would have no objection to its removal if HC is in agreement. **Proposed change: Delete bullet 9.**

Q18. Twelfth bullet point (priority to brownfield sites). What are the implications of this in local terms? Are there any brownfield sites which would be considered suitable for housing development? Does this mean that they should be given priority over sites which conform to other locational criteria such as the second **critierion? Would that 'contribute to the achievement of sustainable development'?** **There are no known brownfield sites within Wyese. The policy is included in case the "cycle of develop, use and dispose" up to 2031 creates a brownfield site.** Consequently, the second part of your question is unanswerable at this time.

Q19. Thirteenth (penultimate) bullet point. *This is directly overlaps with the provisions of Policy WH02 and with the sixth point in this policy.* Why is this criterion necessary? **Proposed change: Delete bullet thirteen.**

### Policy WH03

Affordable Housing. *There has been no local needs assessment for affordable housing in the plan area.* Herefordshire Council hold a register of people requesting affordable homes. In 2014/15, at the time the plan was being produced, no one was listed as requiring affordable homes in Wyese. Whereas concerns were expressed in public events of the need for affordable housing and the verification process with the young farmers club set out above identified the need for family homes, again no immediate requirement was identified in discussions at public events with these parties.

*However, reliance is placed on the conclusions of the GL Hearn study. That indicates that 35% of ALL dwellings in the Golden Valley HMA need to be affordable. That would represent 14 dwellings in this plan area.* The GL Hearn study employment growth estimates were used, to justify the target number of houses, in the absence of any evidence of significant historical employment growth **in Wyese. The majority of Wyese people that are classed as "working", travel outside of the five villages for employment.** There is no recent evidence to suggest a 35% target for affordable housing is realistic for Wyese, although we would like

policies in place to support the target figure, in case the situation changes. In this regard, it may be beneficial to anticipate that regional variations will occur from the aggregate level data from the GL Hearn model with some areas requiring more than 35% affordable homes and some requiring less.

Q20. How can Housing Objective 8 be reconciled with the provision under policies WH01 and 02 of only two developments (one in Bredwardine, one in Preston-on-Wye) of the size necessary to achieve the provision of a proportion (35%) of the housing as affordable? *(For a development of 11 dwellings, 35% would yield 4 affordable houses, if rounded up. On the two sites, provision would thus be little over half the requirement identified in the GL Hearn study).* The lack of an evident demand on the ground in the short-term for affordable homes is a concern. The NDP is designed to create a framework for the development of **affordable homes, should a future demand materialise. In this respect "Housing Objective 8, requires identification of a local need" before it becomes feasible to attract developer interest.**

Q21. In that context is it the intention that policy WH03 should be read as **facilitating the provision of affordable housing 'exception sites' in accordance with CS Policy H2 and national policy to make up the shortfall?** If so, why is there a cross-reference to policies WH01 and 02 which apply to sites for mixed open-market and affordable housing? The last bullet point in policy WH03 would also not apply. *The Herefordshire DM section make this point.* Proposed change: Delete references to Policies WH01 and WH02 and bullet 4. Please consider Policy WH03 for application with exception sites.

Q22. Has any analysis been undertaken of the effect of the criteria in Policy WH01 on the potential for the identification of exception sites? *We would anticipate that the policy statement set out in WH01 would apply.*

Q23. If it is not the intention that policy WH03 should provide for exception sites what is its purpose? *The determination of local occupancy criteria is a matter for the Local Housing Authority, not the Planning Authority.* In the absence of a local **needs survey what is the evidential basis for a 'preference' for shared equity/shared ownership units?** *As set out above we have no evidence of an immediate need for affordable housing but would like to leave the option open in the policy framework should it become necessary at a future time.*

### Policy WH04

Q24. Re-use for any type of development? Are all three bullet points intended to apply to all proposals? *If so, as the representation from the DM section indicates, the second bullet point in this policy suggests that the re-use of rural buildings is only to be permitted if there is a positive contribution to rural business. That does not accord with national policy or CS Policies RA3(4) and RA5 which permit residential use.* Is there a local policy justification based upon robust and credible evidence to suggest that national or strategic local plan policy should not apply? Proposed change: Delete bullet 2 of policy WH04. This change is also in accord with discussions by WGPC members 16/07/17 to 19/07/17 reference this document,

## Wyeside NDP 2011 – 2031: Consultation Statement

---

concerning re-use for housing of local people and for affordable housing in the future. For which a demand is anticipated, although not yet verifiable.

*The strategic planning team of Herefordshire Council make a point about the overlap of this policy, and other NP policies, with those in the adopted CS. The purpose of an NP policy should be to add local detail, justified on the basis of there being a particular requirement within the NP area. The Development Plan must be read as a whole but if an NP policy post-dates that of the adopted local plan the NP policy will take precedence.*

Q25. What is the justification for the 7<sup>th</sup> bullet point relating to active travel? See Q17. There is no such requirement in national or local plan policy for the re-use of existing buildings. See comment above. This policy was added at the request of a third party following Regulation 14. Proposed change: Delete active travel bullet 7.

### Policy WH05

Q26. Is it intended that this policy should apply only to new-build dwellings? Yes. Policy WH04 deals with re-use.

Q27. The policy is significantly more restrictive than either CS Policy RA3 or the NPPF paragraph 55. Is there a particular local justification for taking such a stance? It is the only Wyeside policy that allows development of new properties outside the village centres or from re-use of rural buildings, and our overriding concern is the protection of the rural environment. WGPC is open to consideration of alternative conditions that support protection of the rural environment.

Q28. *The third bullet point is of a slightly different nature to the preceding two. What is meant by the term 'neutral or positive environmental impact'? What factors are to be taken into account, how are they to be measured? Now it is understood that cross-referencing of policies is not required (see note above where we were advised to include cross referencing) this bullet together with all other cross references will be deleted.* Proposed change: Delete bullet 3 of WH05.

*This policy, along with WH04 and WHD01 and 02 includes a cross-referenced requirement to comply with policy WE01. Such cross-references are unnecessary and add nothing to the plan. See response to question 28.*

### Policy WHD01

Q29. *The wording of this policy does not seem quite right. Should it be 'Proposals for the erection of new buildings will be permitted provided the following requirements are met:?' Government policy requires a positive approach to facilitating development. That means policy wording which indicates that development is to be permitted unless ..., not that it will only be permitted if..* Proposed change: Delete first sentence of Policy WH01. Replace with; "Proposals for the erection of new buildings will be permitted provided the following requirements are met:"



Q30. Is there a local justification for the very restrictive nature of the first bulleted requirement in this policy? Is not the fourth bullet sufficient to allow a proper assessment of the effect of a building on the character of an area? Are there no existing buildings of more than two storeys? **Proposed change: Delete "the new building will be of one or two storeys and of a scale which matches its surroundings." from the fourth bullet.** If we go back a few 100 years there are a small number of manor houses and farms of three storeys scattered around the countryside.

Q31. Agricultural and Business Buildings. Would the reference to prior approval be better placed in the accompanying text in recognition of the permitted development rights granted by the Government? **If the reference to prior approval is placed in the accompanying text, rather than within the policy statement, would that not weaken the application of the policy "in law"?**

See Qs 17 and 25 about **the 'active travel' criterion**. Justification? Realistic? See also Q4b. **Proposed change: All active travel bullets to be deleted.**

### Policy WHD02

Q32. Is the criterion relating to the provision of SuDS intended to apply only for new-build, as distinct from the re-use of existing buildings? **The term 'new development' is somewhat ambiguous, all development is new.** We have inserted it in Policy WHD02 because we understood it applies to all new build whether all new or part of an existing property. Please advise required action.

## Section 5. Environment and Heritage

### Policy WE01

**The first part of this 'policy' is not policy at all but is an explanatory note for it.** Such notes should not be within a coloured policy box but kept within the explanatory text. It is also not good practice to identify exceptions to policy within a policy. **Proposed change: Delete explanatory note from Policy WE02 statement and insert in explanatory text.**

Q33. The restriction of development within 100m. of the River Wye SAC may have derived from a representation by Natural England but what is the justification for the identification of such a specific exclusion zone? *It may be necessary to go back to Natural England for further justification of this provision.*

From: Underdown, Rebecca (NE)

[<mailto:Rebecca.Underdown@naturalengland.org.uk>]

Sent: 20 July 2017 13:27

To: [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)

Subject: Clarification/justification for NE's response (Herefordshire) Staunton on Wye NDP

Hello John,

**I've had a look at the query below and have the following comments to make, which will hopefully clarify the issue.**

## Wyese NDP 2011 – 2031: Consultation Statement

---

In Natural England's response to the Pre-Submission consultation for Staunton-on-Wye Development Plan, dated 19<sup>th</sup> December 2014, we advised the following;

*Disturbance to otters*

***"To prevent disturbance to otters, the Local Plan HRA advised no development should take place within 100m of the River Wye SAC. We advise that this must be carried through to this Neighbourhood Plan (NP) as detailed below.***

*To ensure that there is no likely significant effect (LSE) to the River Wye SAC from the Neighbourhood Plan, the policies within the plan need to be strengthened, otherwise the Neighbourhood Plan will not be able to proceed until the Local Plan-Core Strategy is adopted. We therefore advise an additional environmental policy must be included in the Plan which specifically prevents any LSE and protects and enhances the European site, specifically excluding development within 100m of the SAC. This policy should be cross referenced to policies 3,4 B2,B3,B4 and B5."*

One of the notified features of the River Wye SSSI/SAC is otters, and measures will have been put in place to protect the integrity of the SAC from development and prevent any adverse effects.

In Natural England's further response to the Neighbourhood Plan Submission Draft, dated the 27<sup>th</sup> March 2015, we advised that policy SOWG 1 be strengthened, by adding in the wording from the **Herefordshire Council Core Strategy Plan HRA**, "**no development will be permitted within 100m of the boundary of the River Wye SAC.**"

We would emphasise that the above is related to species protection.

It has been noted that this has been carried through to the Staunton on Wye Neighbourhood Plan policy SOWG1, Sustainable Water Management, which is in conformity with Local Plan policy SD3, Sustainable Water Management and Water Resources. For any further information regarding flooding, we would recommend contacting the Environment Agency.

**With regards soakaways and PTP's, guidance was published by Natural England in September 2016.** Further information and up to date guidance can be found at the link below. This guidance also refers to the standoff required between soakaways and the River Wye SAC and tributaries .

[Development of a Risk Assessment Tool to Evaluate the Significance of Septic Tanks Around Freshwater SSSIs.](#)

Kind Regards,

Rebecca

Rebecca Underdown

Lead Advisor

Sustainable Development

Natural England



# Wyese NDP 2011 – 2031: Consultation Statement

---

Parkside Court,

Hall Park Way

Telford,

TF3 4LR

020 822 56403

<http://www.gov.uk/natural-england>

Ends...../

*The inclusion of a cross-reference to a specific policy within the NPPF introduces in-built obsolescence to the plan because Government policy can change. It is certainly not appropriate to include an ISBN number. Proposed change: Delete "March 2012, ISBN: 978-1-4098-3413-7"*

Q34. Why is it necessary to include points 3 and 4 when these are to be found in other policy documents? *The NPPF represents Government policy but it does not have the same status as that of a development plan. Reference to the Waste Core Strategy could be taken as a provision relating to waste, which is precluded by statute from Neighbourhood Plans. Points 3 and 4 were inserted following Regulation 14 advice from third parties. Proposed change: Delete "and the Waste Core Strategy (WCS)"*

Policy WE02

*Although this policy is clearly related to Environment Objective 3 there is actually very little in the plan to justify the inclusion of such a detailed policy, especially the somewhat prescriptive nature of individual criteria.*

**The "Vision Statement" on page 8 of the plan states: "To ensure that the special characteristics of the villages within the five Parishes that residents know and love, including their rural feel, historic buildings and relationship with the surrounding countryside, are enhanced and protected" this statement ripples through the objectives in the plan and is reflected in the policies.**

Q35. *This policy commences 'All new development proposals ...' (repeated in bullet point 2) but that would include minor, householder, developments. Is this intended? If not, to what types of development would it be considered appropriate to apply this policy? Proposed change: insert "excluding minor, householder developments" after "All new development proposals".*

Q36. Sixth bullet point. Local species of what? **Proposed change: insert "plant" after "The planting of local" in bullet 6.**

Q37. Penultimate point. Orchards. Is there a local justification for the inclusion of this policy provision? **Why is there a requirement to provide 'an equivalent range of varietal fruit species'? How feasible is such a requirement? How can it be 'of at least an equivalent size to that which has been lost'? In most cases, land will have been acquired sufficient only to allow the proposed development, such as housing, with some incidental landscaping areas, but it would seem unlikely that a replacement area for an orchard would be 'within the ownership or control of the**

*applicant'*. This policy is intended to ensure thriving orchards are not used for development. The suggested wording is meant to be a deterrent to its use as a development site, as they are a primary source of income to the county. However, in Autumn 2016 production of apples exceeded demand by 20,000 tonnes. Consequently, some orchards are likely to be returned to general agriculture use. Once such land ceases to be an orchard it would not be protected under this policy, which whilst not perfect may be something we have to accept. If the objective could be achieved by alternative means WGPC is open to such a consideration.

### Policy WE03

Q38. All new development? (see Q33) **Proposed change: insert "excluding minor, householder developments" after "Proposals for all new development proposals".**

Q39. Bullet point 2. Does this mean that an existing open space which is contiguous to a village centre is not protected from development? *The only open space that is considered to be at risk because it is contiguous to a village centre are the orchards and land leading to Bredwardine bridge, and this has been identified as a green space and clearly marked on the Bredwardine Policy map.*

Q40. **How is an applicant to know what are the green spaces and the 'views and vistas valued by residents'? Why are these not identified in the plan, i.e. on the Policies Map?** *Wyside is generally low lying with views of a ridge to the west that lies mainly within the boundaries of the parish of Dorstone, with the exception of a slope on the east facing side of the ridge which is within the boundaries of the parish of Bredwardine. This ridge is serviced by a very limited supply of spring water which has constrained development to a few scattered properties that do not encroach on the view, and provision of a mains water supply is considered uneconomic. The only other significant view within Wyeside is that of Bredwardine bridge and surrounding orchards which has been identified as a local green space within the policies. Views across the river belong to the Staunton-on-Wye and Brobury parish, and again are outside the Wyeside Group of parishes. In addition, any proposed new developments on the approaches to the ridge (not visible in the view) would not be contiguous to village centres. The NDP policies also provide protection for the surrounding orchards.*

Q41. **Is there a difference between a 'green space' and a 'local green space'? Does not the 'designation' of a Local Green Space require a policy in its own right? Perhaps extracted from policy WH01?** *Is it intended that the policy set out in paragraph 78 of the NPPF should be applied in this area? The NPPF, paragraph 77, sets out strict criteria which must be met before an area can be designated as Local Green Space. What is the justification for the designation in terms of the criteria in paragraph 77? See response to Q13, above.*

### Policy WE04

Q42. **Are the 'historical buildings' one and the same as those listed in paragraph 5.3 of the plan and Appendix 6 as 'heritage assets'?** *Yes.*

## Wyeside NDP 2011 – 2031: Consultation Statement

---

Q43. National and local policy does not preclude the installation of solar panels on historic (listed) buildings but is subject to an assessment of harm to the heritage asset. Are there local circumstances to justify the stance taken in first bullet point of this policy? **Proposed change: Delete "Solar panels are not permitted on roofs of historical buildings. However, ground based solar panels will". Insert: "Solar panels are permitted on roofs of heritage buildings if an assessment proves that there will be no harm to the building. Ground based solar panels will also"**

### Policy WE05

*A Neighbourhood Plan can only include policy for the development and use of land, that is to guide decisions under the Planning Acts, not other legislation.*

*The title of this policy is repeated in the first bullet point. The second bullet point in this policy includes explanatory text which needs to be separated out. There is no point in including a 'policy' which simply provides a cross-reference to Core Strategy policy.*

Q44. Is it accepted that Policy WE05 should be modified to provide a simple statement of the essential policy considerations relating to sewerage and water supply? **Yes, it is. The wording and request to include it came from DCWW. Your advice on the wording would be appreciated**

Section 6. Facilities and services.

### Policy WF01

*It is not apparent that regard has been had to national policy, as expressed in paragraph 74 of the NPPF, nor is there consistency with CS policy (SC1 and OS3), which does not preclude the development of open space where it is demonstrated that the facility is no longer required or may be replaced by a facility which is at least equivalent to that which is to be 'lost'.*

Q45. Should policy WF01 include an additional provision to more closely reflect national and local plan policy? Are there particular reasons why such a policy should not apply in the Wyeside NP area? **Proposed change: after "permitted" insert: "except where it is demonstrated that the facility is no longer required or may be replaced by a facility which is at least equivalent to that which is to be 'lost'."**

### Policies WF02 and WF03

Q46. **Both of these policies state that 'applications ...will be encouraged'**. How? **By active involvement of the WGPC if an opportunity arises.**

Note: Additional questions below received 19 July 2017.

**Q47. With regards to the 'village centre for purpose contiguous development', please could you explain the following:**

The circles on the policies maps are around the community buildings rather than what might be regarded as the geographical centres of the village. What factors or criteria **has been used to decide where the 'centre' should be?**

## Wyese NDP 2011 – 2031: Consultation Statement

---

The selection of the centre(s) for each village had to comply with five factors:

1. The location had to be within an area of the village that was considered to be the centre, as defined by an acceptable property grouping density, and contiguous to the other properties within the grouping.
2. It had to be easily recognisable by anyone, including strangers to the area.
3. Not capable of more than one interpretation.
4. Simple and straightforward to apply.
5. Of a permanent nature and unlikely to change.

Adoption of the geographical centre as the datum point was considered but would have required installation of permanent markers. These can disappear with time, and would not easily be found by strangers. In addition, in cases where village properties are widely dispersed the geographical centre may not have been within an appropriate grouping of properties.

Q48 Policy WH05.

- a. How is policy WH05 intended to be interpreted against WH01? This policy is intended to be relevant to agricultural workers or wardens, etc., that are required to be resident within the holding in which the work is to be done to comply with requirements in their employment contract.
- b. How is policy WH05 applied outside the five village centres? Where does the 'open countryside' apply? An example may be a park, forested area or nature reserve, where it makes sense to provide housing within the work environment, **because of the potential for duties to be 24/7. It was included as an "in case scenario" with no actual examples at this time.**

Note: The policy maps setting out potential development sites can be provided separately on request and included in the information to the Examiner.

-----Original Message-----

From: Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>

To: Samoyedskye <[Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)>

Sent: Mon, Jul 24, 2017 01:12 PM

Subject: RE: Wyese Group - NDP - Response to Examiners Questions

Dear Alison,

Thank you for the responses.

It should be borne in mind that anything submitted to the examination cannot be anything which can't be placed in the public domain. The examiner's queries and the PC response will need to be placed on the website either during the examination or upon its conclusion.

With this in mind, would you like to reconsider the submission as the examiner may not accept information which cannot be made public.

Kind regards

# Wyese NDP 2011 – 2031: Consultation Statement

---

Sam

-----Original Message-----

From: Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>

To: Samoyedskye <[Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)>

Sent: Mon, Jul 24, 2017 12:52 PM

Subject: FW: Wyese Consultation Statement

Dear Alison,

Please see the note below from the Examiner.

*Unfortunately the submitted Consultation Statement is not fully compliant with Regulation 15(2). Although all of the comments received from stakeholders have been analysed with responses given, there are no details of the 'persons and bodies consulted' nor an indication as to how the stakeholders were consulted. There should be a list of all of the statutory consultees and copies of consultation letters/e-mails sent to them.*

*Please could I have copy of the relevant lists/letters and e-mails so that I can say I have checked them out even though they were not (as they should have been) included in the Consultation Statement itself.*

Please could you send me copies of the information the Examiner has requested as soon as possible so this part of the examination can be concluded. If there are any issues, please let me know.

Kind regards

Sam

**From:** John Darbyshire [mailto:[jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)]

**Sent:** 25 July 2017 15:17

**To:** Samantha Banks <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>

**Cc:** samoyedskye@aol.com

**Subject:** RE: Wyese Consultation Statement

Hello Sam

Please find attached the list of Statutory Consultees and copies of correspondence.

Best wishes

John

John Darbyshire

The Greens, Bredwardine

Herefordshire HR3 6BZ

Email: [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)

Tel: 01981 500711

Mob: 07793 158538

Note: The statutory list of consultees and copies of correspondence have been included in the updated Consultation Statement.

## Wyeside NDP 2011 – 2031: Consultation Statement

---

**From:** John Darbyshire [mailto:jc.darbyshire@gmail.com]  
**Sent:** 25 July 2017 15:37  
**To:** Samantha Banks <sbanks@herefordshire.gov.uk>  
**Cc:** samoyedskye@aol.com  
**Subject:** RE: Wyeside Group - NDP - Response to Examiners Questions

Hello Sam

I have permission from various parties for the information in the attached document (and the other two site maps sent in the original email which are unchanged and are therefore not included in this response) to be placed in the public domain. On the understanding that such publication will include the statement: These sites are indicative only, of the sort of places where development might be acceptable, and will be subject to a consultation process with landowners, Wyeside residents and the WGPC.

Hope this helps.

PS. There was an error in the naming of a lane in the original document sent to you. I attach a corrected version.

Thank you

Best wishes

John  
John Darbyshire  
The Greens, Bredwardine  
Herefordshire HR3 6BZ  
Email: [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)  
Tel: 01981 500711  
Mob: 07793 158538

-----Original Message-----

From: Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>  
To: Samoyedskye <[Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)>  
Sent: Thu, Aug 3, 2017 07:43 PM  
Subject: Further supplementary for Wyeside

Dear Alison,

Thank you for the additional material which you and the group have supplied to the examiner during the Wyeside NDP examination.

The examiner still has a number of queries regarding the practical implementation of Policy WH01 and therefore I enclose a number of additional questions which the examiner would like the group to respond to.

Responses have been requested by 11 August if possible, please could you give me an indication by return of email whether this is going to be possible.

# Wyeseide NDP 2011 – 2031: Consultation Statement

---

I will be on leave from the 7 to the 21 August, therefore please could you send any response to the team email at [neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk) so a member of the team will be able to forward them to the examiner without delay.

I will be in the office tomorrow (Friday) if you wish to discuss the above.

Kind regards

Sam

Attachment:

EXAMINATION OF THE WYESIDE NEIGHBOURHOOD PLAN

## **Examiner's further supplementary note and questions relating to the implementation of policy WH01**

1. As the result of representations made to the draft plan under Regulation 14 a number of amendments were made to policy WH01. I am obliged to the WGPC for their acknowledgement that to have proper regard to national practice guidance, and hence meet the basic condition, it is essential that the policy itself should be clear and not open to misinterpretation either by the decision-maker or the plan-user. To that end, they have responded to my earlier questions by providing more detail the manner in which it is envisaged that Policy WH01 should be interpreted by the Local Planning Authority when taking decisions on planning applications for housing development. However, this gives rise to some further questions.

2. I note the WGPC suggestion that a supplementary guidance note be prepared to explain in more detail how the policy might be applied. However, although the Parish Council would be free to produce such a note there is no statutory provision for supplementary guidance to Neighbourhood Plans, unlike Local Plans. It would be possible to include such detail in an annex or appendix to the plan but that would cause delay because it would need to be consulted upon. Nevertheless, it is important to ensure that the policy as worded in the draft plan does not have any unintended consequences and that any modifications to it that I might recommend would achieve what is sought by the WGPC and would command community support. The meaning of words used in planning policies can be open to close scrutiny especially when decisions are challenged in the Courts.

3. A critical element aspect of policy WH01 is the requirement in the second bullet point of the policy that proposals for (housing) development should be on land which **'is contiguous to the village centre(s) ...'** It follows that a clear **understanding of the concept of a 'village centre' and what is 'contiguous' with it is crucial.** The village centre(s) are shown on the Policies Maps by means of red circles which, it transpires, have been drawn around buildings which have a community function: the Red Lion Public House in Bredwardine; churches in Tyberton, Blakemere and Preston Court and the village halls in Preston and Moccas



(Old School Lane). The exception is Moccas War Memorial at the cross-roads which has its own policy implications, as discussed below.

4. **The dictionary definition of the word 'contiguous' is 'touching, adjoining, next in order, neighbouring'. It appears to me from reading the WGPC response, and looking at the plans provided of sites which are considered by the WGPC as having potential for development within the terms of the policy, that the wording within the second bullet point of the policy does not accurately describe the intended approach. That is because the possible development land is not, for the most part, contiguous with the red circles identified on the Policies Maps as the village centres. The WGPC response to my question 10b. talks in terms of permitting development adjacent to groups of houses which are identifiable as being clustered, however loosely, around the red circle on the Policies Map, that is within groups of houses which are contiguous with one another. The diagrams in Figure 7 on page 21 are a helpful illustration of the concept. It is notable, that the text at the very bottom of that page, under the emboldened heading for Figure 7, which appears to be a definition of the term '*Development Contiguous to a Village Centre*', more closely reflects the WGPC response to my Q10b. There has to be consistency to avoid any misinterpretation.**

Question 1: Would a wording for the policy reflecting the definition under Figure 7 assist in identifying land suitable for housing development? For example: ***...contiguous to the village centre, that is on land which immediately adjoins the centre as shown on the Policies Maps or is within or abuts a group of buildings which is contiguous with the centre .*** ***(Note that it is not necessary for the word 'center(s)' to be expressed as a plural because an application could only relate to one centre at a time)***

5. This suggested wording would obviate the need to qualify the statement by **a reference to 'free standing, individual or groups of dwellings which are obviously separate from the village centre.'** because any land which did not immediately adjoin the centre or abut a contiguous group would, by definition, be separate from it. It is also necessary to ensure **that what is conventionally termed 'infill development' would also be permitted under the policy.**

6. An alternative interpretation of the wording in Policy WH01 would be that **the 'village centre' is not the red circle as shown on the Policies Map but** incorporates all of the existing development which might be regarded as being contiguous with it. The wording within the existing policy would then more closely reflect the position described in the WGPC response statement but it would not fit with the **diagrams in Figure 7 or the footnote which only make sense if the 'centre'** is a single point.

7. The policy has to be worded so that it can be applied equally to all of the settlements within the Neighbourhood Plan area. In that context, I have no difficulty in relating the policy to possible development in the main village of

Preston-on-Wye or Bredwardine, especially with the specific qualification relating to Church Lane orchards. However, it is more problematic when applied to the smaller villages of Tyberton and Blakemere where the churches are somewhat separate from existing development with none which might be regarded as **'contiguous' with those centres. The church by Preston Court is also identified as a 'centre' but is in a completely rural location with only farm buildings and Preston Court adjacent.** The latter is difficult to reconcile with the criteria for the identification of centres given in response to my supplementary questions (Q47 in the WGPC response statement).

Question 2: Although there are other criteria within Policy WH01 which provide for consideration of the effect on character etc. is it considered appropriate, given the limited scope for development in Tyberton, **Blakemere and Preston Court, to identify 'villages centres' there,** thereby applying the second bullet point in Policy WH01 to those centres? **How would that 'contribute to sustainable development'?**

8. The identification of a second centre at Moccas as being the War Memorial at the cross-roads is inconsistent with the **other 'centres' in that it is not any sort of community building nor is it closely related to any area of development except the small area of ribbon development extending westwards along the southern side of the B4352.** In particular, there is no existing development on three sides of the **'centre'. Under the second bullet point of Policy WH01 as submitted those open fields would be contiguous with the village centre and, therefore, could under pressure for development. I note that following the Regulation 14 consultation the words 'where land on the opposite side of the road from a building designated as the centre of a village is a green space (no houses having been built in that location) no housing development will be allowed in that area.'** were deleted from the policy.

Question 3: Have the potential implications of the deletion of the policy reference to preventing housing development on the opposite side of the road from the village centre been fully considered especially in terms of the potential **for development around the 'centre' of the Moccas War Memorial?**

9. As I now have the benefit of information on the site which have been considered by the WGPC as having potential for housing development within the terms of Policy WH01, it brings into question the seventh bullet point in the policy.

Question 4: Should the requirement in the seventh bullet point of Policy WH01 for **development to 'relate directly to the existing built form' especially 'the infill character of existing built-up frontage'** be but an example or is the criterion appropriate at all given that criterion 5 would protect character?

# Wyeside NDP 2011 – 2031: Consultation Statement

---

John Mattocks  
Examiner  
03.08.17

-----Original Message-----

From: Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>  
To: Samoyedskye <[Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)>  
Sent: Thu, Aug 3, 2017 09:07 PM  
Subject: Wyeside, Local Green Space

Dear Alison,

I have received an additional query from the Examiner regarding the Local Green Space in Bredwardine.

The Examiner has said;

*'As I pointed out in my Question 41 the criteria for the identification of such areas in paragraph 77 of the NPPF are strict. There has to be very specific justification and evidence to support any designation. I'm sure the area is regarded as important by local people but I cannot find any indication that the public were asked specifically about it and there is no mention of it at all within the text of the plan. It simply appears as a statement within policy that the area is 'designated' and shown on the Policies Map. There is no justification at all.*

*For designation the area has to be 'demonstrably special' to the local community and satisfy ALL of the criteria in paragraph 77 of the NPPF as elaborated upon in the PPG.*

*This means that unless I am provided with evidence on the factors which justify 'designation' as LGS I will not be able to conclude that adequate regard has been had to national policy or guidance and I will have to conclude that such designation does not meet that basic condition and recommend deletion.'*

With this in mind, please could you provide the required justification in line with para 77 of the NPPF as to why the Local Green Space in Bredwardine has been designated.

I have enclosed the tests for your convenience

- Reasonably close proximity to the community it serves
- Demonstrably special to a local community and hold a particular local significant for example beauty, historic significance, recreation vale, tranquilly or richness in wildlife
- Local in character and not an extensive tract of land

Please could this be supplied in the same timescales as the earlier requested responses, ie by the 11 August

If you have any problems, please contact Karla Johnson, senior officer within my team, as I will be on leave until 21 August.

Kind regards

Sam

## Wyese NDP 2011 – 2031: Consultation Statement

---

**From:** [samoyedskye@aol.com](mailto:samoyedskye@aol.com) [<mailto:samoyedskye@aol.com>]  
**Sent:** 04 August 2017 12:38  
**To:** Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>  
**Subject:** Re: Wyese, Local Green Space

Dear Sam

I have been in touch with John and he believes that he will be able to provide answers to both of your e mails by 11th August.

Thank you

Kind regards

Alison

**From:** [samoyedskye@aol.com](mailto:samoyedskye@aol.com) [<mailto:samoyedskye@aol.com>]  
**Sent:** 11 August 2017 13:00  
**To:** [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)  
**Subject:** Re: Responses to the Examiner's Questions

Hi John

I have sent the documents to HC. I will send to WGPC on main computer later today.

Many thanks for all your research and work on the responses.

Kind regards

Alison

**From:** [Samoyedskye@aol.com](mailto:Samoyedskye@aol.com) [<mailto:Samoyedskye@aol.com>]  
**Sent:** 11 August 2017 18:56  
**To:** [francisrst@hotmail.co.uk](mailto:francisrst@hotmail.co.uk); [dennis\\_price@btconnect.com](mailto:dennis_price@btconnect.com); [whittallmoccas@gmail.com](mailto:whittallmoccas@gmail.com); [jeffnewsome@hotmail.co.uk](mailto:jeffnewsome@hotmail.co.uk); [dockerdale@googlemail.com](mailto:dockerdale@googlemail.com); [david@conveniencecompany.com](mailto:david@conveniencecompany.com); [jeanpugh@fsmail.net](mailto:jeanpugh@fsmail.net); [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com); [simon@raven-cottage.com](mailto:simon@raven-cottage.com); [willwhittall@gmail.com](mailto:willwhittall@gmail.com); [ashleymithengineering@gmail.com](mailto:ashleymithengineering@gmail.com); [suecrossend@gmail.com](mailto:suecrossend@gmail.com)  
**Subject:** Responses to the Examiner's Questions

Dear Councillors

The responses, as attached, have been sent to the Planning Authority today for them to send to the examiner on behalf of the WG.

The Examiner's further supplementary note and questions document relating to the implementation of policy WH01 identifies difficulties applying "Development contiguous to a village centre" to the communities of Blakemere, Tyberton and Preston Court for various reasons, you will see in the text. It is therefore proposed that these three communities should have small scale development enabled and the "Development contiguous to the

# Wyese NDP 2011 – 2031: Consultation Statement

---

village centre” should only apply to the three main villages of Bredwardine, Moccas and Preston-on-Wye centres. This is consistent with all three of the smaller communities having been identified as possible locations for development within the draft plan that successfully completed the consultation process. The response also requests the Examiner to advise us on suitable wording to achieve this outcome.

Thank you

Kind regards

Alison

Attachments: [Note responses are highlighted in blue.](#)

Attachment 1: EXAMINATION OF THE WYESI DE NEIGHBOURHOOD PLAN

## **Examiner’s further supplementary note and questions relating to the implementation of policy WH01**

5. As the result of representations made to the draft plan under Regulation 14 a number of amendments were made to policy WH01. I am obliged to the WGPC for their acknowledgement that to have proper regard to national practice guidance, and hence meet the basic condition, it is essential that the policy itself should be clear and not open to misinterpretation either by the decision-maker or the plan-user. To that end, they have responded to my earlier questions by providing more detail the manner in which it is envisaged that Policy WH01 should be interpreted by the Local Planning Authority when taking decisions on planning applications for housing development. However, this gives rise to some further questions.

I note the WGPC suggestion that a supplementary guidance note be prepared to explain in more detail how the policy might be applied. However, although the Parish Council would be free to produce such a note there is no statutory provision for supplementary guidance to Neighbourhood Plans, unlike Local Plans. It would be possible to include such detail in an annex or appendix to the plan but that would cause delay because it would need to be consulted upon. Nevertheless, it is important to ensure that the policy as worded in the draft plan does not have any unintended consequences and that any modifications to it that I might recommend would achieve what is sought by the WGPC and would command community support. The meaning of words used in planning policies can be open to close scrutiny especially when decisions are challenged in the Courts. [The examiner’s proposed change of wording to bullet 2 of policy WH01 below, addresses WGPC bullet 1 response to Q10b, relating to infill development. Bullet 2 is also unlikely to apply if bullet 2 of WH01 only applies to the three larger communities, because the potential development sites are all easily accessible and available. The request for consideration of supplementary guidance is therefore withdrawn, subject to your agreement.](#)

6. A critical element aspect of policy WH01 is the requirement in the second bullet point of the policy that proposals for (housing) development should be on

land which *'is contiguous to the village centre(s) ...'* It follows that a clear understanding of the concept of a 'village centre' and what is 'contiguous' with it is crucial. The village centre(s) are shown on the Policies Maps by means of red circles which, it transpires, have been drawn around buildings which have a community function: the Red Lion Public House in Bredwardine; churches in Tyberton, Blakemere and Preston Court and the village halls in Preston and Moccas (Old School Lane). The exception is Moccas War Memorial at the cross-roads which has its own policy implications, as discussed below.

7. The dictionary definition of the word 'contiguous' is 'touching, adjoining, next in order, neighbouring'. It appears to me from reading the WGPC response, and looking at the plans provided of sites which are considered by the WGPC as having potential for development within the terms of the policy, that the wording within the second bullet point of the policy does not accurately describe the intended approach. That is because the possible development land is not, for the most part, contiguous with the red circles identified on the Policies Maps as the village centres. The WGPC response to my question 10b. talks in terms of permitting development adjacent to groups of houses which are identifiable as being clustered, however loosely, around the red circle on the Policies Map, that is within groups of houses which are contiguous with one another. The diagrams in Figure 7 on page 21 are a helpful illustration of the concept. It is notable, that the text at the very bottom of that page, under the emboldened heading for Figure 7, which appears to be a definition of the term '**Development Contiguous to a Village Centre**', more closely reflects the WGPC response to my Q10b. There has to be consistency to avoid any misinterpretation.

Question 1: Would a wording for the policy reflecting the definition under Figure 7 assist in identifying land suitable for housing development? For example: *...contiguous to the village centre, that is on land which immediately adjoins the centre as shown on the Policies Maps or is within or abuts a group of buildings which is contiguous with the centre. (Note that it is not necessary for the word 'center(s)' to be expressed as a plural because an application could only relate to one centre at a time)*

Yes. The example text shown in italics at the end of question 1 above, based on text following figure 7 of the plan, does address potential inconsistencies set out in bullet 2 of WH01, and would be considered an improvement by WGPC. Thank you.

5. This suggested wording would obviate the need to qualify the statement by a reference to 'free standing, individual or groups of dwellings which are obviously separate from the village centre.' because any land which did not immediately adjoin the centre or abut a contiguous group would, by definition, be separate from it. It is also necessary to ensure that what is conventionally termed 'infill development' would also be permitted under the policy.

Accepted. Thank you.

6. An alternative interpretation of the wording in Policy WH01 would be that the 'village centre' is not the red circle as shown on the Policies Map but incorporates all of the existing development which might be regarded as being



contiguous with it. The wording within the existing policy would then more closely reflect the position described in the WGPC response statement but it would not fit **with the diagrams in Figure 7 or the footnote which only make sense if the 'centre' is a single point.** [The preference would be for the wording included in Question 1 and discussed in your item 5.](#) However, we are open to discussion on this point and [would welcome advice as it relates to your knowledge of planning policy.](#)

7. The policy has to be worded so that it can be applied equally to all of the settlements within the Neighbourhood Plan area. In that context, I have no difficulty in relating the policy to possible development in the main village of Preston-on-Wye or Bredwardine, especially with the specific qualification relating to Church Lane orchards. However, it is more problematic when applied to the smaller villages of Tyberton and Blakemere where the churches are somewhat separate from existing development with none which might be regarded as **'contiguous' with those centres. The church by Preston Court is also identified as a 'centre'** but is in a completely rural location with only farm buildings and Preston Court adjacent. The latter is difficult to reconcile with the criteria for the identification of centres given in response to my supplementary questions (Q47 in the WGPC response statement).

Question 2: Although there are other criteria within Policy WH01 which provide for consideration of the effect on character etc. is it considered appropriate, given the limited scope for development in Tyberton, Blakemere and Preston Court, **to identify 'villages centres' there, thereby applying the second bullet point in Policy WH01 to those centres? How would that 'contribute to sustainable development'?** [The probable small-scale development in these three centres is unlikely to make a significant contribution to sustainable development and therefore a case can be made, as you suggest, for not applying bullet 2 of WH01 to these three communities, whilst allowing small scale development where appropriate.](#) If you could recommend some wording to achieve this it would be appreciated. Thank you. We provide the following clarifications.

1. Further investigation has suggested that Preston Court is unlikely to see any development contiguous to the church centre, although some potential development is feasible away from the flood plain. The church was included in the draft plan for historical reasons, without a full discussion of its potential limitations. The church had been the centre of Preston-on-Wye since Saxon times. Where we perceive the centre to be now, based around the village hall, was originally a hamlet called Ploughfield which dates back to the 12c and became the preferred location for development because the area around the church is subject to risk of fluvial flooding.
2. Blakemere is unlikely to see any significant development as the local landowners have no interest in selling land for development, although an occasional development plot and some re-use of farm buildings may occur in the longer term.
3. Tyberton is also unlikely to see any significant development as further analysis has suggested that the potential sites for development are unlikely to convert as the local landowners again have no interest in selling land for development, although



an occasional development plot and some re-use of farm buildings may occur in the longer term.

Consequently, these three centres are unlikely to contribute significantly to the sustainability of the Wyeseide Group of parishes, and the potential development sites in the three main settlements of Bredwardine, Moccas and Preston-on-Wye are more than sufficient to meet the target requirement of 33 properties.

8. The identification of a second centre at Moccas as being the War Memorial at the cross-roads is inconsistent with the other 'centres' in that it is not any sort of community building nor is it closely related to any area of development except the small area of ribbon development extending westwards along the southern side of the B4352. In particular, there is no existing development on three sides of the 'centre'. The purpose of identifying the war memorial as a village centre was to enable development down Woodbury Lane behind the ribbon of development you mentioned that would connect the 300 years old settlement at the far end of the lane with this centre to create a more integrated village community. Unlike the other two main village communities Moccas has very little in the way of public footpaths and the intention would be to create public footpaths interconnected to Woodbury Lane and within the proposed development in compliance with RIBA best practice. Although not within the current plan in the longer term it is likely that the remaining part of the orchard to the East of the memorial (potential site for partial development from the village hall end in the current plan) will become developed linking the two centres of Moccas together. Under the second bullet point of Policy WH01 as submitted those open fields would be contiguous with the village centre and, therefore, could under pressure for development. I note that following the Regulation 14 consultation the words 'where land on the opposite side of the road from a building designated as the centre of a village is a green space (no houses having been built in that location) no housing development will be allowed in that area.' were deleted from the policy. This is a case of unintended consequences it was meant to apply to Bredwardine only, which was one of the reasons it was re-worded following Regulation 14.

Question 3: Have the potential implications of the deletion of the policy reference to preventing housing development on the opposite side of the road from the village centre been fully considered especially in terms of **the potential for development around the 'centre' of the Moccas War Memorial**? This wording was never intended to apply to land adjacent to the Moccas war memorial, as the land on the West side, North of the memorial is not open to the public and belongs to Moccas Court. The other two fields you refer to are an orchard and for general agriculture, part of one being included in the potential development sites nearest the village hall.

9. As I now have the benefit of information on the site which have been considered by the WGPC as having potential for housing development within the terms of Policy WH01, it brings into question the seventh bullet point in the policy.

Question 4: Should the requirement in the seventh bullet point of Policy WH01 for **development to 'relate directly to the existing built form'** especially **'the infill character of existing built-up frontage'** be but an example or is the criterion appropriate at all given that criterion 5 would protect character?

If you advise that the seventh bullet is not necessary as bullet 5 provides adequate cover for this requirement, WGPC would propose deleting bullet seven.

John Mattocks  
Examiner  
03.08.17

Attachment 2:

*'As I pointed out in my Question 41 the criteria for the identification of such areas in paragraph 77 of the NPPF are strict. There has to be very specific justification and evidence to support any designation. I'm sure the area is regarded as important by local people but I cannot find any indication that the public were asked specifically about it and there is no mention of it at all within the text of the plan. It simply appears as a statement within policy that the area is 'designated' and shown on the Policies Map. There is no justification at all.*

*For designation the area has to be 'demonstrably special' to the local community and satisfy ALL of the criteria in paragraph 77 of the NPPF as elaborated upon in the PPG.*

*This means that unless I am provided with evidence on the factors which justify 'designation' as LGS I will not be able to conclude that adequate regard has been had to national policy or guidance and I will have to conclude that such designation does not meet that basic condition and recommend deletion.'*

With this in mind, please could you provide the required justification in line with para 77 of the NPPF as to why the Local Green Space in Bredwardine has been designated.

I have enclosed the tests for your convenience

- Reasonably close proximity to the community it serves
- Demonstrably special to a local community and hold a particular local significance for example beauty, historic significance, recreation value, tranquillity or richness in wildlife
- Local in character and not an extensive tract of land

### **Bredwardine Orchards Local Green Space, on either side of Church Lane**

This being the orchard 'opposite the Red Lion' village centre, and the orchard bordered by Church Lane, the River Wye and the road running from the Red Lion to Bredwardine Bridge. In addition, the iconic views of Bredwardine Bridge and the River Wye from the footpath running through the orchard from the church to the bridge.

Both orchards are in close proximity to the Red Lion Hotel, the designated centre of Bredwardine village, with one being accessible immediately opposite the centre and the second 200 metres down the lane towards the church.

## Wyese NDP 2011 – 2031: Consultation Statement

---

The orchards are used by dog walkers as they are safe, accessible and enable dogs to be let off the lead. The orchard bordered by the river Wye and church lane has the Wye Valley walk footpath running through it and is the only river public access between the Welsh border and Hereford city. A distance of 20 miles by road and 30 miles by river. Consequently, it is well used by village residents and the general public as a recreational area. There are no other recreational areas within the village. In the summer months' it is used by sunbathers, those wishing to swim in the river, and is a canoe pick-up, stop off, and launch site.

The orchard opposite the Red Lion has a plaque set out at the gated access near the church with a map showing a footpath going around the borders of the orchard for use by the general public.

The two orchards are used for the church fete at the beginning of August and the village hall barbeque at the end of August. Classic car rallies have also been held there. The orchard bordering the river Wye and church lane is used as an overspill car park for events at the Church. There being no other parking facilities within an acceptable distance other than church lane which has limited parking facilities.

The orchards have an air of tranquillity and it is not unusual to find members of the public ambling through both orchards in search of a sense of peace and well-being, whilst enjoying the view along the river and of the bridge. The bridge is single track early eighteenth century with brick arches being one of only a few bridges of this type still in use in the county and is well known as an iconic view. Together with the two orchards the bridge forms a pastoral landscape that is often photographed and enjoyed throughout the seasons by the general public.

The Rev. Robert Francis Kilvert 1840 to 1879, who is famous for his diaries describing the life of ordinary people in Victorian times, resided at Bredwardine Rectory and was buried at Bredwardine churchyard, which is often visited by those on a Kilvert pilgrimage. The rectory can be viewed from Bredwardine bridge beside the river bank and is another iconic view that is often photographed. One of Kilvert's favourite walks, which has remained unchanged to the present day, commences at the rectory, goes through the orchard beside the river Wye that forms part of this local green space and crosses the bridge along the lane to Brobury.

This designated local green space is local in character and not an extensive tract of land.

Note: We propose adding this description to the plan text.

**From:** John Darbyshire [mailto:jc.darbyshire@gmail.com]

**Sent:** 11 August 2017 15:07

**To:** Alison Wright <samoyedskye@aol.com>

**Subject:** FW: Moccas

Hi Alison

I have a late update from Francis Chester-Master concerning land adjacent to the war memorial at Moccas. Please see the text in bold italics inserted in my email 8/08/17 below. Can you please pass this on for the Examiner's attention, together with this email and the history below.

Thank you

John

John Darbyshire  
The Greens, Bredwardine

# Wyese NDP 2011 – 2031: Consultation Statement

---

Herefordshire HR3 6BZ  
Email: [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)  
Tel: 01981 500711  
Mob: 07793 158538

**From:** Land Agent  
**Sent:** 11 August 2017 13:35  
**To:** John Darbyshire ([jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)) <[jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)>  
**Cc:** [whittallmoccas@gmail.com](mailto:whittallmoccas@gmail.com)  
**Subject:** FW: Moccas

Dear John

I have spoken to Owen today about your email below and I have added some brief comments to it to answer your questions.

Regards

**Land Agent**  
DIRECTOR



Chester Master Ltd  
Dolgarreg, North Road, Builth Wells, Powys, LD2 3DD  
Tel: +44 (0)1982 553 248 • Fax: +44 (0)1982 553 154

Visit our website on [www.chestermaster.co.uk](http://www.chestermaster.co.uk)



This is an email from Chester Master Ltd. The contents of this email are confidential to the ordinary user of the email address to which it was addressed and may contain legally privileged information. If you are not the intended recipient it may be unlawful for you to read, copy, distribute, disclose or otherwise make use of the information herein. Chester Master Ltd will accept no liability for the mistransmission, interference or interception of any email and you are reminded that email is not a secure form of communication. If you receive this in email in error, please accept our apologies and telephone us on +44 (0)1982 553 248 or email us on [admin@chester-master.co.uk](mailto:admin@chester-master.co.uk)

From: Owen Whittall [<mailto:whittallmoccas@gmail.com>]  
Sent: 11 August 2017 13:08  
To: Land Agent  
Subject: Fwd: Moccas

----- Forwarded message -----

From: **John Darbyshire** <[jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)>  
Date: Tue, Aug 8, 2017 at 12:30 PM  
Subject: Moccas

## Wyese NDP 2011 – 2031: Consultation Statement

---

To: Owen Whittall <[whittallmoccas@gmail.com](mailto:whittallmoccas@gmail.com)>  
Cc: Alison Wright <[samoyedskye@aol.com](mailto:samoyedskye@aol.com)>

Hi Owen

The examiner is asking whether we need to protect from development the spaces adjacent to the war memorial on the North side of the B4352, and either side of the road to the village hall. I attach the map provided by the land agent for reference. Can you please also update my knowledge as to the use of these two spaces? I think one is part of the Moccas estate and unlikely to be released for development and the other is an orchard, adjoining your property?

[FCM] Both fields are owned by the Moccas Estate. Driving up from the B4352 from the war memorial towards the village the field on the left is an orchard and the field on the right is an arable field. The Estate is keen to protect from development both the orchard and the part of the arable field between the war memorial and the plantation on the edge of the village that is not coloured red on the attached plan.

The land agent has offered the part of this space nearest the village hall for development see attached map.

Thank you

John

John Darbyshire

The Greens, Bredwardine

Herefordshire HR3 6BZ

Email: [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)

Tel: 01981 500711

Mob: 07793 158538

From: [jlatham@herefordshire.gov.uk](mailto:jlatham@herefordshire.gov.uk)

To: [Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)

CC: [sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)

Sent: 15/08/2017 08:27:42 GMT Daylight Time

Subj: additional question from the examiner - Wyese Group

Dear Clerk

Please see the below question from the Independent Examiner for the Wyese Group NDP.

# Wyese NDP 2011 – 2031: Consultation Statement

---

In the WGPC response to my question 16b. about the evidential basis some of the statements they make in paragraph 4.8 of the Wyese Neighbourhood Plan, they state the following:-

WGPC access to good “on the ground” historical data on local housing sizes (reflecting past demand) from local opinion surveys, and verification interviews with the target group of young people in Wyese and the surrounding parishes (for clarification of that need) set out in the Consultation Statement Young Farmers Club interviews 26 August 2014, (none of which were available to the needs assessment model) produces more reliable and accurate predictions than a needs assessment model.

(My underlining for emphasis)

I presume that the reference to this in the Consultation Statement is paragraph 2.6 but there is no mention anywhere of 'verification interviews'. Would you please ask the WGPC what was covered in those verification interviews and what conclusions were drawn from them.

If you could let us have the answer to this question as soon as possible I will forward it onto the examiner.

Kind regards

**Herefordshire.gov.uk**

**From:** John Darbyshire [mailto:jc.darbyshire@gmail.com]

**Sent:** 15 August 2017 12:15

**To:** jlatham@herefordshire.gov.uk

**Cc:** Samoyedskye@aol.com; Samantha Banks <sbanks@herefordshire.gov.uk>

**Subject:** RE: additional question from the examiner - Wyese Group

Dear James

Please see attached for sending on to the examiner in response to their request.

Best wishes

John

John Darbyshire

The Greens, Bredwardine

Herefordshire HR3 6BZ

Email: [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)

Tel: 01981 500711

Mob: 07793 158538

## **Attachment:**

**Comments in blue are additions for purposes of clarification:**

**Consultation Statement reference section 2.6 The Younger Generation stated:**

At the NDP Steering Committee meeting held on 6 August 2014 concerns were raised regarding the lack of comments from the younger generation and the importance of having a representative age spread for the comments data.

Whilst it was recognised that this probably reflected the preponderance of older people within Wyese, it was agreed that a “Planning for Real” team would attend the Young Farmers Club (YFC) barbecue event at Moccas on 26 August, to get a better understanding of the younger generation’s views. Their comments were included in the register of comments, and are set out in Appendix 1: Open Days – Public Comments and NDP Responses/Actions.

A particular concern was the lack of any evidence of demand for single bedroom housing from public events prior to the Young Farmers Club event 26 August. The GL Hearn Housing Market Model had predicted a requirement of 32.2% for 1 and 2 bedroom houses. This compared with an historical figure for all five communities of 2.7% for 1 bedroom homes and a further 16.7% for two bedroom homes. A total of 19.5%, well short of the 32.2% predicted by GL Hearn. The public events up to that time had suggested the shortfall against the needs assessment model was likely to be due to a lack of demand for single bedroom homes although the GL Hearn study did not split this out. A survey of Estate Agents in 2009 for the Golden Valley HMA had also confirmed that no one bedroom flats or houses were bought or sold over the time segment of six months analysed. A full explanation of this is set out on page 22, Section 4.8 of the draft plan.

Members of the YFC were specifically asked whether they wanted family accommodation or one bedroom homes. They responded that the need was for family accommodation and that there was no benefit in rural areas for one bedroom apartments. Their comments were not separated out from other public event responses that confirmed the lack of demand for 1 bedroom homes see below.

Consequently, the decision was taken to disregard the GL Hearn prediction whilst allowing for changes in demand with the following statement at the end of Section 4.8 on page 22 of the draft plan:

“Recognising that a predictive model such as that used by GL Hearn cannot reflect all the nuances that occur on the ground, a suitable mix of homes in terms of size, type and tenure that reflects the information on the ground and is supported by the questionnaire responses will be encouraged.

It is anticipated that two and three bedroom houses will form the majority of new houses with one bedroom houses being developed where a local need has been identified, or four bedrooms and greater where there is a perceived market demand”.

Examples of comments from **APPENDIX 1: OPEN DAYS – PUBLIC COMMENTS AND NDP RESPONSES/ACTIONS, commencing on page 23 of the Consultation Statement:**

There were 10 responses specifically requesting family accommodation most of these were from the YFC event, reference pages 24 to 61, see below. A further 18 requests were received for affordable housing on pages 24 to 32. In each of the latter cases the responders were discussing the need for bringing up families in the communities. Most of these came from the public events prior to the issue of the questionnaire and the YFC event. At this time, we were not attempting to confirm or otherwise possible demand for one bedroom homes as the historical data from the questionnaire which first raised concerns about the GL Hearn model was not yet available.



# Wyese NDP 2011 – 2031: Consultation Statement

---

There were no requests for single bedroom homes from any of the target groups at the public events or YFC event.

Page 24

Need to encourage young families with suitable homes and facilities – i.e. play area Lack of youngsters for the future of the village

Page 33

Housing Association bungalows – for young families not treated as retirement homes Section 4 - Housing (Affordable)

Page 42

Want to revitalise Bredwardine village and bring in younger families. This will require adequate facilities to attract them.

To encourage young families to the area we need very fast broadband (fibre optic) for internet connection. Without it people will be reluctant to settle here.

Page 46

Affordable Housing but also flexibility for local people and businesses to build homes in places that allow family and workers to live in the community where they have grown up or work.

Need to encourage young families with suitable homes and facilities – i.e. play area. Lack of youngsters for the future of the village.

Page 50

Housing for families needed (Tag placed in field NE of Moccas cross).

Page 54

More family housing wanted.

Page 56

Would like Housing where people can work and encourage families.

Page 61

Long term farming community families is key to the whole village network.

A further 18 requests were received for affordable housing on pages 24 to 32. As set out above all of these were responses in which the need for young families was being discussed. No requirement for one bedroom accommodation was identified.

**From:** John Darbyshire [mailto:jc.darbyshire@gmail.com]

**Sent:** 16 August 2017 11:59

**To:** jlatham@herefordshire.gov.uk

**Cc:** Alison Wright <samoyedskye@aol.com>

**Subject:** Policy WH05 - Housing in Open Countryside

Dear James

Can you please pass on the following to the Examiner?

# Wyese NDP 2011 – 2031: Consultation Statement

---

Regarding Policy WH05 – Housing in Open Countryside:

“Individual houses outside the five village centres will only be permitted in the following circumstances:

- Where it has been demonstrated that there is a functional and financial requirement for an agricultural worker’s dwelling on an existing or proposed holding;
- Where it has been demonstrated that there is a viable rural enterprise which requires an onsite dwelling;”
- In all the above cases the proposal will need to demonstrate safe access, neutral or positive environmental impact and compliance with policies WHD01 – New Build Design and WE01 - Environmental Restrictions on Development, below”.

Two actual examples of the application of the above policy, which were not mentioned in the original response to your questions, have been reported to members of WGPC. These are:

1. A farmer’s son working for his father getting approval to build a house on land that forms part of the farm for his own family.
2. A resident getting approval to build a property within fields used for pig farming to relocate his family to his place of work.

Thank you.

Best wishes

John

John Darbyshire

The Greens, Bredwardine

Herefordshire HR3 6BZ

Email: [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)

Tel: 01981 500711

Mob: 07793 158538

-----Original Message-----

From: Latham, James <[jlatham@herefordshire.gov.uk](mailto:jlatham@herefordshire.gov.uk)>

To: A Wright ([Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)) <[Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)>

CC: Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>

Sent: Fri, Aug 25, 2017 12:34 PM

Subject: FW: Wyese policy WE04

Dear Clerk,

Please see below the question from John Mattocks regarding the Wyese Group NDP.

Kind regards

**Herefordshire.gov.uk**

**James Latham**

**Technical Support Officer**

Neighbourhood Planning and Strategic Planning teams

# Wyese NDP 2011 – 2031: Consultation Statement

---

Herefordshire Council  
Plough Lane  
Hereford  
HR4 0LE

Tel: 01432 383617

Email: [jlatham@herefordshire.gov.uk](mailto:jlatham@herefordshire.gov.uk)

[neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk) (for Neighbourhood Planning enquiries)

[ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk) (for Strategic Planning enquiries)

Any opinion expressed in this e-mail or any attached files are those of the individual and not necessarily those of Herefordshire Council.

This e-mail and any attached files are confidential and intended solely for the use of the addressee. This communication may contain material protected by law from being passed on. If you are not the intended recipient and have received this e-mail in error, you are advised that any use, dissemination, forwarding, printing or copying of this e-mail is strictly prohibited. If you have received this e-mail in error please contact the sender immediately and destroy all copies of it.

**From:** John Mattocks Planning Services [<mailto:planning@jrmattocks.co.uk>]

**Sent:** 25 August 2017 12:05

**To:** Latham, James <[jlatham@herefordshire.gov.uk](mailto:jlatham@herefordshire.gov.uk)>

**Cc:** Neighbourhood Planning Team <[neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk)>

**Subject:** Fwd: Wyese policy WE04

James

I would appreciate it if someone would please pass on the query below to the WGPC as a matter of urgency. It is also not at all clear how the policy is intended to relate to HCS Policy SD2. The last part of that policy only permits 'wind power development' where a SITE is allocated in an NP with community support, which is Government policy. Potentially WNP Policy WE04 would permit 'small wind turbines' anywhere. There is a conflict.

Regards

John Mattocks

----- Forwarded Message -----

**Subject:** Wyese policy WE04

**Date:** Thu, 24 Aug 2017 18:06:11 +0100

**From:** John Mattocks Planning Services <[planning@jrmattocks.co.uk](mailto:planning@jrmattocks.co.uk)>

**To:** Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>

Samantha

I have virtually finished my report but looking at policy WE04 in more detail I find that I don't understand what the WGPC are trying to say in the second and third bullet points in Policy WE04. As worded it means that solar panel farms will only be permitted in or within 100 m. of the Wye Valley SAC, in high flood risk zones or the LGS and single small wind turbines will be encouraged in the same areas. I think they might mean that those developments will be permitted or encouraged generally but within those areas must comply with WE01 and/or WE03. If so, what

## Wyeside NDP 2011 – 2031: Consultation Statement

---

about WE02? I can't see what the policy is intended to achieve. I don't want to get it wrong. Clarification please.

Regards

John Mattocks

**From:** John Darbyshire [mailto:jc.darbyshire@gmail.com]  
**Sent:** 25 August 2017 15:22  
**To:** jlatham@herefordshire.gov.uk  
**Cc:** samoyedskye@aol.com  
**Subject:** RE: Wyeside policy WE04

Hello James

I have commented in blue against John Mattocks concerns below, but I am not sure that I fully understand his concerns. If John Mattock requires further clarification please let me know. I am uncontactable until Monday morning, after sending this email.

Best wishes

John

John Darbyshire  
The Greens, Bredwardine  
Herefordshire HR3 6BZ  
Email: [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)  
Tel: 01981 500711  
Mob: 07793 158538

**From:** [samoyedskye@aol.com](mailto:samoyedskye@aol.com) [mailto:samoyedskye@aol.com]  
**Sent:** 25 August 2017 12:41  
**To:** [jc.darbyshire@gmail.com](mailto:jc.darbyshire@gmail.com)  
**Subject:** Fwd: Wyeside policy WE04

Hi John

Further question just in.

Thank you

Kind regards

Alison

-----Original Message-----

From: Latham, James <[jlatham@herefordshire.gov.uk](mailto:jlatham@herefordshire.gov.uk)>  
To: A Wright ([Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)) <[Samoyedskye@aol.com](mailto:Samoyedskye@aol.com)>  
CC: Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>  
Sent: Fri, Aug 25, 2017 12:34 PM  
Subject: FW: Wyeside policy WE04

# Wyese NDP 2011 – 2031: Consultation Statement

---

Dear Clerk,

Please see below the question from John Mattocks regarding the Wyese Group NDP.

Kind regards

**Herefordshire.gov.uk**

---

**James Latham**

**Technical Support Officer**

Neighbourhood Planning and Strategic Planning teams  
Herefordshire Council  
Plough Lane  
Hereford  
HR4 0LE

Tel: 01432 383617

Email: [jlatham@herefordshire.gov.uk](mailto:jlatham@herefordshire.gov.uk)

[neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk) (for Neighbourhood Planning enquiries)

[ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk) (for Strategic Planning enquiries)

Any opinion expressed in this e-mail or any attached files are those of the individual and not necessarily those of Herefordshire Council.

This e-mail and any attached files are confidential and intended solely for the use of the addressee. This communication may contain material protected by law from being passed on. If you are not the intended recipient and have received this e-mail in error, you are advised that any use, dissemination, forwarding, printing or copying of this e-mail is strictly prohibited. If you have received this e-mail in error please contact the sender immediately and destroy all copies of it.

**From:** John Mattocks Planning Services [<mailto:planning@jrmattocks.co.uk>]

**Sent:** 25 August 2017 12:05

**To:** Latham, James <[jlatham@herefordshire.gov.uk](mailto:jlatham@herefordshire.gov.uk)>

**Cc:** Neighbourhood Planning Team <[neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk)>

**Subject:** Fwd: Wyese policy WE04

James

I would appreciate it if someone would please pass on the query below to the WGPC as a matter of urgency. It is also not at all clear how the policy is intended to relate to HCS Policy SD2. The last part of that policy only permits 'wind power development' where a SITE is allocated in an NP with community support, which is Government policy. Potentially WNP Policy WE04 would permit 'small wind turbines' anywhere. There is a conflict. [We have had no site requests for wind power development.](#) If SD2 relates to individual small wind turbines, [reference limitations of wind speeds in the plan, in addition to large wind turbine sites can we state: "Individual small wind turbines will be encouraged where they are supported by the community and are in compliance with HCS Policy SD2"?](#) If any site has to have been identified within the plan then we will need a statement that precludes wind turbine development, because no sites were identified during the public discussions, development and consultation phases of the plan.

Regards

# Wyeside NDP 2011 – 2031: Consultation Statement

---

John Mattocks

----- Forwarded Message -----

**Subject:** Wyeside policy WE04  
**Date:** Thu, 24 Aug 2017 18:06:11 +0100  
**From:** John Mattocks Planning Services <[planning@jrmattocks.co.uk](mailto:planning@jrmattocks.co.uk)>  
**To:** Banks, Samantha <[sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)>

Samantha

I have virtually finished my report but looking at policy WE04 in more detail I find that I don't understand what the WGPC are trying to say in the second and third bullet points in Policy WE04. As worded it means that solar panel farms will only be permitted in or within 100 m. of the Wye Valley SAC, in high flood risk zones or the LGS and single small wind turbines will be encouraged in the same areas. I think they might mean that those developments will be permitted or encouraged generally but within those areas must comply with WE01 and/or WE03. Policies WE01 and WE03 state that development should not occur within 100 metres of the Wye SAC or flood zones 2 and 3 or LGS. Therefore our understanding suggests compliance with these policies means development should not occur in those areas. All other areas are not restricted in this way. Although they should comply with WE02 which is meant to protect the rural country side. If so, what about WE02? I can't see what the policy is intended to achieve. I don't want to get it wrong. Clarification please.

Regards

John Mattocks  
From: [planning@jrmattocks.co.uk](mailto:planning@jrmattocks.co.uk)  
To: [samoyedskye@aol.com](mailto:samoyedskye@aol.com)  
CC: [sbanks@herefordshire.gov.uk](mailto:sbanks@herefordshire.gov.uk)  
Sent: 01/09/2017 13:13:58 GMT Daylight Time  
Subj: Report on the examination of the Wyeside Neighbourhood Plan

To Mrs Alison Wright  
Clerk to the Wyeside Group Parish Council

Dear Mrs Wright

I am pleased to confirm that I have completed my examination of the submitted Wyeside Neighbourhood Plan. As required by s10(7) of Schedule 4B to the Town and Country Planning Act 1990 please find attached a copy of my report into the examination in which I recommend that the plan, as modified, should be proceed to a referendum. I am simultaneously, also by this e-mail, submitting a copy of my final report to the Herefordshire Council who, as the Local Planning Authority, will be formally responsible for progressing the plan through the remaining statutory procedures.

For formatting purposes my report is in three files: a cover page, contents pages and the main body of the report.

I trust that my report is self-explanatory. Should there be any matters about which the Parish Council is not absolutely clear then I would ask that you raise them with the Herefordshire neighbourhood planning team

in the first instance who may then choose to communicate with me.  
Regards

John Mattocks

Neighbourhood Plan Examiner (NPIERS)

**Attachments 1, 2 and 3, below.**

### Wyeseide Neighbourhood Plan 2011 - 2031

Plan submitted for Examination

January 2017

Report to the Herefordshire Council on the  
Independent Examination of the draft Wyeseide  
Neighbourhood Plan 2011 - 2031

September 2017

---

Examiner: John R. Mattocks BSc DipTP MRTPI FRGS



Draft

<b>Contents</b>	<b>Page No(s).</b>
<b>0. Summary of main findings</b>	<b>1</b>
<b>1. Introduction</b>	<b>2 - 3</b>
Appointment	2
My role as an examiner	2 - 3
<b>2. Statutory compliance and procedural matters</b>	<b>3 - 6</b>
Human Rights Act and EU Obligations	5 - 6
<b>3. Preparation of the plan and pre-submission consultation processes</b>	<b>6 - 7</b>
<b>4. The Plan, meeting the basic conditions</b>	<b>8 - 47</b>
Policy wording - General	8
The Main Planning Issue – Housing provision, Policies WH01&02	8 - 22
Other issues arising in plan policies	22 - 46
<i>Policy WB01</i>	22 - 25
<i>Policy WB02</i>	25 - 26
<i>Policy WH03</i>	26 - 28
<i>Policy WH04</i>	28 - 29
<i>Policy WH05</i>	29 - 31
<i>Policy WHD01</i>	31 - 33
<i>Policy WHD02</i>	33
<i>Policy WE01</i>	33 - 35
<i>Policy WE02</i>	36 - 37
<i>Policy WE03</i>	38 - 40
<i>Policy WE04</i>	40 - 42
<i>Policy WE05</i>	42 - 43
<i>Policy WF01</i>	43 - 44
<i>Policies WF02 and WF03</i>	44
<i>New Policy WF04</i>	44 - 45
<i>Correction of errors</i>	45
Annex A. Recommendation 2 – Modification No. 1	46 - 47
<b>5. Formal Conclusion, Recommendations and consideration of Referendum area</b>	<b>48</b>
<b>Appendix 1</b> Abbreviations used in report	49

### Summary of main findings

- 0.1 It is a requirement of the Localism Act that this report should contain a summary of its main findings. The reasons for each of the recommendations are given in the following sections of the report.
- 0.2 The principal findings in this report are that the draft plan, subject to the modifications recommended in this report, meets the basic conditions as set out in the Town and Country Planning 1990 Act (as amended), does not breach and is otherwise compatible with EU obligations and is compatible with Convention Rights.
- 0.3 It is recommended that the plan, as modified, be submitted to a referendum and that the referendum area need not be extended beyond that of the neighbourhood area. My main recommendations for modifications to the individual plan sections and policies are: -
- that housing policies WH01 and WH02 be completely re-written to state the scale of development envisaged and to clarify the terms of development **being 'contiguous with the village centre' along with the criteria to be applied** in the consideration of applications;
  - that the reference to the designation of a Local Green Space in Bredwardine be removed from Policy WH01 and included in a modified form in Policy WE03 only with a clarification of the policy to be applied and the inclusion of additional text to justify such designation within the plan;
  - that the village centre at Preston-on-Wye Church (Preston Court) be deleted;
  - that Policy WB01 governing new business developments should be re-structured to split out those elements which are examples of the types of activity to be permitted rather than as policy requirements;
  - to clarify that Policy WH03 is to be applied in the consideration of applications for housing on rural exception sites;
  - that Policy WE01 should be re-written to clarify its meaning and remove repeated references to the sequential and exceptions tests from policy;
  - that specific reference to solar panel farms and small wind turbines be deleted from Policy WE04;
  - that repeated references to such matters as highways safety, car parking and residential amenity be replaced by a new policy (WF04) bringing such factors together which applies in the consideration of all development proposals.

# Wyeside NDP 2011 – 2031: Consultation Statement

---

## Section 1 - Introduction

### Appointment

1.01 I have been appointed by the Herefordshire Council (HC), acting as the Local Planning Authority (LPA), under the provisions of the Town and Country Planning Act 1990, as amended by the Localism Act 2011, to carry out an independent examination of the Wyeside Neighbourhood Plan (WNP) as submitted to the LPA on 1 February 2017. The HC carried out publicity for the proposed plan for a period of 6 weeks between 6<sup>th</sup> February and 20<sup>th</sup> March 2017 giving details of how representations might be made, in accordance with Regulation 16 of the **Neighbourhood Plans (General) Regulations 2012 ('the 2012 Regulations')**<sup>3</sup>. I was sent the documentation required under Regulation 17 on 11<sup>th</sup> May 2017 including copies of all of the representations received under Regulation 16. The examination commenced formally on 26<sup>th</sup> June 2017. I have taken that documentation and all of the representations into account in carrying out the examination.

1.02 I am a Chartered Town Planner (Member of the Royal Town Planning Institute) with over 45 years post-qualification professional experience in local and central government and latterly as a sole practitioner specialising in development plan policy work. I am independent of the **Wyeside Group Parish Council ('the Parish Council' – WGPC)** and of the Local Planning Authority. I have no land interests in any part of the plan area.

### My role as an examiner

1.03 The terms of reference for the independent examination of a Neighbourhood Development Plan are statutory. They are set out in the Localism Act 2011 and in the 2012 Regulations. As an examiner I must consider whether the **plan meets what are called 'the basic conditions'**<sup>4</sup>. In summary, these require me to consider: -

- whether, having regard to national policies and to advice contained in guidance issued by the Secretary of State, it would be appropriate to make the plan;
  - whether the making of the plan would contribute to the achievement of sustainable development;
  - whether the making of the plan would be in general conformity with the strategic policies contained in the development plan for the area;
- and to ensure that: -

---

<sup>3</sup> All subsequent reference to a Regulation followed by a number is a reference to the 2012 Regulations.

<sup>4</sup> These are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as introduced in Schedule 10 of the Localism Act 2011)

## Wyeside NDP 2011 – 2031: Consultation Statement

---

- the making of the plan would not breach, and would otherwise be compatible with EU obligations relating to Strategic Environmental and Habitats Assessment and that the plan would be compatible with Convention rights, within the meaning of the Human Rights Act 1998; and
- **that 'prescribed conditions' would be met and 'prescribed matters' would be complied with in plan preparation and submission.**

1.04 Legislation requires that my report on the draft plan should contain one of the following recommendations: -<sup>5</sup>

- a) that the draft plan is submitted to a referendum, or
- b) that modifications are made to the draft plan and the modified plan is submitted to a referendum, or
- c) that the proposal for the plan is refused.

I may make recommendations for modifications which I consider need to be made to secure that the plan meets the basic conditions or for compatibility with EU obligations and (Human Rights) Convention Rights. The only other modifications which I may recommend are those to correct errors.

### Section 2 – Statutory compliance and procedural matters

2.01 The Herefordshire Council formally designated the Wyeside Group of parishes Neighbourhood Area on 25<sup>th</sup> January 2013. The plan relates solely to the **designated area and has been submitted by the WGPC as the 'qualifying body'**.

2.02 The title of the plan is given on the front sheet as the Wyeside Neighbourhood Plan 2011-2031<sup>6</sup> with the date 2017 in large print also attributed to the Wyeside Steering Group, January 2017. That may be the case but the qualifying body is the Parish Council not the steering group. Such information will not be appropriate for the final version of the plan. The statutory requirement<sup>7</sup> **that the plan 'must specify the period for which it is to have effect', has been met.** With the exception of policy WE01.3<sup>8</sup> the plan does not include provision about **development which is 'excluded development'**. **A plan showing the area to which the Neighbourhood Plan relates has been submitted as required by Regulation 15(1)(a).**

---

<sup>5</sup> The group includes five parishes: Blakemere, Bredwardine, Moccas, Preston-on-Wye and Tyberton

<sup>6</sup> On other submission documents the title is given as the Wyeside NDP ('D' for 'Development') which is the correct generic term but I will use the shortened title used for the plan itself.

<sup>7</sup> These statutory requirements are to be found in Section 38B of the Town and Country Planning Act 1990 (as amended by the Localism Act 2011),

<sup>8</sup> See paragraph 4.82 and recommendation 10

2.03 The legislation states that the 'general rule' is that the examination of the issues by the examiner should take the form of the consideration of written representations. However, an examiner must hold a hearing 'for the purpose of receiving oral representations about an issue' where he or she considers a hearing 'is necessary to ensure adequate examination of the issue or a person has a fair chance to put a case'<sup>9</sup>. Before deciding whether a hearing would be required I issued<sup>10</sup> a list of written questions seeking clarification and further information by way of justification for plan policies. Following my consideration of the Parish Council's written responses<sup>11</sup> to those questions I felt it necessary to pose some supplementary questions specifically on the implementation of Policy WH01<sup>12</sup>. In the light of all the responses together with a few queries<sup>13</sup> addressed to the HC I was able to conclude that I had adequate information to proceed with the examination to proceed without recourse to a hearing. I will be referring to my questions and the responses to them throughout this report which is structured along similar lines.

2.06 I visited the Wyeside area on Monday 17<sup>th</sup> July 2017 (a beautifully sunny summer day). As well as obtaining a general overview of the character and appearance of the area I spent some time in each of the five villages focussing on the implications of the plan policies for possible housing development around each of the village centres identified in the plan. I also walked down from the church at Bredwardine to the River Wye bridge so that I might appreciate the nature of what is described as an 'iconic' view and the area proposed as Local Green Space.

2.07 The WGPC have submitted a Basic Conditions Statement in accordance with the Regulations<sup>14</sup>. It includes tables in which the plan is assessed in general terms against the core planning principles in paragraph 17 of the NPPF; against the three dimensions of sustainable development as set out in paragraph 7 of the NPPF and an analysis of individual NP policies in terms of their conformity with the strategic policies of the Herefordshire Local Plan (Core Strategy). It is a helpful analysis which I have taken into account although it is necessary for me to consider the implications and effectiveness of plan policies in rather more detail especially in terms of individual elements of Government policy and sustainable development criteria.

---

<sup>9</sup> Paragraph 9 of Schedule 4B to the 1990 Act (as in reference 1 above)

<sup>10</sup> On 4 July 2017

<sup>11</sup> Received on 25 July 2017

<sup>12</sup> E-mail to HC dated 2 August 2017

<sup>13</sup> E-mail response 3 July 2017

<sup>14</sup> Regulation 15(1)(d)

# Wyese NDP 2011 – 2031: Consultation Statement

---

## The Human Rights Act and EU Obligations

2.08 Section 6 of the Basic Conditions Statement includes a statement that the plan is fully compatible with the European Convention on Human Rights, as incorporated into UK law by the Human Rights Act 1998. It includes an analysis of the effects of the plan against Articles 1, 6 and 14 of the First Protocol of the Convention. The policies and proposals in the plan are not considered to have a discriminatory impact on any particular group of individuals. No representations have been made concerning this aspect and from my own assessment I have no reason to conclude other than that the approach taken in the plan is fully compatible with, and does not breach, Convention Rights.

2.09 An initial screening report under the Environmental Assessment Regulations<sup>15</sup> was prepared by Herefordshire Council in May 2013 and consulted upon. The screening opinion was that, owing to the range of environmental designations in an around the plan area, there may be significant environmental effects and that a Strategic Environmental Assessment (SEA) would be required. A scoping report was produced in March 2015 upon which no comments were received from the statutory consultees.

2.10 An initial Environmental Report was prepared in April 2016 prior to the Regulation 14 consultation on the draft plan. It included appendices detailing the environmental effects of the plan objectives, policies, proposals against SEA objectives and identifies alternatives. A revised version was produced in January 2017 taking account of amendments made to 4 policies as the result of that consultation process. Its conclusions are that for the most part many of the policies score positively against environmental objectives or have a neutral effect. I am satisfied that the SEA work fully meets the requirements of the EU Obligations<sup>16</sup>.

2.11 The initial screening report also includes a section on the requirements of the Habitats Regulations.<sup>17</sup> Three of the parishes within the Wyese group border the River Wye (including the River Lugg) Special Area of Conservation (SAC), a European site. The conclusion, in paragraph 8.6 of the screening report, is that the neighbourhood plan will not have a likely significant effect on the European site. No responses were received to the statutory consultation. In view of that **conclusion an 'appropriate assessment' under the Regulations was not undertaken.**

---

<sup>15</sup> The Environmental Assessment of Plans and Programmes Regulations 2004

<sup>16</sup> European Directive 2001/42/EC

<sup>17</sup> The Conservation of Habitats and Species Regulations 2010, Regulation 102



## Wyese NDP 2011 – 2031: Consultation Statement

---

An addendum report was issued in January 2017 relating to the amended submission version of the plan reaching the same conclusion.

2.12 From the above, I am satisfied that the submitted plan is compatible with EU environmental obligations and meets the basic condition prescribed by section 1 of Schedule 2 to the Habitats Regulations.

Section 3 - Preparation of the plan and the pre-submission consultation processes

3.01 As required by legislation<sup>18</sup>, the WGPC have submitted a Consultation Statement. It sets out details of the public engagement undertaken, meetings and open days summarising the responses received and action taken. In addition a questionnaire was circulated to all households the results of which are set out in Addendum 1 to the Consultation Statement<sup>19</sup>. The initial public consultation processes were clearly very thorough and led to a good deal of consensus within the community about the contents of the plan.

3.02 The Consultation Statement sets out the responses to the Regulation 14 consultation identifying the main issues arising and how the representations were addressed in preparing the plan for submission to the local planning authority for examination. Unfortunately there is an omission in that the statement does not **include a list of the 'persons and bodies consulted' (the statutory consultees) or** details as to how they were consulted.<sup>20</sup> However, this information was supplied<sup>21</sup> upon my request and I am satisfied that that aspect of the consultation process was undertaken effectively.

3.03 I am satisfied that every effort has been taken to publicise the plan and to involve the community in its preparation. In particular, it is notable that no representations were made at the Regulation 16 consultation stage by individual members of the public. Presumably that is an indication of general satisfaction within the community with the plan as a whole.

3.04 I feel that I must, however, comment on the implications of the WGPC decision to produce a criterion based plan rather than to make specific site allocations, particularly for housing. There is, of course, no requirement that neighbourhood plans should make allocations but that places greater emphasis on the wording of the policies which will be used by the local planning authority as a basis for decision-making when planning applications are made. That is one reason

---

<sup>18</sup> The Neighbourhood Planning (General) Regulations 2012, Regulations 15(1)(b) and 15(2)

<sup>19</sup> This addendum was not submitted with the initial material and was obtained upon e-mail request.

<sup>20</sup> As required by Regulation 15

<sup>21</sup> E-mail from Herefordshire Council 26 July 2017

why the implementation of Policies WH01-02 is a main issue for my deliberation in the following section.

3.05 In an introductory section of their responses to my initial questions, under **the heading 'Adoption of a Criteria Based Plan', the WGPC have stated that following** the referendum on the plan, provided it is successful, the Parish Council intend to become more active in consultation with landowners, developers and residents regarding the identification of specific sites for development. A similar point is made in response to my question 12c. There is also mention of other work to identify the need for affordable homes and on housing mix and dwelling sizes. From this it appears to be the intention of the WGPC to undertake this work outside of the neighbourhood plan process and yet it should be a fundamental part of it. There is nothing in the plan about any monitoring or review processes. No plan should be **seen as a 'one-off'**.

3.06 It is not within my remit to make a formal recommendation on the need for an early plan review but everything the WGPC have stated in their written submission indicates that this plan is, in effect, work in progress. If, through discussions with landowners and developers, specific sites for housing development are identified then community consultation on those sites should be in the context of proposed alterations to the neighbourhood plan. The revised plan would also need to be considered for Strategic Environmental Assessment.

### Section 4 - The Plan, meeting the basic conditions

4.01 This section of my report sets out my conclusions on the extent to which the submitted plan meets those basic conditions which are set out in the first three bullet points in paragraph 1.03 above. If I conclude that the inclusion of a policy in the plan means that, as submitted, it does not meet one or more of the basic conditions, I recommend a modification to the plan policy in order to ensure that the plan, taken as a whole, does meet those conditions.

#### Policy wording - General

4.02 I see that there is an extract from the Planning Practice Guidance<sup>22</sup> under the heading Definition of Policy at the top of page 8 in the plan. I referred to it by way of comment in the introductory section to my questions for clarification sent to the WGPC. **This states: 'A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications.'**

---

<sup>22</sup> Reference ID: 41-041-20140306

The same extract also states that a policy should be concise, precise and supported by appropriate evidence. These are important principles which underlie my consideration in the following paragraphs of individual policies against the basic conditions. Cross-references between policies are unnecessary because the plan has to be read as a whole. It also means that planning policy statements, in the coloured boxes, should not include explanatory comments or notes to justify the policy. These are often included in brackets within the policy boxes but they should be separated out and moved to the plan text. I make a general recommendation to that effect before moving on to the main issue.

### Recommendation 1

Remove all explanatory statements from within the coloured policy boxes and include such statements within the accompanying explanatory text for the relevant policy. Also delete cross-references between policies.

### Main planning issue – housing provision and delivery – Policies WH01 and WH02

4.03 The main planning issue for this examination arises in part from representations made on the plan by the Herefordshire Council. These have come from both the strategic planning and development management teams. The main issue is whether the plan, particularly in meeting with the provisions of WNP Policies WH01 and WH02, is likely to deliver the amount of housing required under the strategic policies of the adopted Herefordshire Local Plan (Core Strategy) (HCS) in a manner which has regard to Government policy and guidance and which would contribute to sustainable development.

4.04 The HCS was adopted in October 2015 and so is a relatively recent planning document. As such it may reasonably be expected to accord with Government policy and guidance in the shape of the National Planning Policy Framework (the NPPF) and the accompanying Planning Practice Guidance (PPG). It is evident from the Basic Conditions Statement submitted with the plan by the WGPC that attention has been paid to these documents when compiling the WNP.

4.05 The HCS strategy for the development of rural areas is to improve sustainability by providing for positive growth through the development of appropriate rural businesses and housing<sup>23</sup>. The evidence base for housing provision in the HCS identifies needs at the level of Housing Market Areas (HMAs)<sup>24</sup>. The minimum housing provision for the rural areas of 5300 dwellings

---

<sup>23</sup> HCS, paras. 4.81-3

<sup>24</sup> GL Hearn Local Housing Requirements Update September 2014

## Wyeseide NDP 2011 – 2031: Consultation Statement

---

2011-31 under HCS Policy RA1 is apportioned between the HMAs in accordance with the table thereunder with 304 dwellings to be provided within the Golden Valley HMA within which Wyeseide is located. That represents a growth of 12% against the base (2011) housing stock over the plan period. As indicated in paragraph 4.3 of the WNP the proportionate requirement<sup>25</sup> for Wyeseide is 39 dwellings of which 6 were committed in 2014. I am informed<sup>26</sup> that the position as at 1 April 2017 was that 3 of the 6 dwellings had been completed with 3 **outstanding permissions. The table will require updating. The 'residual' requirement 2011-2031 remains as 33 dwellings.**

4.06 There is strong emphasis in Government policy on ensuring that housing proposals in plans are deliverable. In the PPG<sup>27</sup> it is stated that if the policies and proposals are to be implemented as the community intend a neighbourhood plan needs to be deliverable. Sites are not allocated in the WNP for housing development nor does the plan set any target for the totality of housing provision although the total numbers deemed to be acceptable in each village are given in paragraph 4.4 derived from questionnaire survey. The figures in that paragraph **total 38 which would, as stated, 'reasonably support' the HCS requirement if that number of houses is actually built.**

4.07 The strategic planning team of the Herefordshire Council have made formal representation questioning the deliverability of sites contiguous with the village centres. However, it is necessarily the case that a criterion-based policy does not provide the same degree of certainty about delivery as would site allocations made after discussion with landowners and developers about their intentions, at least for the first five years of the plan period. In paragraph 5.4 of **the Consultation Statement it is stated that 'careful on-site analysis has confirmed that the criteria-based approach ... offers significantly more development options than is required to meet growth requirements.'** That analysis work has been made available as part of this examination at my request because I wished to satisfy myself in the light of the HC comments that there would be a reasonable prospect of sufficient land being brought forward to meet the HCS requirements.

4.08 Although the WGPC see under-provision as more of a problem than over-provision from the plans provided I concur with the conclusion that the potential development options could, indeed, significantly exceed the proportionate HCS

---

<sup>25</sup> Derived from HC Rural Housing Background Paper, March 2013, para. 5.26

<sup>26</sup> E-mails from HC, 3 July 2017

<sup>27</sup> Ref. ID 41-005-20140306

provision for this area. Neighbourhood Plans may promote more development than the local plan but there is no indication in the WNP of such intention. Furthermore, the absence of any indication in policy of the overall quantum of housing within each village would make it difficult for the LPA to refuse applications for development which meet the policy criteria even if the amount of new housing development indicated in paragraph 4.4 had already taken place. The HCS figure is a minimum<sup>28</sup> but the quantum is reflective of a strategy which places emphasis on support for the sustainability of the rural area. A level of development unrelated to the services and facilities needed in support would not contribute to sustainable development which is one of the basic conditions for neighbourhood plans.

4.09 National policy, as stated in paragraph 55 of the NPPF encourages a more flexible approach to development in groups of smaller settlements assuming a functional relationship between the settlements in a group to maintain or enhance sustainability. In that respect, the Wyeside group does not function in isolation from those larger settlements within the Golden Valley HMA which have a higher order of service provision, including a primary school. The level of housing development envisaged by the WNP is in line with the proportionate approach advocated in the HCS. Significantly greater amounts of housing development would not be in general conformity with the HCS. For those reasons, I consider that a figure for the overall provision of housing within the plan area should be stated within Policy WH01, albeit in approximate terms to provide a degree of flexibility.

4.10 Any criterion which gives a target for the number of houses to be completed over the plan period should be as up to date as possible when the plan is made. It should, therefore, relate to the residual figure as discussed in paragraph 4.05 above specifying the distribution between the villages given in WNP paragraph 4.4. However, as explained in that paragraph it is a priority to provide developments in Bredwardine and Preston-on-Wye of a sufficient size to secure an element of affordable housing. No local housing needs survey has been undertaken for Wyeside. Instead, reliance is placed on the questionnaire circulated at parish level and comments made at an open day for young farmers showing some variation from the GL Hearn study at HMA level which, as discussed in paragraph 4.58 below, suggests a need for the provision of affordable housing for young families. Under Government policy and HCS Policy H1 the minimum site size threshold to

---

<sup>28</sup> As explained in the HCS para. 4.8.21

achieve an element of affordable housing on a mixed site is 'more than 10' (i.e. 11 or more) not '10 or more', subject to floor space considerations. That is a simple error of interpretation. Commitments and completions<sup>29</sup> in Bredwardine and Preston-on-Wye will, therefore, be over and above that requirement. The only completion outside those two larger villages has been the one in Tyberton.

4.11 Government policy on neighbourhood plans is that communities should be able to shape the nature and type of development in their area<sup>30</sup>. In that regard it is not unusual for indications to be given in plans about the optimum size of development schemes which would respect the character of any particular village. As indicated in paragraph 4.5 of the WNP, the Wyeside communities through the questionnaire returns, as detailed in Appendix 4, have expressed opinions on the acceptable size of development in each place although it is stated in the text that **the numbers are provided 'as a guide only'**. This brings in to question<sup>31</sup> the purpose of including the fourth bullet point in the policy which gives the numbers as a 'preferred maximum'.

4.12 It is made clear in the Planning Practice Guidance that policies in neighbourhood plans are implemented through decisions on planning applications, mostly by the LPA but it can be by an Inspector on appeal or even the Secretary of State in some instances. There is no place within policy, as shown in this plan by coloured boxes, for anything intended as guidance. Explanatory notes should not be included within the policy box either. That is a function of the plan text by way of justification for a particular policy choice. Guidance and community preferences do not have the status of statutory policy<sup>32</sup> and, for clarity, should be distinct. The size of development sites is clearly a land-use matter which would be capable of inclusion in statutory policy, but because it would pose a constraint on development there would need to be robust and proportionate evidence to support it. An expression of opinion does not constitute evidence. However, the parish has chosen not to specify site size in the policy but to give an indication of community preference. That is an aspirational statement.

4.13 However, as discussed in paragraph 4.10 above, an interpretation of paragraphs 4.4 and 4.5 in the plan text together with the 'preference' for larger housing developments in Bredwardine and Preston-on-Wye means that only one development of a minimum of 11 dwellings is envisaged in each of those villages,

---

<sup>29</sup> Completions: Bredwardine 2, Preston 1; Commitments: Bredwardine 2 (Tyberton 1)

<sup>30</sup> NPPF, paragraphs 185-6

<sup>31</sup> My question 14

<sup>32</sup> Meaning statutory development plan policy for the purpose of applying s38(6) of the 1990 Act

although there may be alternative sites for such provision. The wording in brackets within the fourth bullet point of Policy WH01, although really an explanation of the larger site size, indicates it is more than just a preference. It is a distinct policy requirement which is repeated in the second bullet point of Policy WH02 – **‘where sites of ten or more dwellings are supported’**. For clarity, the fourth bullet point in Policy WH01 should be replaced, linked to a statement of the overall quantum of housing development in the plan area<sup>33</sup>, by a policy criterion stating specifically that housing development of sites for 11 or more dwellings will be permitted in Bredwardine and Preston-on-Wye. That would then complement and provide greater detail than HCS Policies RA1 and RA2. The Development Management team are, however, correct to point out that the policy cannot require a development to be for more than ten dwellings.

4.14 That leaves the preferences for the amount and size of development in Moccas, Blakemere and Tyberton as indicated in paragraphs 4.4 and 4.5. Those are aspirations, no more no less, and should not be stated in policy. A complication has also been introduced by the last WGPC response to me in which they indicate that there is a lack of interest in development from landowners in **both Tyberton and Blakemere ‘although an occasional development plot and some re-use of farm buildings may occur in the longer term.’** That casts considerable doubt on the community aspirations for those two smaller villages although it would seem that various development options have been discussed with landowners at Moccas. On reviewing all of the material which has been presented to me I am satisfied that there is a reasonable prospect that the residual HCS housing requirement might be met by the two large developments in Bredwardine and Preston-on-Wye (11 each) plus the preference for 8 in Moccas. The total of 30 takes no account of potential conversions of existing buildings for residential use. The extant permissions and recent completions demonstrate the potential for that source of supply. It means that, given the uncertainties, there would be no mention in the plan of possible housing provision in either Blakemere or Tyberton. I deal with the implications for the identification of village centres below. WNP paragraph 4.5 may remain unaltered allowing a decision-maker to take it into account as a material consideration.

4.15 In order to ensure the delivery of the housing envisaged by the HCS the criteria in Policy WH01, as well as WH02 which is closely associated with it, need to

---

<sup>33</sup> See paragraph 4.09



## Wyeside NDP 2011 – 2031: Consultation Statement

---

reflect the positive approach to planning sought by Government<sup>34</sup>. The criteria included within the policies should not, either individually or in aggregate, present such a list of requirements that they pose undue constraints on development. That is especially so given the statement that all criteria need to be satisfied before an application for housing development is approved. I examine the remaining criteria within the two policies in that light.

4.16 *Relationship between policies WH01 and WH02.* As I pointed out in my questions there is an overlap between these two policies. The first bullet point in Policy WH02 overlaps with the sixth in Policy WH01 and the second bullet point in Policy WH02 with the fourth and thirteenth bullet points in Policy WH01. In response the WGPC suggest the deletion of the sixth and thirteenth bullet points in Policy WH01 and some amendments to the wording in Policy WH02. I agree that for the sake of clarity the overlap between the two policies should be avoided. Policy WH01 should be the main policy to determine the overall quantum and location of housing development with Policy WH02 dealing with dwelling type and size. I recommend a composite modification (No. 1) to both policies WH01 and WH02 as set out in Annex A to this report.

4.17 *Policy WH01. First bullet point.* In response to my question (no. 10) about the intentions behind this criterion, which arose from a representation by the HC DM section the WGPC have stated that it 'is meant to refer to a consultation process with the local community prior to submission of a plan for approval'. By that I assume a 'plan' means a proposal for development, i.e. pre-application. But that rather misses the point. It is the neighbourhood plan process itself which provides an opportunity for the local community to be involved in the selection of sites and Housing Objective 1 should have been delivered as part of that<sup>35</sup>. As that has not been done it is clearly desirable that the community should be given an opportunity to comment as at early a stage as possible in the formulation of any proposal but it cannot be made a requirement that an applicant should 'demonstrate community support' as a pre-condition for permission to be granted, which is the way Policy WH01 is phrased. Consultation processes are procedural matters properly dealt with in Herefordshire Council's Statement of Community Involvement (SCI). SCI paragraph 10.16 strongly encourages pre-application community consultation for 'significant development', which includes proposals for 10 or more houses, but it does not, and could not, require it.

---

<sup>34</sup> NPPF paragraph 16.

<sup>35</sup> See also my comments on the possible need for plan review if sites for development are identified.

4.18 How consultation is undertaken is an entirely procedural matter, not a land-use one. The PPG advice is that non land-use matters can be included in a neighbourhood plan but should be clearly distinguishable from statutory policy, for **example in an annex. As a community aspiration, the WGPC's desire that any proposal should receive community support could be included in such an annex which could cover the Parish Council's own procedures for community consultation** when an application is received. The fact that the community did not support a particular proposal and the reasons for that lack of support, or opposition, would undoubtedly be a material consideration for the LPA which might well influence the eventual decision but there would have to be sound planning reasons for any refusal.

4.19 For the above reasons I recommend deletion of the first bullet point from the policy for the plan to meet the basic condition of having regard to Government policy and guidance. There is no basis for me to recommend how the WGPC might then involve the local community in discussions with landowners and developers to promote development within the parameters set by the neighbourhood plan policy criteria. It will be a matter entirely for the Parish Council to decide how best to publicise their intended approach to public involvement in any such negotiations.

4.20 *Policy WH01. Second bullet point.* This policy provision is one of the most important in the whole plan. I regard it as so central to the implementation of the plan that, for clarity, it should not be treated as a criterion on an equal basis with the others but as the main tenet of the policy which is stated at the outset. The other criteria would then represent factors to be taken into account in deciding whether housing development on sites which are contiguous with the village centre(s) were acceptable. It is crucial in that respect that the meaning of the words used are precise and clearly understandable for the decision-maker.

4.21 The WGPC have chosen not to use the conventional approach of identifying settlement boundaries drawn on a Policies Map to define the edge of the main built-up part of the villages. Unfortunately words are always more open to interpretation and argument as to their meaning than lines on maps. Lines represent certainty both for the decision-maker and the landowner. They also provide an opportunity for representation on a plan that a line should be drawn in a different place to that chosen by those drawing up the plan.

4.22 In response to my initial questions the WGPC suggested that they might produce a supplementary document expanding upon the circumstances in which an area of land (by **its very nature an area of land must always be 'spatial'**) is

considered to be *contiguous with the village centre*. However, the meaning of the terms in a plan must be clear from the plan itself.

4.23 **The WGPC's responses to my questions, including my supplementary request for clarification, confirms the concept of the 'village centre' is broader than** that of the red circle shown on the Policies Maps around a village facility (community hall, pub, church) but includes any existing development which is itself **'contiguous with' (that is adjacent to, neighbouring or abutting) that centre, as** indicated in the wording at the foot of page 23 of the plan under Figure 7. The WGPC have accepted a revised wording for the policy which I recommend within Modification No. 1 with a slight variation.

4.24 **The variation is to include the word 'existing' to qualify the word 'centre'.** That is because without such qualification there would be the potential for the outward extension of ribbon development along roads leading away from the village centre which would not contribute to sustainable development. Using as an example the excellent diagrams within Figure 7, the existing centre is shown by green squares in Phase I but the new houses abutting the centre shown as yellow **are shown as green at Phase II with some additional 'acceptable' houses in yellow.** Where those additional yellow boxes represent infill there would be no difficulty but where they are on the outer edge of the settlement there would be the potential for a further **'yellow' plot further out at the next 'phase' *ad infinitum*.** Cumulatively, such ribbon development could have a significant effect on the character of the village especially as, for individual dwellings, it could take as little as a year to 18 months **to complete a 'phase'.**

4.25 I also questioned the appropriateness of new housing development in all instances contiguous with the centres shown on the Policies Maps. The WGPC have responded indicating that the identification of a centre at Preston-on-Wye Church (Preston Court) is of an historical nature there being little potential there owing to fluvial flooding. This leads me to conclude that the identification of Preston Church as a village centre when applying Policy WH01 to it would not contribute to sustainable development and it should not be so identified for that reason. The position of the centres at Blakemere and Tyberton is less clear cut. The potential for housing development there may be minimal but they are listed in Figure 4.15 of the HCS as smaller settlements to which HCS Policy RA2 applies. If they were to be deleted as centres the HCS policy would continue to apply but it might be more difficult to deliver on the community aspirations for those villages should opportunities arise. On balance, I consider that the application of the criteria in Policy WH01, subject to the recommended modification discussed above, will not

contravene any of the objectives behind the basic conditions for neighbourhood planning. They should remain as centres.

4.26 Moccas also has two centres identified by red circles on the Policies Map. The northern group is centred around the village hall but the identification of the war memorial at the crossroads between Woodbury Lane and the B4352 as a village centre does not easily fit the criteria for the identification of such centres. The only existing development which might be described as being contiguous with such a centre is the ribbon of housing along the southern side of the B4352 westwards from the cross. The WGPC have clarified that the intention would be to provide for a more coherent settlement pattern consolidating the small group of older houses further down Woodbury Lane.

4.27 **This drew to my attention the omission of the qualifying words 'where land on the opposite side of the road from a building designated as the centre of a village is a green space (no houses having been built in that location) no housing development will be allowed in that area.'** which had been included in Policy WH01 in the Regulation 14 draft. Without such a qualification the three fields to the NW, NE and SE of Moccas Cross would be candidates for development being contiguous with that centre. I am in little doubt that development of that nature in this location would not contribute to sustainable development and would be unlikely to be regarded favourably in terms of general conformity with the HCS. The WGPC have confirmed that this omission was an unintended consequence of a revision specifically relating to land opposite the Red Lion in Bredwardine. Even though there has since been written confirmation by representatives of the Moccas Estate that development of the fields in question is not envisaged I consider that a modification to the policy to include the qualifying words remains necessary to ensure that the objectives of the plan are achieved.

4.28 *Policy WH01. Third bullet point.* In my questions I drew attention to the overlap between this bullet point and Policy WE03 and the fact that it does not read as a criterion but as an individual policy constraint. The WGPC have agreed that the plan would have greater clarity if this bullet point was to be deleted and the issue of the protection of green spaces dealt with only in Policy WE03. I agree and consider the merits of a revised Policy WE03 in paragraphs 4.89 to 4.96 below, specifically on the designation of a Local Green Space.

4.29 *Policy WH01. Fifth bullet point.* My main concern with regard to the **inclusion of a reference within policy to the 'RIBA 2016 Best Practice on Village Design'** is the degree of specification and the fact that there has been no discussion with landowners or developers about the acceptability of this particular model of

village development. It would be important to establish, for any particular site, whether it would be feasible or practicable to achieve this particular layout and access arrangement bearing in mind marketability and hence viability factors. There is also no evidential basis to justify applying the model to developments as small as three dwellings when providing access at to more than one road, as shown on the diagram, may not be a viable proposition. As currently worded, the policy could preclude otherwise desirable development contrary to Government policy.

4.30 The intentions behind the policy to achieve development which is in character and well connected to the existing village are laudable ones but if the main purpose is to avoid dead-end culs-de-sac then that should be explicitly stated together with a wording which provides greater flexibility. It is neither appropriate nor necessary to name the RIBA model within policy as its status is unclear<sup>36</sup> and such specific reference introduces potential obsolescence to the plan should the source document be modified, revised or withdrawn. I recommend a revised criterion which encompasses the principles sought but with some flexibility and less prescription.

4.31 *Policy WH01. Seventh bullet point.* The main part of the policy, to replace the second bullet point, is recommended for modification to cover infilling within the existing centre(s). Also, relating to the existing built form is a similar consideration to the effect of development on the character of the area. The criteria are recommended to be merged for simplicity and clarity.

4.32 *Policy WH01. Ninth bullet point.* I understand that this criterion, to **encourage 'active travel', was introduced as the result of a suggestion by the** Herefordshire Council even though it adds nothing to the third criterion in HCS Policy MT1. Furthermore, it is not at all clear what provisions it is intended should be made and how it would be achieved. There is no justification in the plan for the criterion and no evidence to support it. The inclusion of such a requirement without supporting evidence is contrary to Planning Practice Guidance<sup>37</sup>.

4.33 *Policy WH01. Tenth bullet point.* The WGPC have accepted that in the interests of clarity repetitive criteria covering such matters as the effect on residential amenity along with highways considerations should be replaced by a new policy (WF04) covering all such factors. It is also agreed that cross-references between policies are unnecessary because the plan has to be read as a whole, as

---

<sup>36</sup> It does not appear to be an RIBA policy document and is not referenced in any planning practice guidance.

<sup>37</sup> Ref ID 41-040-20160211

recognised in the final sentence of paragraph 1.2 in the plan. This will be covered by a general recommendation at the end of this report.

**4.34 More specifically, the requirement that there should be 'no adverse impact on future residential occupants from existing development'** would be impossible to implement because conditions or restrictions could not be imposed retrospectively on any existing development unless, for example, a use was taking place in contravention of environmental conditions. On the related point raised by the Environmental Health Officer, I consider that Housing Objective 7 is wide enough in its scope. It is the location of noise-sensitive development relative to existing uses which may cause disturbance which is the relevant planning consideration.

*4.35 Policy WH01. Twelfth bullet point.* The national priority given to the use of brownfield sites for housing is put into effect primarily through the choice of sites for housing when options present themselves for site allocations through the development plan process. The WGPC have acknowledged that there are presently no known brownfield sites within Wyeside. This policy is worded as a development management policy with criteria needing to be satisfied before planning permission is granted. An applicant cannot **'give priority' to the development of a brownfield site** which is not in their ownership. This criterion could, potentially, result in the refusal of a proposal meeting the other criteria in the policy which would otherwise be sustainable development. It represents a potentially harmful constraint on development contrary to national policy and should be deleted to satisfy the basic conditions.

*4.36 Policy WH02.* As indicated in the preceding paragraphs, for clarity in the plan, as the title suggests, this policy should deal with housing mix; tenures, types and sizes. The WGPC have suggested that the sixth bullet point in Policy WH01 should be deleted and merged with the first criterion in Policy WH02. In the submitted plan this criterion provides **only general encouragement for 'an appropriate mix' of tenures, types and sizes 'that reflect the needs of Wyeside'**. On the other hand, the sixth bullet point in Policy WH01 is more prescriptive and **specifies that the mix should be of 'predominantly two and three bedroom properties' but may be one bedroom 'where a local need has been identified' or 'larger homes where a market has been identified'**.

*4.37* In practice, both of these policy criteria are so broadly phrased that they give no real guidance to a plan user on what is required, nor for that matter would they assist a decision-maker in assessing whether a particular proposal met with plan requirements. More significantly, this is an example of where any policy stipulation, because it would potentially intervene in the judgment of the market as



to the type of housing which would sell, should have had regard to the practice guidance advice that any choices, in this case of house sizes, should be based on **'proportionate, robust evidence'**.

4.38 The statistical analysis in Figure 8, paragraph 4.8 of the plan represents robust evidence for existing dwelling sizes. It shows that there is a significantly smaller proportion of small (one and two bedroom) properties and a higher proportion of larger (three and four bedroom) houses in Wyeseide than in the Golden Valley HMA as a whole. However, it is not clear what conclusion can be drawn from that about future needs.

4.39 I accept the comment made by the WGPC that the GL Hearn study, from which statistics about future needs have been extracted<sup>38</sup> and quoted at the start of paragraph 4.8 in the plan, relates to the HMA as a whole and makes assumptions that may not be applicable in Wyeseide. However it should be noted that the figures in paragraph 4.8 apply only to open market housing, not to affordable housing. If Policy WH02 is intended to apply to all new housing then it must also include affordable housing for which GL Hearn identify a significantly different profile of need by dwelling size with a markedly larger proportion of smaller dwellings, especially one-bedroomed<sup>39</sup>.

4.40 In effect, the WGPC challenge the conclusions of the GL Hearn study and **prefer information gathered 'on the ground' in Wyeseide. They have expanded upon** their criticism in their written responses. I do not accept that the GL Hearn study is erroneous. It is soundly based on a study of demographic trends at County level working down to the HMAs. It is not designed for direct translation down to smaller areas although there is some mention of differences between the northern and southern wards of the Golden Valley HMA. As the balance within the existing stock varies by smaller area so will any needs analysis. In the local questionnaire, question H4 does not ask the respondent to indicate what their household requirements might be in the future. It seeks an opinion as to what sizes of dwelling there should be within the plan area. It does not ask about need or demand nor does it identify whether the respondent is likely to want to move from their existing accommodation. That is neither robust nor proportionate evidence of the kind required to specify any particular house size by way of policy. There is no specific identification in Appendix 1 of the Consultation Statement of the responses made at the Young Farmers Club (YFC) in August 2014 nor is there any reference

---

<sup>38</sup> Herefordshire Local Housing Market Assessment – 2012 Update, paragraph 13.49, Figure 65.

<sup>39</sup> As above, paragraph 13.51, Figure 66.



to verification interviews. I have been supplied with more information about the questions put to the YFC and it is understandable that there will have been emphasis by that group on the need for accommodation large enough to accommodate families.

4.41 There would also be practical difficulties in the implementation of a policy which would permit larger, presumably 4 bedrooms and more, houses where a market had been identified. It might well be that it is seen to be desirable to attract families into the area but as the policy is drafted it would enable any developer who identified a market for larger houses to provide only for that market.

4.42 In summary on this matter, the evidence does not support a policy which specifies any particular range of house sizes other than a general provision that **there should be 'predominantly two and three bedroomed properties' and then only** within market housing, not affordable. There is no local analysis of any dwelling **size requirements within the affordable housing sector. A requirement to 'reflect the needs of Wyese' would be meaningless unless that need was** clearly identified and supported by evidence. The numbers involved are small. It is to be noted that HCS Policy H3 applies only to developments of 50 houses or more. I recommend, within Modification No. 1, the deletion of the sixth bullet point in Policy WH01 and the inclusion of an abbreviated requirement in the first criterion of Policy WH02.

4.43 I turn now to the second part of Policy WH02 which is linked to the requirement in the fourth bullet point of Policy WH01 for the provision of larger (11+ dwellings) housing developments in Bredwardine and Preston-on-Wye to secure a proportion of affordable housing. There is a degree of repetition of the first bullet point requiring an unspecified mix of tenures, (house) types and sizes. The main thrust appears to be that there should be some affordable housing within the mix on the larger sites and that these should be integrated across the site. I also consider that the final bullet point in Policy WH03 is out-of-place in that policy **which, it has been clarified, should apply to 'exception sites', as discussed in** paragraphs 4.54-62 below. In order to provide a clear policy context, the treatment of affordable housing on mixed sites is more appropriately covered within Policy WH02.

### Recommendation 2

Delete Policies WH01 and WH02 and replace them by new policies as set out in Modification No. 1 in Annex A to this report.

### Other issues arising in plan policies

4.44 In this part of my report I deal with the remainder of the plan policies primarily seeking to ensure that sufficient regard is had to Planning Practice Guidance on the need for policies to be clear and unambiguously worded so as to provide a context for decisions on planning applications. This is done in plan order, starting with the employment (WB) policies in section 3. Where a policy is not mentioned it means that I am satisfied that the plan meets the basic conditions with the inclusion of that policy

4.45 *Policy WB01 – New Business Opportunities.* The WGPC have accepted that the first six bullet points under this policy are not, in themselves, policy requirements. They are examples of the types of employment uses which are seen as diversifying the local economy but it is not clear how they relate to the list of the types of employment to be encouraged in paragraph 3.6. That makes the plan unclear. It is likely that any new employment would be regarded as a local benefit unless it resulted in demonstrable harm. Full regard must be had to paragraph 28 in the NPPF.

4.46 I notice that the policy is very closely modelled on HCS Policy RA6 with only subtle differences, presumably examples which do not apply locally. The purpose of a neighbourhood plan policy should be to provide greater detail than the local plan, applying it to the particular local circumstances. It seems to me that it is paragraph 3.6 in the text which does that and it is that list which might most usefully be included at the start of the NP policy using a similar form of words to that of the HCS policy. Examples might be given of what would constitute sustainable tourism but the reference to the Employment Land Study should be omitted because it is part of the CS evidence base, not policy. The cross-reference to HCS Policy E4 might also be omitted. Paragraph 3.6 itself should provide explanation and justification for the choice of the employment activities which it is considered would help diversify the local economy. Obviously, the list is not exhaustive and that needs to be clear from the wording.

4.47 The seventh bullet point is out-of-place and does not reflect national policy for business (B class) development. The effect on the vitality and viability of a nearby centre is a policy consideration for retail development and is, therefore, more properly included within Policy WB02.

4.48 The effect of development on residential amenities and on the safety of the local road network and parking are common considerations applicable in many different situations. The WGPC have accepted that the plan should be read as a

whole and that its clarity would be improved by the addition of an over-arching policy dealing with such factors. They suggest it be numbered WF04. I recommend this towards the end of this report (Recommendation 16). It obviates the need for similar criteria to be included in many policies, including this one. Also, as indicated in paragraph 4.02 there is no need for cross-references between policies and, for clarity, I have recommended their removal.

4.49 The meaning of the final bullet point in this policy is far from clear. It appears to suggest that if the proposal involves the development of a brownfield site other policy criteria would not apply. The WGPC suggest a generalised **statement that development must comply with 'relevant building design and/or change of use, environmental and facilities and services policies set out in this plan.'** **Such a statement is unnecessary because, as the WGPC have themselves acknowledged, all relevant plan policies will apply in any event.**

4.50 I am informed that there are no identified brownfield sites within the plan area. Even if some arise in the future they would not be exempt from other policy considerations. The WGPC do not suggest in response to my question 6a. any particular reason why any brownfield site should be treated differently to green field, for example in terms of offering employment to local people. There is no justification for any differentiation and those references should be deleted for that **reason. The use of the word 'must' is unduly prescriptive and potentially restrictive rather than being positive and permissive. It needs to be replaced by 'should' to properly reflect Government policy. The CPRE's concern about the impact of large-scale industrial farming is covered by the last bullet point.**

4.51 It is not stated how it is intended to ensure that any new business should offer employment either to existing residents or to any new residents re-locating to the area, presumably such as key workers moving with a new employer. One possibility might be to use a planning obligation under s106 of the Planning Act but any such obligation must meet the requirements of paragraph 204 in the NPPF. Any obligation, or planning condition, can only be used if it is necessary to make the development acceptable; in other words, without it permission would be refused. Government policy as expressed in paragraph 28 of the NPPF is that planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. There is no suggestion that to be sustainable those jobs should only be available for local people or people moving in to take up such jobs. I very much doubt that permission would be refused in the absence of any such obligation. Sufficient

regard has not been had to the need for a positive approach to employment provision. That criterion should be deleted for that reason.

### Recommendation 3

Delete the introduction to Policy WB01 and all but the final bullet point and replace it by the following: -

Employment generating proposals which help to diversify the economy of Wyeseide will be permitted where they are of a scale which is commensurate with the location and setting. A range of economic activities will be supported, including: -

- local food and drink production and agricultural diversification;
- commercial facilities such as village shops, garden centres and public houses;
- high value knowledge based employment such as financial, technical and professional services;
- the small-scale expansion or extension of existing businesses;
- light industry and/or manufacturing; trades and crafts;
- transport, storage and distribution;
- health and social care;
- sustainable tourism including bed and breakfast/ holiday accommodation; restaurants and cafes; leisure-related community facilities.

In the final **bullet point delete the introductory sentence 'That the proposal is...must:' and replace it by 'All proposals should:'**. **Delete the first requirement 'Provide employment for the local community;'**

Re-draft paragraph 3.6 to provide an explanation and justification for the choice of types of employment which are listed in the policy as helping to diversify the local economy.

4.52 *Policy WB02 – Retail Development*. As indicated in paragraph 4.47 the **'test' that development should not be of such a scale that it threatens the vitality and viability of a nearby centre is a long-standing aspect of national policy governing the consideration of proposals for new retail development<sup>40</sup>**. Given the **nature of the area the term 'centre' might apply to only one shop**. On being asked what the definition of a small retail development might be the WGPC have responded by relating it to the footfall experienced 'in one or more of the larger

---

<sup>40</sup> Now incorporated within paragraph 23 of the NPPF

villages'. It would be difficult for any decision-maker to judge what that might actually mean.

4.53 I am also informed that there is no requirement for an A1 retail development and it would seem unlikely given the small population within the plan area that any proposal would be forthcoming. It is, therefore, difficult to understand what the policy is intended to achieve. Nevertheless, I am sure that if any such proposal was made it would be a welcome facility for the community. The only relevant planning consideration, subject to the general amenity and traffic/parking factors, would be the vitality-**viability 'test' as mentioned above.** To have full regard to national guidance that is all that the policy might reasonably state and I recommend accordingly.

#### Recommendation 4

Modify Policy WB02 to read:-

Proposals for retail development will be permitted provided that it is of a scale which would not threaten the vitality and/or viability of any nearby centre.

4.54 *Policy WH03 – Affordable Housing.* Returning to the housing chapter, there is a degree of overlap between this policy and policies WH01 and 02 but only in so far as policy WH03 relates to the setting of occupancy criteria. It is not clear from the drafting of Policy WH03 whether it is intended to apply only to exception sites. The WGPC have now confirmed that it is so intended, in which case the wording needs to be amended to avoid any doubt. Policies WH01 and WH02 do not apply because they refer to mixed tenure sites.

4.55 HCS Policy H2 applies to rural exception sites which states that such sites are on land which would not normally be released for housing. Where there are settlement boundaries the position is clear on the ground. Exception sites are so called because they are permitted as an exception to rural settlement policies which permit development within the boundary only. It means that land values outside the settlement boundaries are lower but if a site is well located, often immediately adjacent to the boundary and satisfying other locational criteria, development may be permitted for affordable housing only, although a small element of open market housing might be permitted should the scheme otherwise not be viable, as provided for in the last part HCS Policy H2.

4.56 It is much less certain how suitable exception sites might be brought forward under the terms of Policy WH01 either as originally drafted or as

recommended to be modified. That is because land which is considered to be contiguous with the existing settlement is likely to be regarded as having potential for housing development

4.57 WNP Policy WH03 is another **example of a policy which doesn't add** anything to the HCS policy. However, as long as there is no unjustified contradiction which would add uncertainty in the interpretation of the development plan taken as a whole I do not regard such duplication as a failure to comply with the basic conditions. The first two bullet points are covered by the HCS policy although the words are different.

4.58 In response to my questions 20 and 23 the WGPC have stated that there is a lack of an evident demand in the short-term for affordable housing but it is a concern and they want to keep the options open. The meeting and interviews with the young farmers certainly suggest that it is a concern of theirs but, as I indicate in paragraph 4.40 above, the questionnaire was not framed in such a way as to identify local need.

4.59 For an exception to policy to be justified HCS Policy H2 requires the proposal to assist in meeting a proven local need. I am informed that the 2008 Planning Obligations SPD remains in effect although pre-dates the HCS. In that respect it does not assist in clarifying what evidence will be required to provide proof of need at the local level. At present the only robust evidence is the 2012 Local Housing Market Assessment<sup>41</sup> which indicates that 56% of all households in the HMA cannot afford market housing without subsidy, 68% of those under the age of 45. Even though the Wyeside group represents only 12% of the HMA housing stock and the socio-economic characteristics will vary across HMA it would seem highly likely that there is a local housing need in Wyeside which cannot be met by open market housing. However, the numbers involved are too low and variants too great to be able to use the HMA statistics at the level of the neighbourhood area with any degree of certainty. That could only be firmly established by a properly structured Local Housing Needs Study, as mentioned in the third bullet point of WNP Policy WH03.

4.60 In the meantime, as the WGPC acknowledge, there is no local evidence to justify any specification of the form of tenure for affordable housing. In the third **bullet point of Policy WH03 it is stated that there is a 'preference' for shared**

---

<sup>41</sup> GL Hearn, paragraph 13.22

equity/shared ownership. The same considerations apply as to the preference on site sizes in Policy WH01; it can be no more than a community aspiration. Also, as indicated in paragraph 4.42 above, the evidence does not support any requirement for two to three bedrooms for affordable housing. For all of these reasons, the third bullet point as drafted does not meet the basic conditions. It needs to be replaced by a more generalised statement that the size and tenure of any affordable housing on exception sites will be in accordance with evidence provided in an up-to-date local housing needs survey.

4.61 The second part of HCS Policy H2 indicates that the housing provided on rural exception sites should be made available to, and retained in perpetuity for, local people in need of affordable housing. The Planning Obligations SPD refers to cascading arrangements but not specifically to local occupancy criteria. Such matters are usually covered in s106 obligations as stated but for the benefit of the plan-user it needs to be stated where the 'local occupancy criteria defined by Herefordshire Council' are, in fact, defined. That may be a Housing, rather than Planning, matter in which case compliance cannot be required in a planning policy. A more flexible wording is required.

4.62 As indicated in paragraph 4.43 above, the final bullet point in this policy is more appropriately applied on mixed tenure sites and is recommended to be merged into a revised Policy WH02 (Modification No. 1). Otherwise the design of dwellings on exception sites is covered by WNP Policy WHD01.

### Recommendation 5

Replace Policy WH03 by the following policy: -

Exceptionally, where there is a proven local need established by an up-to-date local housing needs survey, a site or sites may be developed primarily for affordable housing outside the areas considered suitable for general housing in accordance with Policy WH01. Any permission shall be subject to a s106 planning obligation to ensure that the housing is available to local people and remains so in perpetuity.

4.63 *Policy WH04 – Re-use of Rural Buildings.* This policy refers **simply to 're-use' without stating what uses are intended although its inclusion in the housing section suggests that it covers conversion to residential use.** It is closely modelled on HCS Policy RA5 with bullet points 3, 4, 5 and 8 using precisely the same wording as criteria within the HCS policy. Nothing is achieved by that. Moreover, the inclusion of the second bullet point as a criterion applying to any proposal for



the re-use of existing buildings confuses matters. HCS Policy RA5 makes clear that a proposal which would make a positive contribution to rural business and enterprise and support for the local economy is supported as well as residential use<sup>42</sup>. It is not expressed as requirement for all uses and it would appear from the WGPC response to my question 24 that that was not intended. However, deletion of the criterion would create some uncertainty about how the WNP policy might be interpreted alongside HCS Policy RA5. Even though there would be a great deal of overlap with the HCS policy it would reduce any ambiguity if the wording were to be incorporated into the introductory section rather than included as a bullet pointed criterion and, having regard to PPG guidelines, I recommend accordingly.

4.64 I note the WGPC mention of the use of existing rural buildings for affordable housing for local people but national policy for the conversion of existing buildings in the countryside<sup>43</sup> **to residential use is generally permissive or is 'permitted development' and that is reflected by HCS Policy RA3.4**. Given such a policy background there would need to be a strong local justification for any limitation requiring affordable housing use quite apart from any viability considerations.

4.65 The sixth bullet point is to be covered by the new general policy WF04 (see paragraph 4.48 above) and the final point is an unnecessary cross-reference. Bearing in mind that this policy is likely to apply to individual buildings or small groups of buildings in a very rural area I consider that the inclusion of bullet point 7 would be disproportionate in its impact, difficult to implement and has not been justified by supporting evidence. It is also covered by HCS Policy MT1.3. My comments in paragraph 4.28 above also apply. The criterion should be deleted for those reasons for the plan to meet the basic conditions.

---

<sup>42</sup> The wording in HCS Policy RA5 is 'or which otherwise contributes to residential development'

<sup>43</sup> NPPF, paragraph 55, third bullet point

### Recommendation 6

In policy WH04, delete bullet points 2, 6, 7 and 9 and, in the second line of **the introductory part of the policy, insert the words 'which will make a positive contribution to rural businesses and enterprise and support the local economy or which would otherwise contribute to residential development,' between '...rural areas,' and 'will be permitted where:'**

4.66 *Policy WH05 – Housing in Open Countryside.* It needs to be explicit rather than implicit that this policy applies to new build houses and not to those created through the conversion of existing buildings which is covered by Policy WH04.

4.67 **The term 'open countryside' usually applies to everywhere that is not** within an identified settlement, that is one with a settlement boundary. That is **intimated in the wording of HCS Policy RA3 which refers to 'rural locations outside of settlements' indicating that neighbourhood plans will decide where those** settlements are. That approach has passed muster as being consistent with paragraph 55 of the NPPF. In Wyese there are five villages but two centres in Preston-on-Wye and Moccas so the reference to five centres is misleading. As I have recommended the deletion of one, at Preston Court/Church, there are **six centres. Also, as discussed in paragraph 4.23, the term 'village centre' is used in a** rather wider sense than just the red circles shown on the Policies Maps. It must be clear to what areas of land the policy is intended to apply.

4.68 There is a direct link with the interpretation of Policy WH01 in respect of those areas where general housing development may be permitted. This policy would apply to anywhere outside of those areas. Rather than repeat the wording in Policy WH01 a cross-reference to it has to be included with a similar wording used to that recommended for Policy WH03.

4.69 **Herefordshire Council's DM section regard the policy as being too restrictive** in the context of HCS Policy RA3 and paragraph 55 in the NPPF. That relates to the first two bullet points in the WNP policy. To my mind, it is primarily the phraseology that individual houses will only (my emphasis) be permitted in the circumstances stated that makes it unduly restrictive. Other instances are listed in HCS Policy RA3 which are either covered by other WNP policies or not at all. The latter instance is not a problem because the HCS policy will apply in any event. HCS Policy RA4 also provides a much more detailed set of policy factors in consideration **of proposals for either new agricultural worker's dwellings or for** accommodation to support new rural businesses.

4.70 I do not consider that the first criterion in the WNP policy is any different in intent than either the HCS policies or in national policy. **For clarity the word 'or'** should be inserted before the second criterion. I also consider that the wording of the second criterion leaves open the question as to when a dwelling to support a **viable rural enterprise would be 'required'**. The proper 'test' is that there should be shown to be an essential need for a dwelling to support the enterprise which cannot be met by existing accommodation. I recommend the addition of those words, having regard to paragraph 55 in the NPPF.

4.71 In response to my question 28 the WGPC have accepted that the subject matter of the final bullet point in this policy is covered elsewhere in the plan and **that it might be deleted. Otherwise, the meaning of the term 'neutral or positive environmental impact' would have required** further explanation for clarity in implementation.

Recommendation 7

Modify the introduction to Policy WH05 to read: -

Outside the areas considered suitable for general housing in accordance with Policy WH01 proposals for dwellings associated with agriculture, forestry and rural enterprises will be permitted: -

**Insert the word 'or' between the first and second bullet points.**

**In the second bullet point, delete the words 'which requires an onsite dwelling' and substitute the words 'and that there is an essential need for a dwelling to support the enterprise which cannot be met by existing accommodation.'**

Delete the third bullet point.

4.72 *Policy WHD01 – New Building Design.* The WGPC have suggested a revised wording for the introductory section to this policy because it does not read correctly as currently written. I recommend accordingly. The first part of the policy should also apply to proposal for buildings associated with forestry as well as agriculture as many of the same national policy provisions and similar permitted development rights apply.

4.73 The first bullet point in the first part of the policy, in restricting development to one or two storeys, is prescriptive with nothing in the plan to explain or justify why such a policy restriction would be appropriate in the local context. The fourth bullet point in the same policy would achieve much the same aim and allow for a consideration of the character of the immediate surroundings

to a proposed development. The WGPC have accepted that there are examples of three-storey manor houses and farms in the area. I recommend the deletion of the first bullet point because it has not been adequately justified and is also unnecessary to protect the character of the area. Otherwise, as with other policies, the cross-reference to Policy WE01 is unnecessary.

4.74 The same criteria relating to sustainable construction techniques and sustainable drainage systems (SuDS) are repeated in both parts of this policy as well as in Policy WHD02. The criterion requiring SuDS is prescriptive in stating that all new development must incorporate SuDS (underlining my emphasis). There is no specific justification for such a policy requirement. The Government has made **such systems mandatory only for 'major development'**<sup>44</sup>. However, as indicated in paragraph 5.7 of the WNP the plan area is subject to flooding from the River Wye and the use of SuDS is good practice wherever appropriate, which will depend upon the hydrological setting of the site, as stated in HCS Policy SD3 and **referenced in a representation by Herefordshire's Development Management team**. Having regard to national policy on this matter and for greater consistency with the HCS I recommend that the criterion be amended to be less prescriptive and to recognise that SuDS is not always appropriate. This applies to both parts of Policy WHD01.

4.75 The second part of the policy dealing with agricultural and business buildings is an attempt to cover circumstances in which full planning permission is required and those where the Government has granted permitted development rights subject only to prior approval of the siting, design and external appearance of the building and access arrangements, if required by the LPA.

4.76 I accept that the matters that may be subject to the prior approval procedure are sufficiently wide to warrant being covered by policy. My main **concern is that the meaning of the phrase 'if prior approval exists with permitted development' is somewhat obscure. The introductory section requires** re-drafting to achieve clarity of meaning. For similar reasons to other policies, bullet points 4, 5 and 7 are either covered elsewhere or duplicate other policy provisions in the plan.

Recommendation 8

---

<sup>44</sup> As defined in the Development Management Procedure Order 2015 as 10 or more houses or major commercial development.

Delete the introductory wording to Policy WHD01 and replace by the **words 'Proposals for the erection of new buildings will be permitted provided the following requirements are met:-'**

**Amend the heading of the first part of the policy to 'Non-agriculture/forestry or Business Buildings' and the second heading to 'Agricultural or Forestry and Business Buildings'**

In the first part of the policy, delete the first and final bullet points and **amend the penultimate point by replacing 'must' with 'should' and insert ', where appropriate taking account of the hydrological setting of the site,' after '...(SUDS)'**

In the introductory text to the second part of the policy delete the words **'If prior approval exists with permitted development' and replace by 'Where prior approval is required under the provisions of the General Permitted Development Order<sup>45</sup>'**

Delete bullet points 4, 5 and 7 from the second part of the policy and amend the penultimate bullet point as in the first part.

4.77 *Policy WHD02. Change of Use.* Many of the comments above apply to this policy, including the need to delete the fifth and final bullet points. Despite the heading, it is apparent from the wording of the policy that it is not intended to apply to applications which involve only a change of use but where alterations and, possibly, some extensions are also involved associated with the change of use of the building. For clarity I recommend an amendment to the policy heading and to criterion dealing with SuDS.

Recommendation 9

**Amend the heading for Policy WHD02 to read 'Changes of use and associated building alterations and/or extensions'**

Delete the fifth and final bullet points and amend the penultimate point by **replacing 'must' with 'should' and insert ', where appropriate taking account of the hydrological setting of the site,' after '...(SUDS)'**

4.78 *Policy WE01 – Environmental Restrictions on Development.* There is a significant amount of text included within the coloured 'policy' box which is not policy at all but either of the nature of an explanation for the terms of the policy or

---

<sup>45</sup> The Town and Country Planning (England) General Permitted Development Order, 2015 (or any Order amending or re-enacting that Order)

cross-references to national and local plan policies, including the 'Sequential and Exceptions Test' which is mentioned three times. The additional text detracts from the main thrust of the policy and makes it less than clear. It is also not good practice to refer to exceptions to policies within policies. Much of this text would be better placed within the explanatory sections of the plan.

4.79 The whole of the first paragraph is explanation or justification for the plan. The policy itself starts after the number 1. Herefordshire Council questioned in a representation the basis for specifying a 100 m. exclusion zone from the River Wye SAC. In the WGPC response to my request for clarification I have been referred to correspondence with Natural England during the preparation stages of the WNP in which they mention the possibility of disturbance to otters and a recommendation in the HRA for the Local Plan. However, nowhere is a justification given for a policy which prevents development within the specific distance of 100 m. from the boundary of the SAC. There is nothing in national policy<sup>46</sup> or in the HCS which suggests that development should be totally precluded even should it be judged to have a significant effect on a European site. Habitats Regulations procedures would apply including consideration to the effectiveness of any mitigation measures by Appropriate Assessment. Natural England would be a consultee but any evidence should be submitted to the LPA in the first instance. Having regard to national policy I recommend wording which is closer to that used in HCS Policy LD2. However, I recognise that this may mean that a further Habitats Regulations Assessment of the plan will be required. If there is evidence to justify specifying a 100 m. zone then that will need to be brought forward as part of that process.

4.80 There is a detailed reference in section 1 of the policy to the Sequential and Exceptions tests in the NPPF, even including the ISBN number. Such references result in in-built obsolescence to the plan because the Government has signalled **that the NPPF is to be revised shortly. Also, this 'test' only relates to flood risk and** has nothing to do with the protection of biodiversity or water quality. It should, therefore, be deleted from this section.

4.81 It is rather confusing to refer to undertaking the Sequential and Exceptions tests as exceptions to the policy. National policy is stated clearly within paragraphs 102-104 of the NPPF and there would need to be specific local justification for departing from it. That would not appear to be the intention, rather, given the incidence of flooding from the River Wye, it is important that any proposals for development should have been demonstrated as satisfying the tests. In part these can be put into words but I accept that it is an economical way to

---

<sup>46</sup> In particular NPPF para. 118. See also ODPM Circular 06/2005 which is still extant.

express policy by referring to the tests in this way. However, the plan would be clearer if parts 2 and 3 of the policy were to be combined. Also, it is overly-prescriptive and unnecessary to say that **development 'must' comply with any** other policy either in the WNP or the HCS. HCS Policies SD3 and SD4 apply in any event. The neighbourhood plan need not be a comprehensive guide to all policy applying to the plan area and there is a risk that slight variations in wording might result in uncertainty for decision-makers in interpreting the development plan taken as a whole.

4.82 As mentioned in paragraph 2.02 it is a statutory restriction on neighbourhood plans that they should not include provisions relating to **'excluded development' which includes waste disposal. Requiring any development proposals** in Flood Zone 1 to be in accordance with the Waste Core Strategy could be construed as making such provision<sup>47</sup>.

### Recommendation 10

Delete the whole of the introductory paragraph to policy WE01 and place the text within an explanatory (non-policy) part of the plan to justify the policy approach. Include any required specific references to current Government policy in the text, including an explanation of the sequential and exceptions tests.

Remove the initial two sentences of part 1 of the policy and place them in **the explanatory text. Delete all from 'New developments should not be permitted ...' to, and including, '... ISBN: 978-1-4098-3413-7'. Modify part 1 to read: 'Development will not be permitted which would be likely to have a significant environmental effect on the River Wye SAC unless evidence has been provided that any adverse effects can be avoided ... or Authority;'**

Delete part 4 of the policy and replace parts 2 and 3 by the following text: **'New built development should not be permitted in either flood risk zone 2 or 3 unless, consistent with sustainability objectives, it is established that it is not possible for the development to be located in a zone with a lower probability of flooding and, if appropriate, the exception test has been passed. All development in flood risk areas should be capable of being made safe without increasing flood risk elsewhere.'**

Include any cross-references to relevant HCS policies, such as SD3 and SD4, in the explanatory text.

---

<sup>47</sup> This is the reference in Policy WE01 although the currently adopted plan is the Minerals and Waste Local Plan.



4.83 *Policy WE02 – Landscape Design Principles.* It is well understood how valued is the rural character of the area in its quite special landscape setting. It is within the vision statement and Environmental Objective 3 in particular. The policy is a detailed one and quite prescriptive in parts without any clear justification for a number of the provisions. However, for the most part it is clearly expressed and the degree to which specific provisions might reasonably be applied to any particular proposal is something which will be capable of professional judgement by a decision-maker.

4.84 In the first bullet point there is reference to buildings of statutory and non-statutory heritage value. The former are listed in Appendix 6 but, as the CPRE have commented, there is no list of non-statutory heritage assets. Without such a list the policy cannot be fully implemented. That is something the WGPC will need to bear in mind.

4.85 It is stated at the start of the policy that it applies to all development proposals although the WGPC have agreed that minor householder development might be excluded. I have considered the practicality of including such provision in policy but it would then require a **definition of what is meant by 'minor'**. Householder development can include quite sizeable extensions which could have a significant visual impact. On balance I consider that it is only the second bullet point requiring detailed landscape impact analysis which should include a **qualification. The most flexible way to do that is to include the words 'where appropriate' providing discretion for the decision-maker** in the particular circumstances of a planning application.

4.86 As the sixth bullet point refers **to the 'planting of local species'** it is obviously referring to plant species and my question 36 was seeking clarification as to whether it means trees or bushes or all plants. It can be left to the discretion of the decision-maker.

4.87 It is the penultimate (ninth) bullet point in this policy which is the most problematic. I saw for myself when I visited the area how important orchards are and the way in which they contribute to the character. It is Herefordshire after all! The wording of the first part of the policy can only be interpreted as meaning that planning permission for development will be refused unless the criteria are met. **There is no other way to 'resist' it. But in their response to my question 37 the WGPC have 'hit the nail on the head'. There is no practical way to prevent the grubbing out of orchards unless they are judged to be so important that they warrant the making of a Tree Preservation Order which would need to be justified on the basis of the visual contribution to character rather than biodiversity.**

Reluctantly, I conclude that this provision is not capable of implementation and so does not meet the basic conditions. I recommend deletion for that reason.

Although it is land-use related it is in the nature of a community aspiration that orchards should not be lost to development or, if they are, that they be replaced.

A statement to that effect could be included elsewhere in the plan as a signal to developers but it must be clearly distinguishable from policy<sup>48</sup>. In addition, orchards are included in the list to be protected and enhanced under Policy WE03.

4.88 I have also pointed out that if a site was being developed any planning condition(s) relating to the provision of a landscaping scheme could only apply to land within the ownership and control of the applicant. It would be possible for the LPA to refuse permission if adequate landscaping was not a feasible proposition but requiring an area at least equivalent to that being lost to be replanted could act as a significant constraint on development especially for the larger sites proposed in the plan. That is contrary to Government policy and so does not meet the basic conditions. There should be no difficulty in requiring a landscape scheme to include **'an equivalent range of varietal fruit species'**.

Recommendation 11

In policy WE02:-

**Re-word the second bullet point to commence 'Where appropriate, taking account of the nature and scale of the proposed development, a detailed landscape impact analysis should be provided as part of the planning application to demonstrate how ...'**

In the penultimate (ninth) bullet point delete the whole of the first sentence – **'Development ...wildlife habitat.'** – and the words at the end of the second sentence – **'of at least the equivalent size to that which has been lost.'**

Clearly distinguish from policy any deleted text which represents a community aspiration.

4.89 *Policy WE03. Protecting Local Green Spaces etc.* Similar considerations apply to Policy WE02 in so far as this policy relates to **'all new development'**. A **qualification of 'where appropriate'** would provide similar flexibility in application.

4.90 The introductory part of the policy refers to the Herefordshire Green Infrastructure Strategy. That is mentioned in HCS paragraph 5.3.21 with details of

---

<sup>48</sup> PPG, reference ID: 41-004-20140306

the factors which contribute to green infrastructure given in paragraph 5.3.22 under Policy LD3. Archaeological, historical and cultural features mentioned in the first bullet point of WNP Policy WE03 have nothing to do with green infrastructure and are covered by HCS Policy LD4. Including them under a heading of green infrastructure somewhat clouds the policy intent and requires different treatment **because the word 'enhance' does not appear in HCS Policy LD3 and it is too strict a requirement, without specific justification, to apply it for green infrastructure. Even in HCS Policy LD4 the word 'enhance' is qualified by 'where possible'.** A restructuring is needed to ensure clarity in application of this bullet point.

4.91 The main issue with regard to this policy is the manner in which the **protection of 'green spaces, views and vistas valued by local residents'** is mentioned in the last part of this policy along with the designation of a Local Green Space at Bredwardine. As Herefordshire Council and the CPRE have stated it would be useful to know where the green spaces views and vistas are. I go further to state that without such indication there is nothing in the plan to protect these areas in their own right apart from the proposed Local Green Space in Bredwardine as discussed below. However, in general terms, a degree of protection when development is proposed is achieved by the second bullet point in Policy WE02 and the first bullet point in this policy WE03. Policy WE01 deals with biodiversity, water quality and flood risk not landscape protection. As written the final part of Policy WE03 is not a policy statement but a factual statement cross-referencing to other policies which is more appropriate within the supporting text.

4.92 I now turn to the treatment of the Local Green Space (LGS) in the plan. The WGPC have agreed that this is best dealt with as part of Policy WE03 rather than as a criterion in policy WH01. This would include the detailed description of the area covered by the intended LGS and the policy intention to protect it from development. That is what designation as an LGS would achieve because it would carry with it the national policy for such areas as set out in paragraph 78 of the **NPPF, which is 'consistent with policy for Green Belts'. That is very important** because it means, in practice, that planning permission should not be granted for **anything which is regarded as being 'inappropriate' unless there are very special** circumstances. It is a very strict test but Government policy does not go so far as to exclude development completely as might be suggested by the wording in WNP Policy WH01 for the LGS.

4.93 It is for that reason that it is stated at the start of paragraph 77 of the **NPPF that 'Local Green Space** designation will not be appropriate for most green areas or open space.' **And that the designation should only be used when the**

circumstances listed in the three bullet points in paragraph 77 apply. There is also some further guidance on the matter in the PPG. It is not a designation to be treated lightly and there must be evidence to show in what way(s) any proposal for LGS in a plan meets the paragraph 77 criteria.

4.94 There is nothing in the plan to explain why, or in what way, it is considered that the area shown on the Policies Map in Bredwardine as an LGS meets any of the requirements for designation set in Government policy. Indeed, it is a facet of this plan that the evidential basis for the policies within it is extremely sparse or non-existent. This is case in point. It is in paragraph 5.4 that I might have expected to see something to justify the natural environment policies putting objectives 4 and 5 into effect, but the statements thereunder simply put forward policy in slightly different words from that used in the coloured policy boxes.

4.95 In the light of the above I might have recommended that the Local Green Space be deleted because adequate regard had not been had for Government policy and because of the lack of any proportionate and robust evidence. However, I decided to provide an opportunity to the WGPC in response to my question 41 to bring forward evidence to support the designation in the terms expressed in paragraph 77 of the NPPF. I also looked at the area myself on my visit. It is a relatively large area but it is split by the lane leading to the church. It is a fine tract of land and I agree that the views of the river and bridge from the path leading down from the church have a special quality. The WGPC have supplied much more background information in their response on the importance of the area to the local community and also some historical associations. Taking these into account I accept that the area does meet the NPPF criteria and may be included in the plan as a Local Green Space. However, the last section in policy WE03 incorporating what is in Policy WH01 in the submitted plan requires revision to make the policy context clear. A concise statement is also required under paragraph 5.4 of the text setting out the factors mentioned in NPPF paragraph 77 which justify the designation.

4.96 In view of the revised emphasis of this policy the heading is not, actually, correct. It is about Green Infrastructure, Heritage Assets and Local Green Space. I recommend amendment to the heading as the correction of an error.

Recommendation 12

**Revise the policy heading for Policy WE03 to 'Protecting Green Infrastructure, Heritage Assets and Local Green Space'**

**Amend the introductory section of Policy WE03 to read: 'Where appropriate, development proposals should demonstrate that ...'**

**In the second bullet point, delete the words 'enhancing' and 'and archaeological, historical and cultural features'**

**After the bullet points insert: 'Archaeological, historical and cultural features will be protected and, where possible, enhanced.'**

Delete the final paragraph in the policy and substitute:

**'The area of land comprising the orchard opposite the Red Lion in**

Bredwardine, the orchard bordered by Church Lane, the River Wye and the road running from the Red Lion to Bredwardine Bridge is shown on the Bredwardine Policies Map, Plan Appendix 5, as a Local Green Space. In this area inappropriate development will not be permitted except in very **special circumstances.'**

Include additional text in paragraph 5.4 of the plan to justify the designation of the area as a Local Green Space in the terms of paragraph 77 in the NPPF.

4.97 *Policy WE04 – Renewable Energy* The WGPC have clarified that the policy is intended to 'encourage' renewable energy development generally within the plan area subject to the criteria in policies WHD01 and WHD02 except in the areas to which policies WE01 and WE03 apply. For the purpose of development management decision-making encouragement is achieved by the grant of planning permission.

4.98 As I have indicated elsewhere, statements within a policy that it is subject to another plan policy is not necessary and can make the intention behind a policy less clear. However, policies WHD01 and 02 together apply in most circumstances and the criteria within those policies might easily be applicable in the consideration of proposals for renewable energy development. Rather than repeat all of the criteria in those policies a cross-reference to them would be an economical way of achieving that aim. However, it needs to be clarified that it is the criteria which apply. Where appropriate the policies themselves will apply in any event.

4.99 **For the plan to be clear the term 'historical buildings' in the first bullet point requires definition.** The WGPC have also accepted that an amendment is required to recognise that solar panels may be permitted on the roofs of historic buildings if no harm would be caused to the heritage asset. An appropriate balance has to be struck.

4.100 The meaning of the second bullet point is not clear. It is ambiguous. That is because policies WE01 and WE03 are only applicable in the restricted areas to which they apply, that is within 100 m. of the River Wye SAC or in flood risk areas (WE01) or within the LGS (WE03). To say that solar panel farms will only be permitted subject to those policies means only within those restricted areas which, as the WGPC have clarified, is not the intention. If accepted, Recommendation 12 above would mean that wind turbines and solar panel farms would be permitted within the LGS only in very special circumstances. Policy WE01 provides strict safeguards for any development within the areas to which that policy applies. Cross-referencing those two policies in particular when Policy WE02 also applies adds to the ambiguity. All of those policies would be applied any way. For all of these reasons I consider that specific reference to solar panel farms adds nothing to the plan and should be deleted to avoid the ambiguity. The general **'encouragement' given in the introduction to the policy would then apply subject to all relevant policies in the development plan, taken as a whole.**

4.101 Similar considerations arise in the third bullet point. It is further complicated by the fact that the first two lines are not policy but background **information and there is no definition of what is meant by a 'small' wind turbine.** All such material should be included within the supporting text, not policy. I have drawn attention to the last part of HCS Policy SD2 which, in line with Government policy, is that wind turbines should only be permitted if a site (my emphasis) has been identified in a plan with community support. The only distinction is for **'microgeneration' which is permitted development**<sup>49</sup>. Therefore, a generally worded policy of encouragement, even for small wind turbines, does not have regard to national policy and should be deleted. Including a statement in policy repeating and cross-referencing to HCS Policy SD2 would achieve nothing but could be included as a factual statement within the plan text, for information.

### Recommendation 13

Modify the introductory section of Policy WE04 by deleting the words **'where they are in compliance with WHD01 or WHD02 above.'** and **substituting 'subject to the relevant criteria in Policy WHD01 or Policy WHD02.**

**In the first bullet point, delete the words 'Solar panels are not permitted on roofs of historical buildings.** However, ground based solar panels will

---

<sup>49</sup> GPD0 2015, Schedule 2, Part 14 Classes H and I.

**...’ and substitute ‘Solar panels are permitted** on roofs of historical buildings if an assessment proves that there will be no harm to building. **Ground based solar panels will also ...’ Include a definition of the term ‘historical buildings’ in the supporting text.**

Delete the second and third bullet points from the policy but include supporting text to clarify the position with regard to solar panel farms and small wind turbines, including a definition of the term, and providing a cross-reference to the policy in HCS Policy SD2 that a site for a wind turbine may be permitted if it has community support.

4.102 *Policy WE05 – Sewerage and wastewater treatment.* As Herefordshire Council have stated, the heading to this policy is actually a policy and is word for word the same as in the first paragraph. I note that the policy was introduced in response to a representation made by Welsh Water (DCWW) on the draft Regulation 14 plan. It does, however, contain statements and background material which needs to be separated out from policy. Also, it would normally be expected that a plan would not promote development which would result in either the public sewerage network or the wastewater treatment works becoming overloaded. This is especially important given the proximity to the River Wye SAC as stated in HCS Policy SD4. Any possible phasing or delaying of development should be a decision taken as part of the plan-making process not through development management. Taking this into account, and in the interests of clarity, I recommend a simplified policy with all of the background information moved to the supporting text including the note at the foot of page 36.

4.103 HCS Policies SD3 and SD4 are detailed policies which provide a firm context for the consideration of development proposals in the area especially any which might compromise water quality and affect the River Wye SAC. To a degree this is covered by WNP Policy WE01. However, for those areas where mains drainage is not available, including the smaller villages of Blakemere and Tyberton, any development would need to be served by what are called non-mains alternatives for which detailed alternatives are included in HCS Policy SD4. Rather than repeat that wording a cross-reference would, exceptionally, be appropriate as in the second bullet point of the WNP policy as submitted.

Recommendation 14

Modify Policy WE05 to read: -

Public sewerage and wastewater treatment



Development at Bredwardine, Moccas and Preston-on-Wye should minimise any effect on the capacity of the public sewerage network and/or wastewater treatment works serving those villages. If a development proposal would result in the existing capacity being exceeded financial contributions will be sought for any improvements necessary to facilitate such development.

Elsewhere, any **new housing growth will be required to utilise ... (as in the second bullet point of the submitted WNP policy)**

Remove all other explanatory and background text from the policy box and place it within the supporting text for this policy, including the Note at the foot of page 36.

4.104 *Policy WF01 – Retention of Existing Recreational Facilities.* In response to my question 45 the WGPC have acknowledged that the policy as framed does not reflect national policy as stated in paragraph 74 of the NPPF and suggest the addition of words to take account of situations where a facility is no longer required or is to be replaced by a facility of at least equivalent value. I agree that to be necessary to meet the basic conditions. For the avoidance of doubt I recommend the wording used in the NPPF.

Recommendation 15

Add the following words **to the end of Policy WF01: 'except where an assessment has been made which demonstrates that the land is surplus to requirements or that the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.'**

4.105 *Policies WF02 and WF03.* Both of these policies refer to developments **being encouraged. The WGPC response to my question 'how' is** that it will be through the active involvement of the Parish Council. That I do not doubt, but such activities fall outside the scope of a statutory development plan.

Nevertheless, they do provide a steer for the LPA to be aware that any planning application in which such forms of development is proposed might expect to be receive approval provided all other plan policies are satisfied. My recommendation No. 1 applies to the cross-references.

4.106 *New Policy WF04 – General Policy Applicable to all Developments.* This policy has been suggested by the WGPC in response to my comments and question 4 on the matter. It has been suggested to avoid undue duplication of criteria in a number of policies in the plan to make it clearer and more easily interpreted for the

purpose of determining planning applications. The plan will then meet guidance on such matters in the PPG.

#### 4.107 I queried the meaning of 'adequate' in relation to parking provision.

Without any indication of what might be regarded as adequate the plan-user, and for that matter a developer or decision-maker will not have any indication of what is expected for a development proposals to be likely to receive planning **permission. The WGPC now make reference to Herefordshire Council's Design Guide for New Developments, July 2006, but that is no more than a guide and is not a document which forms part of the development plan. It is not a planning document. It is a general rule that planning policy should not require compliance with standards which have been set elsewhere and have not been subject to scrutiny through an independent examination process. However, I note that HCS Policy MT1(6) requires regard to be had to the Highways document and the Local Transport Plan. That form of words is acceptable and I adopt it in my recommendation below for the new policy.**

#### Recommendation 16

Insert a new Policy WF04 in section 6 of the plan as follows:

##### General Policy Applicable to All Developments

Ensure that traffic generated by any proposal can be accommodated safely within the local road network which in many cases is single track, and does not result in the need to widen roads along their entire length or the removal of hedgerows, except where additional passing points are needed to manage increases in traffic volumes, demonstrate that landscape, environmental and amenity impacts are acceptable, and that access and parking standards are adequate having regard to the latest highways guidance produced by Herefordshire Council.

#### 4.108 *Correction of errors, including updating and consequential amendments.*

In their consideration of the recommendations I have made for modifications to the plan, the LPA has the power to correct errors, amongst other things. This may include making amendments to the supporting text which flow from modifications to the plan policies and by way of updating.

4.109 There are no obvious textual errors in the plan. However, it will be necessary to ensure that it reflects the final stage in the process. For example some text, including section 2, will need to be updated with references to the draft **plan removed. I am making a 'catch-all' recommendation to authorise**

amendments which will be necessary consequentially upon my recommendations for modifications to the policies in the plan.

### Recommendation 17

Ensure that all procedural references in the plan are up-to-date and make any amendments to the supporting text in the plan which is required as a consequence of modifications to the policies made in response to the recommendations in this report.

Draft

### Annex A

#### Recommendation 2 - Modification No. 1

#### Replacement Policies WH01 and WH02

##### Policy WH01 – New Housing Development

Permission will be granted over the period 1 April 2017 until 31 March 2031 for the development of around 33 dwellings. These will include single developments for more than 10 dwellings in each of the villages of Bredwardine and Preston-on-Wye with the remainder on smaller sites mainly in Moccas.

All new housing development should reflect the size, role and function of the village in which it is situated on land which is contiguous with the existing village centre; that is on a site which immediately adjoins the centre as shown on the Policies Maps or is within or abuts a group of existing buildings which are contiguous with the centre. However, where land on the opposite side of a road from the centre is a green space (no houses having been built in that location) no housing development will be allowed in that area.

In addition, proposals for new housing should reflect the character of the village and surrounding environment and relate directly to the existing built form in the immediate vicinity. Also, in so far as it is reasonably practicable and viable, any development for three or more houses should be laid out in the form of an organic cluster built off a new access lane avoiding the use of a cul-de-sac, with pedestrian links/ pathways to the rest of the village.

##### Policy WH02 – Ensuring and appropriate range of tenures, types and size of houses

Open market housing should include a mix of predominantly two and three bedroomed properties.

Housing developments of more than 10 dwellings in Bredwardine and Preston-on-Wye should include an element of affordable housing in accordance with Policy H1 in the Herefordshire Core Strategy. These houses should be integrated with open market housing across a site and

should be designed so as to be visually indistinguishable from such housing.

Policies Map for Preston on Wye.

Delete the red circle denoting a village centre around the parish church by Preston Court.

Section 5 - Formal conclusion and overall recommendations including consideration of the referendum area

Formal Conclusion

5.01 I conclude that the draft plan, subject to the modifications recommended in this report, meets the basic conditions as set out in Schedule 4B to the Town and Country Act 1990 (as amended), does not breach and is otherwise compatible with EU obligations and is compatible with Convention Rights. Modifications also need to be made by way of the correction of errors to ensure that the plan is up-to-date. Overall Recommendation A.

I recommend that the modifications specified in section 4 of this report be made to the draft Wyeseide Neighbourhood Plan and that the draft plan as modified be submitted to a referendum.

The referendum area

5.02 As I have recommended that the draft plan as modified be submitted to a referendum I am also required under s10(5)(a) of Schedule 4B to the Town and Country Planning Act 1990 to recommend whether the area for the referendum should extend beyond the neighbourhood area.

5.03 There have been no representations seeking an extension of the referendum area. The fact that the neighbourhood area covers a grouping of parishes with a single council suggests a strong commonality within the group. The area is also well constrained physically to the north and south. No cross-boundary issues have been identified. Consequently, I find there to be no justification for extending the referendum area beyond the designated neighbourhood area.

Overall Recommendation B.

The area for the referendum should not extend beyond the neighbourhood area to which the plan relates.

Signed:

*John R Mattocks*

JOHN R MATTOCKS BSc DipTP MRTPI FRGS

1 September 2017

## APPENDIX 1.

### Abbreviations used in this report:

'the Act'	The Town and Country Planning Act 1990, as amended
CPRE	Campaign to Protect Rural England
DM	Development Management
GPDO	The Town and Country Planning (General Permitted Development) (England) Order, 2015
HC	Herefordshire Council
HCS	Herefordshire Local Plan – Core Strategy (CS)
HMA	Housing Market Area
EU	European Union
LGS	Local Green Space
LPA	Local Planning Authority
NP	Neighbourhood Plan (generic term)
NPPF	The National Planning Policy Framework ('the Framework')
PPG	(national) Planning Practice Guidance
SAC	Special Area of Conservation
SCI	Statement of Community Involvement
SEA	Strategic Environmental Assessment
SPD	Supplementary Planning Document
SuDS	Sustainable urban Drainage System(s)
WNP	Wyese Neighbourhood Plan ('the Plan')
WGPC	Wyese Group Parish Council ('the PC')
YFC	Young Farmers' Club
'the 2012 Regulations'	The Neighbourhood Plans (General) Regulations 2012 (any reference to a Regulation number is to these Regulations)

**From:** Samoyedskye@aol.com [mailto:Samoyedskye@aol.com]

**Sent:** 05 September 2017 11:06

**To:** francisrst@hotmail.co.uk; dennis\_price@btconnect.com; whittallmoccas@gmail.com; jeffnewsome@hotmail.co.uk; dockerdale@googlemail.com; david@conveniencecompany.com;

# Wyeside NDP 2011 – 2031: Consultation Statement

---

jeanpugh@fsmail.net; jc.darbyshire@gmail.com; simon@raven-cottage.com;  
ashleysmithengineering@gmail.com; suecrossend@gmail.com; willwhittall@gmail.com

**Cc:** pprice@herefordshire.gov.uk

**Subject:** Fwd: Report on the examination of the Wyeside Neighbourhood Plan

Dear Councillors

Please see the examination report from Mr Mattocks for your information.

There will be an update on this at the WGPC Meeting on Wednesday.

Thank you

Kind regards

Alison

**From:** Samoyedskye@aol.com [mailto:Samoyedskye@aol.com]

**Sent:** 11 September 2017 15:13

**To:** francisrst@hotmail.co.uk; dennis\_price@btconnect.com; whittallmoccas@gmail.com;  
jeffnewsome@hotmail.co.uk; dockerdale@googlemail.com; david@conveniencecompany.com;  
jeanpugh@fsmail.net; jc.darbyshire@gmail.com; simon@raven-cottage.com;  
ashleysmithengineering@gmail.com; suecrossend@gmail.com; willwhittall@gmail.com;  
annieclipson@btinternet.com; ahlmgroad@gmail.com; pprice@herefordshire.gov.uk;  
mwgmh@waitrose.com

**Subject:** Wyeside Group Neighbourhood Plan AGENDA for Meeting 20/09/17 Moccas 7.30pm

Dear Councillors and Steering Group Members

## **Wyeside Group Neighbourhood Plan - Special Meeting 20/09/17 Moccas 7.30pm**

There will be a special meeting of the Parish Council, and Neighbourhood Plan Steering Group Members, on Wednesday 20th September at the Moccas Village Hall Meeting Room from 7.30pm.  
**Agenda attached.**

All are very welcome, an agenda and further details of the discussion points will follow.

This will be an important opportunity to review the Plan before the Referendum referral.

Looking forward to seeing you.

Kind regards

Alison

***Mrs Alison Wright***  
***Parish Clerk***  
***Wyeside Group***  
***01981 250860***

**Agenda attachment below:**

## **Wyeside Group Parish Council**

*Blakemere, Bredwardine, Moccas, Preston on Wye, Tyberton*

## **Neighbourhood Plan Steering Group and Extraordinary**



## Parish Council Meeting

All are invited to a Meeting on Wednesday 20<sup>th</sup> September 2017 in  
The Village Hall, Moccas, at 7.30pm

### AGENDA

1. Apologies for absence and welcome
2. Declarations of Interest
3. Hereford Council employment growth predictions underpin the target of 33 more new houses for Wyese. Employment has been flat-lining in Wyese for the last 10 years or so. What evidence exists that employment prospects are likely to increase across the five parishes to 2031?
4. The plan sets out the development of predominantly 2 and 3 bedroom houses, although 1 and 4 bedroom houses will also be built where there is market demand. Do we agree?
5. The plan sets out that development will be contiguous to existing village centres. Review why this approach was chosen over settlement boundaries and how it relates to the policy of retaining historical spacing between houses in village centres.
6. Dead end cul-de-sacs were rejected by the plan steering committee in favour of RIBA best practice: The policy states: “In so far as it is reasonably practicable and viable, any development for three or more houses should be laid out in the form of an organic cluster built off a new access lane avoiding the use of a cul-de-sac, with pedestrian links/ pathways to the rest of the village.” Review why this approach was chosen
7. Policy WE03 to ‘Protecting Green Infrastructure, Heritage Assets and Local Green Space’ applies to heritage assets and one local green space identified in the plan, Bredwardine orchards adjacent to the church and bridge, due to its potential use as development land. What other protections exist for rural areas within the plan?
8. Review the potential development sites provided to the Examiner to prove target of 33 house could be met. Consider requirements for Bredwardine, Moccas and Preston-on-Wye, and whether we should publish these or modified versions of potential sites prior to referendum.

9. Plan sets no targets for Blakemere, Tyberton or Preston Court. Examiner suggests Hereford Council policy RA2 for small developments will apply. Do we agree?

10. To deliver affordable housing we included in the plan “developments of more than 10 dwellings for Bredwardine and Preston-on-Wye to include an element of affordable housing”. On the basis that this was the only way we could require developers to build affordable housing under the National Planning Policy Framework.

- a. Are more than 10 dwellings per development site in the two larger villages feasible?
- b. The examiner has set a notional cap of 33 new houses to 2031 which could stop smaller developments in the two larger villages. Does this mean we need to remove development sites for more than 10 dwellings from the plan?

11. If we remove the requirement for developments of more than 10 dwellings, what other means of delivering affordable houses may be feasible?

12. WGPC Review of any concerns and then sign-off version of plan to go forward to referendum.

Alison Wright  
CHAIR of STEERING GROUP and SECRETARY  
Parish Clerk  
Longfield House, Gooses Foot, Kingstone, Herefordshire HR2 9NE  
Tel: 01981 250860  
E mail: [samoyedskye@aol.com](mailto:samoyedskye@aol.com)

# Wyese NDP 2011 – 2031: Consultation Statement

---

**From:** Samoyedskye@aol.com [mailto:Samoyedskye@aol.com]

**Sent:** 26 September 2017 17:20

**To:** sbanks@herefordshire.gov.uk

**Cc:** jc.darbyshire@gmail.com

**Subject:** Wyese Group NDP following on from examination

Dear Sam

**Subject: Wyese Group Parish Council Special Meeting held to discuss the Neighbourhood Plan Examiner's Report on 20 September 2017 at 7.30pm in the Moccas Village Hall**

Please would you pass on to John Mattocks, the Examiner, Wyese Group Parish Council's (WGPC's) thanks for the amount of work he has undertaken on our behalf. His thoroughness of approach, care in exploring the Wyese Neighbourhood Plan requirements, and due diligence has been exemplary. We appreciate the necessary improvements he has made to the plan preparatory to a referendum.

We are particularly grateful for his addition, in italics, to Policy "WH03 – Affordable Housing", which now states:

*"Exceptionally, where there is a proven local need established by an up-to-date local housing needs survey, a site or sites may be developed primarily for affordable housing outside the areas considered suitable for general housing in accordance with Policy WH01. Any permission shall be subject to a s106 planning obligation to ensure that the housing is available to local people and remains so in perpetuity."*

It is anticipated that most developments will follow historical norms of 2-5 houses per development site. This is a reflection of historical demand, and "lead time to sale" risk in a sparsely populated rural area with limited infrastructure, such as that experienced in Wyese.

Consequently, the new WH01 Policy Statement "These will include single developments for more than 10 dwellings, in each of the villages of Bredwardine and Preston-on-Wye" as a means of delivering affordability housing, will be the exception, and may not be feasible.

If this policy is treated as a priority by planners for Bredwardine and Preston-on-Wye at the expense of smaller developments, which can more easily fulfil the target of 33 houses, it could also unduly constrain housing development.

The WGPC has concluded that affordable housing is best addressed in Wyese by the new Policy WH03 – Affordable Housing, set out above which was recommended by the Examiner, and that the sentence in Policy WH01 – New Housing Development: *"These will include single developments for more than 10 dwellings, in each of the villages of Bredwardine and Preston-on-Wye with the remainder on smaller sites mainly in Moccas"* is no longer necessary.

It already exists as an aspiration in Policy WH02 – Ensuring an appropriate Range of Tenures, Types and Size of Houses: *"Housing developments of more than 10 dwellings in Bredwardine and Preston-on-Wye should include an element of affordable housing in accordance with Policy H1 in the Adopted Core Strategy."* recommended by the Examiner.

In addition, the WGPC requested, at short notice, a new sentence in Policy WH01 to protect an orchard and arable land at the behest of a landowner, This sentence states: *"However, where land on the opposite side of the road from a centre of a village, is a green space (no houses having been built in that location) no housing development will be allowed in that area."*

## Wyese NDP 2011 – 2031: Consultation Statement

---

This request was made without providing a complete set of information to the Examiner, for which we apologise, and if the sentence is included in Policy WH02 would block potential development sites. The concern raised by the landowner has been addressed by other means, and as such this requirement is no longer needed.

To summarise, if these two sentences can be removed from Policy WH01 the WGPC will accept all of the other recommendations in their entirety, and proceed to referendum with the updated plan completed by the third week in October 2017, as requested.

Thank you

Yours sincerely

Alison

*Mrs Alison Wright*

*Parish Clerk*

*Wyese Group*

*01981 250860*

**From:** Banks, Samantha [mailto:sbanks@herefordshire.gov.uk]  
**Sent:** 27 September 2017 09:11  
**To:** Samoyedskye@aol.com  
**Cc:** jc.darbyshire@gmail.com  
**Subject:** RE: Wyese Group NDP following on from examination

Dear Alison,

Thank you for the comments from the parish council with regards to the meeting held last week.

I note the request to removed two of the sentences requested as a modifications from the examiner. However, in line with the regulations, if any modifications are made which do not fully reflect the examiners recommendation, a further 6 week consultation period is required and a possible further examination depending on the comments received.

Herefordshire Council would not be willing to support this action given the extensive examination the plan has just been subject to. At this stage the decision for the parish council would be to either support the modifications in full or withdraw the plan.

Happy to discuss this further if required.

Kind regards

Sam

**From:** Banks, Samantha [mailto:sbanks@herefordshire.gov.uk]  
**Sent:** 27 September 2017 11:06  
**To:** John Darbyshire <jc.darbyshire@gmail.com>; Samoyedskye@aol.com  
**Cc:** Price, Philip (Cllr) <pprice@herefordshire.gov.uk>  
**Subject:** RE: Wyese Group NDP following on from examination

## Wyeseide NDP 2011 – 2031: Consultation Statement

---

Both,

The role of the examiner ends once his report has been issued. There is no ability for the examiner to review and reissue his report once published. Therefore no further information can be sent to the examiner.

It is the role of the Local Planning Authority (HC) to consider the examiners recommendations and issue the Decision Document. If the recommendations meet the Basic Conditions and do not breach any European Legislation then it is required to move to referendum.

The Council can be open to a legal challenge regarding the consideration of the examiners recommendations and the decision its makes upon them, therefore we will always proceed with caution with regarding to any movement away from the examiners recommendations. The decision to move away from the Examiner's recommendations should not be taken lightly.

Any recommendations that differ from the Examiner's recommendations will result in a further 6 week consultation and the issue referred to a further examination. In effect going back to Reg16.

I hope this has clarified the current position with regards to the regulations and procedures.

Kind regards

Sam

**From:** Banks, Samantha [mailto:sbanks@herefordshire.gov.uk]  
**Sent:** 27 September 2017 14:52  
**To:** John Darbyshire <jc.darbyshire@gmail.com>  
**Cc:** Price, Philip (Cllr) <pprice@herefordshire.gov.uk>; Samoyedskye@aol.com  
**Subject:** RE: Wyeseide Group NDP following on from examination

Dear John,

I will respectfully ask the examiner to read the emails however in my opinion it will be unlikely that the Examiner will revise and re-issue his report at this stage. Within the regulations decision on the modifications rests with the Local Planning Authority so he will have the option to say that this is where the decision lies.

In order to address the parish concerns', please be aware that we will be required to place the referendum preparation on hold. This will mean that the date in November may not be possible.

The Local Planning Authority (HC) are required to issue a Decision Statement on the Examiner's report by the 2 October. It is unlikely that this will be resolved in time for us to meet the regulations. This could place HC was risk of legal challenge. This may require additional actions to be taken by Friday to reduce this risk.

However, if the Examiner does revise the report, this will enable a further 5 weeks before the decision document needs to be issues but will delay the referendum into the new year.

Once I hear from the Examiner, I will contact the parish council again.

Kind regards

Sam

## Wyese NDP 2011 – 2031: Consultation Statement

---

**From:** Banks, Samantha [mailto:sbanks@herefordshire.gov.uk]  
**Sent:** 29 September 2017 16:09  
**To:** John Darbyshire <jc.darbyshire@gmail.com>; Samoyedskye@aol.com  
**Subject:** Wyese Group NDP post examination

Good afternoon both,

As requested I contact the examiner who undertook the recent examination of the Wyese NDP to highlight the issues you have raised and I have also spoken to Cllr Price this afternoon.

I have attached the Examiner's response for information below. He has reiterated that the examination has closed and he will not reconsider the points raised. These should be considered by the LPA as part of the Decision Document due to be issued on Monday.

The LPA can make recommendations which are different from the independent examiners report in exceptional circumstances where the suggested change does not meet the Basic Conditions or is contrary to European legislation. However, this then required a further 6 week consultation period and a further or re-opened examination. The plan could only proceed to referendum in November if all the examiner's modifications were made unaltered, arrangements for this referendum have currently been placed on hold. The route not to accept all the examiner's modifications has not been taken within Herefordshire previously and probably by only 1% of plans across the county as it faces a risk of legal challenge.

The more likely alternatively is that the parish council can withdraw the plan to review the policies to ensure that they meet community aspiration whilst taking on board the examiner's concerns. Then undertake an additional Reg16 consultation followed by a further examination. This has occurred in two previous cases.

I have sympathy of the issues raised by yourselves, the parish council and local community however we must ensure that we proceed appropriately to reduce any risks.

Happy to discuss this further on Monday if required.

If you have any queries, please feel free to contact me.

Kind regards

Sam

From: John Mattocks

I am sure that you will have interpreted my e-mail of 1 September as it was intended. That was to ensure if there were matters which required clarification and you, Herefordshire Council, felt some additional explanation on my part would be beneficial then you might ask me about it.

This is not a request for clarification. I based my recommendation on the replies the WGPC had provided to my detailed list of questions as part of the examination. It appears that the Parish Council, albeit in response to my report, are now seeking a quite significant change to the approach taken in the submitted plan.

## Wyeside NDP 2011 – 2031: Consultation Statement

---

I have submitted my report with recommendations to yourselves as the LPA. The examination is closed. I am not in a position to consider the points now raised by the WGPC outside of the examination. The next stage in the process is for the LPA to consider my report in accordance with s12 of Schedule 4B to the Act and Regulation 18. Those provisions allow for the LPA to make modifications to the plan which differ from my recommendations, giving reasons for so doing. Should the LPA consider that the examination should be re-opened so that I might consider the points raised by the WGPC you have the discretion so to do and to re-appoint me, or another examiner, to undertake that task.

I do not intend to take any further action on this matter unless I am formally requested to do so in accordance with the statutory provisions.

Regards

John Mattocks

**From:** Banks, Samantha [mailto:sbanks@herefordshire.gov.uk]  
**Sent:** 05 October 2017 12:05  
**To:** John Darbyshire <jc.darbyshire@gmail.com>  
**Cc:** Samoyedskye@aol.com  
**Subject:** RE: Wyeside Group NDP post examination

Both,

I am seeking an update on the likely timescales for the parish councils intention on whether they will be progressing or withdrawing their NDP. As you will be aware that HC were required to issue the Decision Document on the 2 October therefore we require a understanding of the likely timescale delay.

Kind regards

Sam

**From:** Samoyedskye@aol.com [mailto:Samoyedskye@aol.com]  
**Sent:** 05 October 2017 12:09  
**To:** sbanks@herefordshire.gov.uk  
**Cc:** jc.darbyshire@gmail.com  
**Subject:** Re: Wyeside Group NDP post examination

Dear Sam

The Wyeside Group PC met last evening, looked at the options and has resolved to withdraw the plan for the time being, make the changes, re-consult with the revised plan and then re-present for examination. Please can you advise the PC on the process for this to happen?

Thank you for your continued assistance.

Kind regards

Alison

**From:** Banks, Samantha [mailto:sbanks@herefordshire.gov.uk]  
**Sent:** 05 October 2017 12:13  
**To:** Samoyedskye@aol.com



## Wyese NDP 2011 – 2031: Consultation Statement

---

**Cc:** jc.darbyshire@gmail.com

**Subject:** RE: Wyese Group NDP post examination

Dear Alison,

We just need a letter from yourself as the clerk to confirm the withdrawal. Then we will issue the withdrawal decision statement.

Kind regards

Sam

**From:** Samoyedskye@aol.com [mailto:Samoyedskye@aol.com]

**Sent:** 05 October 2017 12:21

**To:** sbanks@herefordshire.gov.uk

**Cc:** jc.darbyshire@gmail.com

**Subject:** Re: Wyese Group NDP post examination

Dear Sam

Please would you kindly withdraw the Wyese Neighbourhood Plan from the process with immediate effect. The plan is to undergo revision and will be resubmitted to the process at a later date.

Thank you

Yours sincerely,

Alison Wright

***Mrs Alison Wright  
Parish Clerk and Steering Group Chair  
Wyese Group  
01981 250860***